

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 "Categories of Personal Data and Purposes".

4. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, 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 a website.

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

6. Categories of Personal Data and Purposes

We will collect, use and process the following categories of your Personal Data for the following purposes, specifying in each case whether the provision of such Personal Data is obligatory or voluntary:

Categories of Personal Data	Purposes	Obligatory/Voluntary
Name, Address, Email address	To onboard you as a client to provide either trust, corporate or financial accounting services.	Obligatory
Name, Job Title, Work email address, Work phone number, Company you work for	To send you newsletters and other promotional material	Voluntary
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
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
Special category data (Passport)	Opening Bank Account, KYC, Due Diligence, Trust and Fund Formation	Obligatory
Resume, Personal Reference	KYC, Due Diligence, Offshore Trust Formation	Obligatory
Name, address, business email address, job title	Client engagement purposes to tailor our level of services to you.	Voluntary

If you fail to provide any obligatory Personal Data, we may not be able to provide our services to you.

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, 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.
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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. Sharing your Personal Data

In the course of providing you with our 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 the requirements of the Personal Data (Privacy) Ordinance (Cap 486) and/or when we consider appropriate, enter into contractual arrangements to oblige the service providers in those jurisdictions to operate to appropriate data protection standards.

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

11. Your rights and how to lodge your complaints

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

- **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 this 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 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 Office of the Privacy Commissioner for Personal Data, which can be contacted as follows:

Office of the Privacy Commissioner for Personal Data

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
Email: 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 the deadline stipulated under the Personal Data (Privacy) Ordinance (Cap 486). 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
Email: DPOHongKong@SovereignGroup.com

13. Changes to this privacy notice

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

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