

Sovereign Trust (Malta) Limited

Privacy Notice for provision of administrator of foundations, corporate trustee or other 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 administrator of foundations, corporate trustee or other corporate 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 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 administrator of foundations, corporate trustee or other corporate 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 or video call, text or email and/or via our website whilst using cookies to track clicks, locations and such online behaviour.

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

Commented [PD1]: Sovereign entity to fill in service/product details

Commented [PD2]: Sovereign entity to fill in service/product details

Commented [JS3]: Are any background / screening checks carried out that may capture criminal conviction data?

Commented [SM4R3]: Any searches and screening made would be done via Google and WorldCheck search engines, however each of these are publicly available publications of news, media, judgements etc and such searches are conducted as a matter of regulatory requirements (being the lawful purpose from Sovereign's necessity to perform such searches. The checks are done due to the regulator and licensor conditions for said license.

Commented [BL5]: Amend if necessary

Commented [PD6]: Sovereign entity to add any third parties it sources personal data from as part of providing this service/product from (if applicable) - otherwise delete this para.

- Third Party Contractors and Service Providers
- Financial Entities and payment providers
- Authorities and Regulators

5. 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

Commented [JD7]: 'Add or delete as appropriate'.

Commented [JS8]: If this information is provided in the table below, this can be removed to avoid duplication.

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<u>Categories of individuals</u>	<u>Categories of Personal Data</u>	<u>Purpose of Processing</u>	<u>Lawful Basis</u>	<u>Retention Period</u>
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	Contract	Five (5) years from the termination of the business relationship
Client	Name, address, business email address, job title	Client engagement purposes to tailor our level of service to you	Contract	Five (5) years from the termination of the business relationship
Client	Passport	To onboard client and provide a service	Contract	Five (5) years from the termination of the business relationship
Non-Eu Client wishing to act as Director	Criminal Conduct Certificate	To provide to Malta Business Registry	Legal Obligation	Five (5) years from the termination of the business relationship
Client	Name, address, email address, VAT number, identity number	For invoice purposes	Contract	Five (5) years from the termination of the business relationship
Client	Name, address, email address	For ongoing mandatory file reviews	Reporting obligations and Regulatory requirements	Five (5) years from the termination of the business relationship
Client	Financial data (Bank account details, tax classification, statements, balances,	To provide the requested services and for transaction monitoring and mandatory file reviews	Reporting obligations and	Ten (10) years from the termination of the business relationship

Commented [PD9]: The below examples are for illustrative purposes only. Sovereign entity to complete table based on the information it collects to provide the product or service

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	transactions and receipts) including Source of Wealth and Source of Funds		Regulatory requirements	
Client	Financial data (Bank account details, tax classification, statements, balances, transactions and receipts)	For providing the requested services & filing of tax documentation	Contract	Ten (10) years from the termination of the business relationship
Client	Video recordings for certification purposes	To provide the requested services and for mandatory processing requirements	Regulatory obligations	Five (5) years from the termination of the business relationship
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	Two (2) years from the termination of the business relationship

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

Commented [PD10]: Sovereign entity to add any third parties it sources personal data from as part of providing this service/product from (if applicable) - otherwise delete this para.

7. Retention and Destruction of Data

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.

Your information will be securely stored on an internal storage system called View Point.

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).

Commented [JS11]: Under this section would also need to include how and where personal information is stored and how you intend to securely destroy or dispose of it. Such as -

Your information is securely stored on [where it is stored]
We retain your personal data in accordance with the retention periods set out in the table above. We will then dispose your information by [how this will be deleted].

Commented [PD12]: This should be regarded as the default wording. Entity to amend, add to or delete from as required.

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.

- 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 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. 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 Malta is the IDPC who can be contacted online at: [Home - IDPC](#) or on Floor 2, Airways House, Triq Il-Kbira, Tas-Sliema SLM 1549 +356 2328 7100 or idpc.info@idpc.org.mt

Commented [JS13]: To include full details - address, contact number and email address.

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:

Sovereign Trust (Malta) Limited, Level 5 St Julians Business Centre, Elia Zammit Street, St Julians STJ 3153, Malta

maltadpo@sovereigngroup.com

+356 2122 8411

11. 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 June 2026.

Commented [JS14]: To include wording noting that changes to information in the PN will be proactively communicated to data subjects.