

Sovereign Asset Management Limited

Privacy Notice for provision of investment advice, portfolio management, collective investment scheme intermediary and advising on personal and occupational pension schemes.

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 investment advice, portfolio management, collective investment scheme intermediary and advice on personal and occupational pension schemes 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.

2. What Personal Data is

'Personal Data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

'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 investment advice, portfolio management, collective investment scheme intermediary and advice on personal and occupational pension schemes. 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.

We may also need to collect Personal Data from third parties such as:

- Investment management firms
- Investment management platforms
- Banks
- Sovereign Group offices
- Publicly available sources such as Companies House and WorldCheck.

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 collect and retain members' data in accordance with specified purposes, lawful bases, and designated retention periods to ensure compliance with regulatory requirements, provide effective services, and safeguard the privacy and security of our members' information.

We are committed to adhering to rigorous policies and procedures governing the retention of client records and audio recordings, ensuring strict compliance with established guidelines and industry standards.

We will only use your Personal Data when the law allows.

Most commonly, we will use your Personal Data in the following circumstances:



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Client-Pension	Name, address, email address, marriage status, job title, Curriculum Vitae (CV), bank account details.	To set up a general investment account, pension, SIPP, QROPS investment account.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Client.	6 years following the date of the exit, unless retention is required by another enactment.
Client - Pension	Name, address, email address, client reference number.	To provide investment advice, portfolio management, advice on personal and occupational pension schemes.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Client.	6 years following the date of the exit, unless retention is required by another enactment.
Client - Pension	Source of funds and wealth, passport and/ or identity card, pension application form, membership certificate	To fulfil our regulatory compliance checks, including 'Know Your Client' checks and confirming/ verifying your identity.	Compliance with a legal obligation: Article 6 (1)(c) of the GDPR, Schedule 1, Part 2, Paragraph 15 & Paragraph 10 of the Data Protection Act and Section 11 of Proceeds of Crime Act 2015 Gibraltar Laws.	6 years following the date of the exit, unless retention is required by another enactment.
Client - Company	Name, address, email address, phone number, structure chart,	To set up a corporate investment account.	Contract. The processing is necessary to perform the	6 years following the date of the exit, unless



	register of beneficial owners, CVs.		agreement(s) to provide services to the Client.	retention is required by another enactment.
Client - Company	Name, address, email address, client reference number.	To provide investment advice, portfolio management.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Client.	6 years following the date of the exit, unless retention is required by another enactment.
Client – Company	Name, addresses, phone number and passport of controllers, directors, members; source of funds and source of wealth, business activity, certificate of incorporation, memorandum articles of association, list of authorised signatories, financial statements, any nominee shareholders.	To fulfil our regulatory compliance checks, including ‘Know Your Client’ checks and confirming/ verifying your identity.	Compliance with a legal obligation: Article 6 (1)(c) of the GDPR, Schedule 1, Part 2, Paragraph 15 & Paragraph 10 of the Data Protection Act and Section 11 of Proceeds of Crime Act 2015 Gibraltar Laws.	6 years following the date of the exit, unless retention is required by another enactment.
Client – Trusts	Name and address of the trust the settlor/s, the trustees, the	To set up a Trust Investment account.	Contract. The processing is necessary to perform the	6 years following the date of the exit, unless



	protector, beneficiaries, and those who have benefited; structure chart, passport and proof of address of beneficiaries, settlors, protectors, enforcers; CVs.		agreement(s) to provide services to the Client	retention is required by another enactment.
Clients - Trusts	Name, address, email address, client reference number.	To provide investment advice, portfolio management.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Client	6 years following the date of the exit, unless retention is required by another enactment.
Clients - Trusts	Purpose of trust, source of wealth and source of funds, trust deed, extract which would state the nature of trust, trust accounts; trustee name, trustee register of directors/members, their proof of address and passport, certificate of incorporation,	To fulfil our regulatory compliance checks, including 'Know Your Client' checks and confirming/ verifying your identity.	Compliance with a legal obligation: Article 6 (1)(c) of the GDPR, Schedule 1, Part 2, Paragraph 15 & Paragraph 10 of the Data Protection Act and Section 11 of Proceeds of Crime Act 2015 Gibraltar Laws.	6 years following the date of the exit, unless retention is required by another enactment.



	<p>memorandum and articles of association, authorised signatory list, financial statements.</p>			
All clients	<p>Audio recordings</p>	<p>To facilitate reception, transmission, and execution of client orders. To facilitate the detection and prevention of market abuse and provide a means of resolving disputes.</p>	<p>Legal obligation. To comply with Markets in Financial Instruments Directive (MiFID) requirements.</p>	<p>6 years following the date of the exit, unless retention is required by another enactment.</p>
All clients (where applicable and/ or required)	<p>Name, address, date of birth, passport, ID card, profession.</p>	<p>To conduct background checks which may reveal information about criminal convictions or offences. This ensures that we can comply with our legal and regulatory obligations.</p>	<p>The processing is necessary for reasons of substantial public interest, on the basis of applicable law (including laws designed to combat money laundering, bribery and corruption and avoidance of sanctions.</p>	<p>6 years following the date of the exit, unless retention is required by another enactment.</p>

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.



7. Marketing

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 info@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 purpose, please see our [Marketing Privacy Notice](#).

8. 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:

- Investment management firms
- Investment management platforms
- Banks
- Regulatory Authorities
- Intermediaries
- Sovereign Group offices

9. Retention

We will retain your personal data whilst it is required for the relevant purposes or to meet legal requirements.

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.

Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner.

10. 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.

These standards include Standard Contractual Clauses (SCCs) approved by Gibraltar's Information Commissioner and enable the free flow of personal data when embedded in a contract.

They are the following:

- The International Data Transfer Agreement
- The International data transfer addendum to the European Commission's standard contractual clauses for international data transfers.

In such cases, our service providers and suppliers are data processors (customer relationship management database, investment platforms, screening systems) 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.

11. 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. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your Personal Data.
- **Right to portability**
You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect

you. We do not use automated decision-making.

- **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.

- **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 Gibraltar is the Gibraltar Regulatory Authority who can be contacted online at:

Gibraltar Regulatory Authority

2nd floor

Eurotowers 4

1 Europort Road

Gibraltar GX11 1AA

Tel: (+350) 200 74636

Email: info@gra.gi

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.

12. 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:

Sovereign Asset Management Limited

Sovereign Place, 117 Main Street, Gibraltar

Email address: dpo@sovereigngroup.com

Phone number: +350 200 76173

13. 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.

This Privacy Notice was last updated in May 2024.