

Sovereign Asset Management Limited

Privacy Notice

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 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 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, Teams, 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

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 clients 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.

Personal data may also be processed where necessary to support the operation, maintenance, testing, monitoring, security, and improvement of our systems and infrastructure, including business continuity, disaster recovery, cybersecurity, audit, and data integrity activities. Such processing is undertaken to ensure the ongoing availability, reliability, and security of our services and systems.

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

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.

Categories of Individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Client – Pension	Name, address, email address, marriage status, occupation, Curriculum Vitae (CV), bank account details, national insurance number, phone number, tax ID number, education level, nationality, tax domicile, spouse information (if applicable), pension membership certificate (where available), emergency contact, account opening application, investment amount	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 after termination of services.

Client – Pension	Name, address, email address, client scheme reference number, investment knowledge surveys, phone number, tax domicile, spouse information (if applicable), pension application form, pension transfer documents (where applicable), valuations from the previous pension provider, intended retirement age, marital status, assets and liabilities held, health status, income, credit history, meeting notes.	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 after termination of services.
Client – Pension	Source of funds and source of wealth (e.g: pension application form, evidence of transfer, valuations, bank statements), passport and/or identity card/driving license/permit of residence, proof of address, date of birth, occupation, CV, pension application form, membership certificate, evidence of pension transfer, valuations from the previous pension provider, income, nationality, jurisdiction of residency	To fulfil our regulatory compliance checks, including 'Know Your Client' checks and confirming/verifying identity, conducting due diligence	Compliance with our legal obligations, including: <ul style="list-style-type: none"> • Laws covering anti-money laundering and the prevention of terrorist financing. • Legislation and/or regulation requiring a regulated entity to comply. 	6 years after termination of services.
Client- General Investment account	Name, address, email address, marriage status, job title, Curriculum Vitae (CV), bank account details, national insurance number, phone number, tax ID number, education level, nationality, tax domicile, spouse information (if	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 after termination of services.

	applicable), pension membership certificate (where available), emergency contact, account opening application.			
Client- General Investment account	Name, address, email address, investment knowledge surveys, phone number, tax domicile, spouse information (if applicable), intended retirement age, marital status, assets and liabilities held, health status, income, credit history, meeting notes, MiFID, Suitability, investment amount.	To provide investment advice, portfolio management.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Client.	6 years after termination of services.
Client- General Investment account	Source of funds and wealth ((e.g: evidence of pension transfer, valuations, bank statements, inheritance, Grant of Probate and/or copy of will, contract of sale),passport and/or identity card/driving license/permit of residence, proof of address, date of birth, occupation, CV, income, nationality, jurisdiction of residency.	To fulfil our regulatory compliance checks, including 'Know Your Client' checks and confirming/verifying identity, conducting due diligence.	Compliance with our legal obligations, including: <ul style="list-style-type: none"> • Laws covering anti-money laundering and the prevention of terrorist financing. • Legislation and/or regulation requiring a regulated entity to comply. 	6 years after termination of services.
Client – Company	Certificate of incorporation, company name, company number, date of incorporation, Memorandum and Articles of Association, company activity registered office address,, email contact, phone number, LEI number., account opening application, bank details.	To set up a corporate investment account.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Client.	6 years after termination of services.

Client – Company	Company name, company address, , client profile, Suitability, MiFID forms, investment advisory agreement, investment amount	To provide investment advice, portfolio management.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Client.	6 years after termination of services.
Client – Company	Name/s and address of beneficial owners, controllers, directors, members; source of funds and wealth (e.g: bank statements, financial statements, valuations (if applicable) resolutions of dividend payments) , business activity, certificate of incorporation, memorandum and articles of association, , nominee shareholders (if any), authorised signatory list, register of members, register of directors, structure chart, business plan, business activity, registered office address.	To fulfil our regulatory compliance checks, including 'Know Your Client' checks, conducting due diligence and confirming/verifying identity,	Compliance with our legal obligations, including: <ul style="list-style-type: none"> • Laws covering anti-money laundering and the prevention of terrorist financing. • Legislation and/or regulation requiring a regulated entity to comply. 	6 years after termination of services.
Client – Trusts	Trust deed, name and address of the trust, date of set up, name/s and details of settlor/s, beneficiaries, protector and/or executor (if applicable, beneficiaries, and those who have benefited; LEI number, account opening application, source of funds and wealth (e.g: bank statements, financial statements, valuations (if applicable)), nature of trust, bank details.	To set up a Trust Investment account.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Client.	6 years after termination of services.
Client – Trusts	Trust name, trust address, client profile, Suitability, MiFID forms, investment	To provide investment advice, portfolio management.	Contract. The processing is necessary to perform the	6 years after termination of services.

	advisory agreement, investment amount.		agreement(s) to provide services to the Client.	
Client – Trusts	<p>Purpose of trust, source of wealth and funds, trust deed, nature of trust, trust accounts, structure chart, bank statements, amounts of benefits received by the beneficiaries.</p> <p>Trustee details</p> <p>Name/s and address of beneficial owners, controllers, directors, members; business activity, certificate of incorporation, memorandum and articles of association, nominee shareholders (if any), authorised signatory list, register of members, register of directors,</p> <p>passport and/or identity card/driving license/permit of residence</p>	To fulfil our regulatory compliance checks, including 'Know Your Client' checks and confirming/verifying identity, conducting due diligence	<p>Compliance with our legal obligations, including:</p> <ul style="list-style-type: none"> • Laws covering anti-money laundering and the prevention of terrorist financing. • Legislation and/or regulation requiring a regulated entity to comply. 	6 years after termination of services.
Trust and/or Company Individuals within the structure	<p>Company -Beneficial Owner/s and Controllers- full name, passport and/or identity card/driving license/permit of residence, proof of address, date of birth, occupation, CV, nationality, source of wealth and source of funds (e.g: bank statements, valuations, sale agreements, inheritance documents)</p> <p>Company- Directors- full name, passport and/or identity card/driving license/permit of</p>	To fulfil our regulatory compliance checks, including 'Know Your Client' checks and confirming/verifying identity, conducting due diligence	<p>Compliance with our legal obligations, including:</p> <ul style="list-style-type: none"> • Laws covering anti-money laundering and the prevention of terrorist financing. • Legislation and/or regulation requiring a regulated entity to comply. 	6 years after termination of services.

	<p>residence, proof of address, occupation, date of birth, date of appointment, date of resignation,</p> <p>Company shareholders- full name, address, date of birth, number of shares held, Number of shares transferred/ disposed, share price, class of shares held, date entered as member, date ceased as member.</p> <p>Trust- Settlor- full name, passport and/or identity card/driving license/permit of residence, date of birth, proof of address, occupation, CV, nationality, death certificate (where applicable), source of wealth and source of funds (e.g: bank statements, valuations, sale agreements, inheritance documents)</p> <p>Trust- Protector (if applicable)- full name, passport and/or identity card/driving license/permit of residence, proof of address, nationality, date of birth, occupation, CV.</p> <p>Trust- Executor (if applicable)- full name, passport and/or identity card/driving license/permit of residence, proof of address, nationality, date of birth, occupation, CV.</p> <p>Trust- Beneficiaries (if applicable)- full name, passport and/or identity card/driving</p>			
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	license/permit of residence, proof of address, nationality, date of birth.			
All Clients	Audio recordings (where applicable)	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.	We have a legal obligation to record certain calls to comply with Markets in Financial Instruments Directive (MiFID) requirements.	6 years after termination of services.
All Clients (where applicable and/or required)	Name, address, date of birth, passport and/or identity card/driving license/permit of residence, gender, nationality, country of residency.	To conduct background checks which may reveal information about criminal convictions or offences, ensuring compliance with legal and regulatory obligations.	Where applicable by law, we carry out checks to comply with obligations to prevent fraud, money laundering, terrorist financing, bribery, corruption and international sanctions.	6 years after termination of services.

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 our services – we may share your Personal Data with the following third parties:

- Investment management firms
- Investment management platforms
- Wealth Advisers
- Banks
- Regulatory Authorities
- Insurance
- Intermediaries
- Screening providers
- Client Relationship Management software
- Other Sovereign Group offices

9. Retention

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

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. This only applies in certain circumstances.
- **Right to object to processing** - You have the right to object to us processing your Personal Data in certain circumstances. You have the absolute right to object to your data being used for direct marketing purposes.
- **Right to restrict processing** - You have the right to restrict or suppress our use of your Personal Data in certain circumstances.
- **Right to portability** - You have the right to ask us to transfer your Personal Data to another party. This right only applies in certain circumstances.
- **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.
- **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 June 2026.