



# Sovereign Trust (Hong Kong) 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 trust, corporate and financial accounting 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.

## 2. What Personal Data is

Personal data means information:

- that relates directly or indirectly to a living individual,
- from which the identity of the individual can be directly or indirectly ascertained; and
- in a form in which access to or processing of the data is practicable.

## 3. Personal Data we collect

The Personal Data we collect about you will be the minimum necessary to provide trust, corporate and financial accounting 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:

- Accountants and Auditors
- Banking Corporations
- Employers
- Financial Institutions
- Insurance Companies
- Lawyers

## 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 basis 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:

<b>Categories of individuals</b>	<b>Categories of Personal Data</b>	<b>Purpose of Processing</b>	<b>Obligatory/ Mandatory</b>	<b>Lawful Basis</b>	<b>Retention Period</b>
<b>Client</b>	Name, Address, Email address	To onboard you as a client to provide either trust, corporate or financial accounting services.	Obligatory	Contract	6 years following the date of the transaction
<b>Client</b>	Name, Job Title, Work email address, Work phone number, Company you work for	To send you newsletters and other promotional material	Voluntary	Consent	2 years following last meaningful contact
<b>Client</b>	Financial Data (Bank account details, statements, balances and receipts, tax statements)	KYC, Due Diligence, Opening Bank Account, Preparation of Financial Statements and Audit Report, Company Incorporation, Trust and Fund Formation	Obligatory	Part 2 Customer Due Diligence Requirements under Schedule 2 Requirements Relating to Customer Due Diligence and Record-Keeping (Cap. 615 Anti-Money Laundering and Counter-Terrorist Financing Ordinance)	5 years following the date of the transaction
<b>Client</b>	Identification Documents (residency card, identity card) and Proof of Address documentation (utility bill, bank statement)	Opening Bank Account, KYC, Due Diligence, Preparation of Financial Statements and Audit Report, Company Incorporation, Trust and Fund Formation	Obligatory	Part 2 Customer Due Diligence Requirements under Schedule 2 Requirements Relating to Customer Due Diligence and Record-Keeping (Cap. 615 Anti-Money Laundering and Counter-Terrorist Financing Ordinance)	5 years following the date of the transaction
<b>Client</b>	Special categories data (Passport)	Opening Bank Account, KYC, Due Diligence, Trust and Fund Formation	Obligatory	Part 2 Customer Due Diligence Requirements under Schedule 2 Requirements Relating to Customer Due Diligence and Record-Keeping (Cap. 615 Anti-Money Laundering	5 years following the date of the transaction

				and Counter-Terrorist Financing Ordinance)	
<b>Client</b>	Resume, Personal Reference	KYC, Due Diligence, Offshore Trust Formation	Obligatory	Part 2 Customer Due Diligence Requirements under Schedule 2 Requirements Relating to Customer Due Diligence and Record-Keeping (Cap. 615 Anti-Money Laundering and Counter-Terrorist Financing Ordinance)	5 years following the date of the transaction

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](mailto: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 the abovementioned services – we may need to share your Personal Data with the following third parties:

- Accountants and Auditors
- Banking Corporations
- Financial Institutions
- Insurance Companies
- Lawyers
- Other Service Providers

## **9. 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 third party service providers outside Hong Kong. If we do so, we will ensure that your personal data will be protected in that jurisdiction to a level which is commensurate with PDPO and when we consider appropriate, enter into contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

In such cases, our service providers and suppliers are our data processors 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.

## **10. 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, 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.

## 11. Your rights and how to lodge your complaints

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 relating to direct marketing**  
If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **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 Hong Kong is the PCPD can be contacted as follows:

**Office of the Privacy Commissioner for Personal Data (PCPD)**

Address: Unit 1303, 13/F, Dah Sing Financial Centre,  
248 Queen’s Road East, Wan Chai, Hong Kong

Telephone: (852) 2827 2827

Website: [www.pcpd.org.hk](http://www.pcpd.org.hk)

Email: [complaints@pcpd.org.hk](mailto:complaints@pcpd.org.hk)

### 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 Trust (Hong Kong) Limited**

Address: 8/F, 299QRC, 287-299 Queen’s Road Central, Hong Kong

Telephone: (852) 2542 1177

Website: [www.sovereigngroup.com](http://www.sovereigngroup.com)

Email: [mwong@sovereigngroup.com](mailto:mwong@sovereigngroup.com)

### **13. Changes to this privacy notice**

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified May 2025