

Sovereign Trust (Cyprus) Limited

Privacy Notice for provision of trust and corporate services

1. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it in order to provide corporate management and directorship services and professional trustee services (“the Services”) to you. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘How to contact us’ section.

This Privacy Notice may be updated and/ or re-issued at any time, and we will provide you with notice of any such updates via either email and/or our Website.

2. What Personal Data is

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

‘Criminal offence data’ refers to personal data relating to criminal convictions and offences or related security measures. This covers information about offenders or suspected offenders in the context of criminal activity, allegations, investigations and proceedings.

3. Personal Data we collect

The Personal Data we collect about you will be the minimum necessary to provide the Services. The type of Personal Data we collect is outlined in the table below in the section entitled ‘Purposes, lawful bases and retention periods’.

4. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via our website.

However, we may also need to collect Personal Data from third parties such as:

- Sovereign staff and personnel
- Group staff and Personnel
- Introducers
- Intermediaries
- Courier and mail services
- Recruitment Agencies
- Third Party Contractors and Service Providers
- Financial Entities and payment providers
- Authorities and Regulators

5. Cookies

A cookie is a small text file which is placed onto your device (e.g computer, smartphone or other electronic device) when you use our website.

Our website uses cookies. For further information about cookies and how we use them, please see our [Cookie Notice](#).

6. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to comply with a legal obligation
- Where it is in our legitimate interests (or those of a 3rd party) to do so
- To confirm suitability for us to provide you with the requested services
- We may also use your data in the following situations, which are likely to be rare:
 - With your consent
 - Where we need to protect your vital interests (or someone else's)
 - Where it is needed in the public interest
 - Where it is requested of us by our Regulators and/or License providers



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Client	Name, address, contact details, identification document, personal/work email address Source of Wealth and Source of Funds including Curriculum Vitae	To onboard client and provide a service	Legal Obligation	five (5) years from the termination of the business relationship or the date of an occasional transaction
Client	Passport	To onboard client and provide a service	Legal Obligation	five (5) years from the termination of the business relationship or the date of an occasional transaction
Client	Name, address, email address, VAT number, identity number	For invoice purposes	Contract	five (5) years from the termination of the business relationship or the date of an occasional transaction
Client	Name, address, email address	For mandatory file reviews	Legal obligations	five (5) years from the termination of the business relationship or the date of an occasional transaction
Client	Financial data (Bank account details, tax classification, statements, balances,	To provide the service requested and for mandatory file reviews	Legal obligations	five (5) years from the termination of the business relationship or the date of an occasional transaction



	transactions and receipts) including Source of Wealth and Source of Funds			
Client	Financial data (Bank account details, tax classification, statements, balances, transactions and receipts)	For providing the service & filing of tax documentation	Contract	Seven (7) years from the termination of the business relationship or the date of an occasional transaction
Client	Name, job title/profession, personal/work email address, contact details, employer details & company information	To send you newsletters and keep you updated with promotional activity	Contract	five (5) years from the termination of the business relationship or the date of an occasional transaction. years from the termination of the business relationship or the date of an occasional transaction

For the purposes of AML and countering the financing of terrorism ('CFT') financial services providers are required to maintain copies of the documents and information obtained for KYC purposes, supporting evidence and records of transactions, and relevant communications documents with clients and other persons with whom a business relationship is maintained for a period of five years after the end of the business relationship with their customer or after the date of an occasional transaction. The period of five years may be extended to an additional five-year period where further retention is reasonably justified for AML/CFT purposes.



Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

6. Sharing your Personal Data

In the course of providing you with this product/service – we may need to share your Personal Data with the following third parties:

- Regulators and other Authorities
- Sovereign staff and Personnel
- Group staff and Personnel
- Introducers
- Intermediaries
- Courier and mail services
- Recruitment Agencies
- Third Party Contractors and Service Providers
- Financial Entities and payment providers

7. Marketing Material

We would like to send you information about our products and services, events and news, which may be of interest to you. Where we have your consent or it is in our legitimate interest to do so, we may do this by email, telephone or social media.

You can unsubscribe at any time by:

- contacting us at marketing@sovereigngroup.com
- using the 'unsubscribe' link in emails.

You also have the right to object to your personal data being used for direct marketing purposes at any time.

For more information on how we use your personal data for marketing purposes, please see our [Marketing Privacy Notice](#).

8. Retention

We will retain your personal data for as long as is necessary to provide the services which you have requested from us.

However, we may need to retain some records for a longer period where this is required for us to be able to comply with our legal obligations.

We may also need to retain your personal data for a longer period where this is required in relation to legal claims and/or investigation by local authorities, although this is rare.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

We retain your personal data in accordance with the retention periods set out in the table above.

We will then dispose of said information, when and as is necessary, such information held on you if such is requested by yourself (unless this continues to remain necessarily held by Sovereign for the provision of a service.

8. International Transfers

Your personal data may be shared within the Sovereign Group. This may include transferring your personal data to other Group offices.

We may also share your personal data with 3rd party service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

- In the EU/EEA these standards include Standard Contractual Clauses (SCCs) approved by the European Commission, which contractually oblige the entities in those countries to operate to the data protection standards expected within the EU/EEA.

In such cases, our service providers and suppliers are data processors (data intermediaries) and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

9. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. In case we decide to use your Personal Data for marketing purposes, you have the right to object and we will stop sending you marketing material.
- **Right to portability**
You have the right to ask us to transfer your Personal Data to another party.

- **Right to withdraw consent**

If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you.

- **Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in Cyprus is the OCPDP who can be contacted online at:

[OCPDP Contact](#)

Office address: kypranoros 15, Nicosia 1061 , Cyprus

Postal address: P.O.Box 23378, 1682 Nicosia, Cyprus

Tel: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

How to exercise your rights

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

10. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact our Data Protection Officer as follows:

By post: 16, Herodotou Street, Limassol, Cyprus

By Email: gayiomamitis@sovereigngroup.com

Tel: +357 25 733 440 11.

Changes to this privacy notice

We keep our privacy notice under regular review to make sure it is up to date and accurate. We will update this notice accordingly on our website.

Last modified 17/05/2024