

# TRIDENT TRUST GROUP GLOBAL PRIVACY NOTICE

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## 1. Scope

- 1.1. The Trident Trust Group (also referred to as “we” or “our” in this Privacy Notice) has offices in many jurisdictions worldwide, as set out at Appendix A (our “**Offices**”).
- 1.2. This Privacy Notice describes the types of information we collect, the purposes for which we collect it, the other parties with whom we share it, and the measures we take to protect the security of the information. It also explains the rights and choices that individuals have with respect to their information, and how to contact us about our privacy practices.
- 1.3. This Privacy Notice applies to the interactions we have with individuals who deal with our Offices. Privacy rights and obligations may differ depending on the Data Protection Legislation (defined below) applicable to your personal data. If you are unclear as to your rights in relation to your personal data, please contact us using the contact details provided at Section 12 below.
- 1.4. If you live in California, please refer to section 14 below titled “California Privacy Notice”.

## 2. Definitions and Interpretation

- 2.1. “Data Protection Legislation” means all applicable legislation relating to privacy or data protection, including, but not limited to, and to the extent applicable, the EU General Data Protection Regulation 2016/679 (“**GDPR**”), the GDPR as it forms part of the domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 (“**UK GDPR**”), the Data Protection Act 2018, the Data Protection Law (DIFC Law No. 5 of 2020), the California Consumer Privacy Act of 2018 (“**CCPA**”) as amended by the California Privacy Rights Act of 2020 (“**CPRA**”), the Virginia Consumer Data Protection Act (“**VCDPA**”), the Colorado Privacy Act (“**CPA**”), the Utah Consumer Privacy Act (“**UCPA**”), the Connecticut Data Privacy Act (“**CTDPA**”), the New York SHIELD Act.
- 2.2. Where we use the terms “personal data”, “personal information”, “data subject”, “controller”, “processor” and “process” (and their derivatives), such terms shall have the meanings given to them in the Data Protection Legislation.
- 2.3. “You” or “your” may be any person dealing with us, or any person connected to the individuals or entities (including but not limited to trusts and companies) to which we provide services or whose information is otherwise provided to us in the context of our provision of services. For example, you may be a client, enquirer, complainant, intermediary, associate, representative, advisor, director, settlor, beneficiary, trustee, other officer or appointee, attorney, introducer, supplier, service provider, lender, borrower (or a family member, guardian, employee, contractor, consultant or agent of any of the above).

## 3. Our Privacy Principles

- 3.1. We may collect and process information relating to you where you provide that information to us, or where we have received your information from other sources (including screening service providers), in each case in order to provide our services or do business.
- 3.2. We shall process any information we collect in accordance with Data Protection Legislation and the provisions of this Privacy Notice and/or our US Privacy Notice (as applicable).
- 3.3. Before providing us with any information relating to any third party, you are responsible for ensuring that any such individual is aware of this Privacy Notice and that the provisions of this Privacy Notice are clearly and conspicuously communicated to them.
- 3.4. The information we collect includes personal data, which refers to information that can be used to identify a natural person, including the information set out in Section 4.

- 3.5. Some of the information that we collect about you may include sensitive categories of personal data which are subject to additional requirements under the Data Protection Legislation (such as information about racial or ethnic origin, criminal or alleged criminal offences, trade union membership or health and lifestyle) ("**Special Category Personal Data**"). Where required by applicable Data Protection Legislation, we will seek separate permission from you in writing to process the Special Category Personal Data.
- 3.6. If you refuse to provide us with your information, or you object to us processing such information (see Section 8 for more information about your rights in relation to your information) the consequences include that:
- 3.6.1. We may be prevented from conducting business with you and we may be unable to provide our services to you and/or an entity connected to you;
  - 3.6.2. It may result in an entity, in relation to which we provide services and to which you are connected, being in breach of applicable law or regulation and being subjected to any attendant penalties;
  - 3.6.3. The failure to provide certain personal data in certain circumstances may trigger a requirement for us or any of our employees or agents to consider whether to make a disclosure under applicable anti-money laundering and countering the financing of terrorism legislation.

#### 4. Our Use of Your Information and the Lawful Grounds for Using It

- 4.1. We may collect, record and use information about you, and the business you conduct with us, in physical and electronic form, and we will hold, use and otherwise process the data in accordance with applicable Data Protection Legislation and as set out in this Privacy Notice. This may include sharing this information with third parties and processing it outside the jurisdiction in which it originated. Information we ask for, why we ask for it, and our legal bases for processing that information include:

PURPOSE	DATA SUBJECT	TYPES OF PERSONAL DATA	LEGAL BASIS FOR PROCESSING
<p><b>Services:</b> To administer and provide any services to you and/or entities to which you are connected and to meet our obligations</p>	<p>Current clients or individuals connected to such clients (which may include, without limitation, a client's employees or consultants, officers/ trustees and attorneys appointed under Powers of Attorney granted by client entities)</p>	<ul style="list-style-type: none"> <li>&gt; Contact information, such as an individual's home or work address and contact details (including name, e-mail address, physical address and business phone number) and advice, views and other comments;</li> <li>&gt; Pay records, bank account details (including routing details), national insurance number, and tax information;</li> <li>&gt; Information we obtain from the way you use our services (including through the use of cookies), such as when</li> </ul>	<p>Processing is necessary: to perform the agreement we have with you, or with an entity to which we provide services with which you are connected, or to take steps to enter into such an agreement; and for the purposes of a legitimate interest pursued by us (including to ensure that our businesses are well managed and to fulfil our fiduciary duties and responsibilities in relation to the entities to which we provide services and to ensure that our website is usable).</p>

PURPOSE	DATA SUBJECT	TYPES OF PERSONAL DATA	LEGAL BASIS FOR PROCESSING
		<p>you use our website; and;</p> <ul style="list-style-type: none"> <li>&gt; Information we obtain from third parties, including information from other members of the Trident Trust Group, or your representative or intermediary.</li> </ul>	
<p><b>Monitoring and Analysis:</b> To monitor and analyse our communications with you and the conduct of the goods and services received by or provided to you (including for training and quality purposes), and to enable us to carry out statistical and other analysis</p>	<p>Current clients or individuals connected to such clients (which may include, without limitation, a client's employees or consultants, officers/trustees and attorneys appointed under Powers of Attorney granted by client entities)</p>	<ul style="list-style-type: none"> <li>&gt; Information that you disclose to us when communicating with us, including details of any complaints or concerns raised by you; and</li> <li>&gt; Information we obtain from the way you use our services (including through the use of cookies) and the way you do business with us, such as when you use our website.</li> </ul>	<p>Processing is necessary: to perform the agreement we have with you, or with an entity to which we provide services with which you are connected, or to take steps to enter into such an agreement; and for the purposes of a legitimate interest pursued by us (including to ensure that our services and business are well managed, to protect our business interests, and to evaluate and develop our products and services).</p>
<p><b>Legal Requirements:</b> To comply with any requirement of applicable law and regulations including to fulfil our obligations under any applicable reporting agreement with any tax authority or revenue service</p>	<p>Past, current or prospective clients or individuals connected to such clients (which may include, without limitation, family members, lenders to/ borrowers from clients, officers/ trustees of client entities and/ or ownership chains of client entities and attorneys appointed under Powers of Attorney granted by client entities)</p>	<ul style="list-style-type: none"> <li>&gt; Information we obtain from screening activities including screening services providers, and research from publicly available sources;</li> <li>&gt; Records of the business transactions conducted with us;</li> <li>&gt; Pay records, bank account details (including routing details), source of wealth, national insurance number, and tax information;</li> </ul>	<p>Processing is necessary: for compliance with a legal obligation to which we are subject; to perform the agreement we have with you, or with an entity to which we provide services with which you are connected, or to take steps to enter into such an agreement; and for the purposes of a legitimate interest pursued by us (including to comply with court, tribunal or other judicial orders, including but not limited to production orders and</p>

PURPOSE	DATA SUBJECT	TYPES OF PERSONAL DATA	LEGAL BASIS FOR PROCESSING
		<ul style="list-style-type: none"> <li>&gt; Offences and alleged offences; and</li> <li>&gt; Information we obtain from third parties, such as information that we obtain when verifying details supplied by you including information from other members of the Trident Trust Group, your representative or intermediary, employers, clients, crime and fraud prevention agencies, government and public bodies or other similar organizations.</li> </ul>	<p>discovery or disclosure orders, to prevent or detect abuse of our services, to ensure that our services and business are well managed and to defend ourselves, or the entities to which we provide services, against legal claims or to protect our reputational interests).</p>
<p><b>Commercial Purposes:</b> For our reasonable commercial purposes (including quality control, administration, and assisting us to develop new and improved products)</p>	<p>Current and prospective clients or individuals connected to such clients (which may include, without limitation, officers/trustees and attorneys appointed under Powers of Attorney granted by client entities), suppliers, service providers, advisors</p>	<ul style="list-style-type: none"> <li>&gt; Information about an individual that you or they disclose to us when communicating with us, including details of any complaints or concerns raised by you;</li> <li>&gt; Information we obtain from the way you use our services and the way you do business with us, such as when you use our website; and</li> <li>&gt; Information we obtain from third parties, such as information that we obtain when verifying details supplied by you including information from other members of the Trident Trust Group, or your representative or intermediary.</li> </ul>	<p>Processing is necessary for the purposes of a legitimate interest pursued by us (including quality control, administration, and assisting us to develop new and improved products and services).</p>
<p><b>Identity and Background Checks:</b> To confirm your identity and carry out background checks,</p>	<p>Current and prospective clients or individuals connected to such clients (which may include,</p>	<ul style="list-style-type: none"> <li>&gt; Date of birth, marital/civil partnership status, details of dependents and next of kin, family,</li> </ul>	<p>Processing is necessary: for compliance with a legal obligation to which we are subject; to perform</p>

PURPOSE	DATA SUBJECT	TYPES OF PERSONAL DATA	LEGAL BASIS FOR PROCESSING
including as part of our checks in relation to anti-money laundering and countering the financing of terrorism, compliance screening	without limitation, family members, and officers/trustees)	lifestyle and social circumstances; > Financial details; > Information on business activities; > Nationality; > Source of wealth, tax information, ownership/beneficial ownership of assets; > Information in relation to transactions concluded by you (contracts or payments or transfer of other property); > Police/background check information; and > Information we obtain from third parties, such as information that we obtain from fraud prevention agencies or government or other public bodies.	the agreement we have with you, or with an entity to which we provide services with which you are connected, or to take steps to enter into such an agreement; and for the purposes of a legitimate interest pursued by us (including to prevent fraud and other crimes and to defend ourselves, or the entities to which we provide services, against legal claims or to protect our reputational interests).
<b>Follow Up Communications:</b> To follow up with you after you contact us to see if we can provide any further assistance or to check your instructions to us	Complainants, current and prospective clients or individuals connected to such clients	> Contact information, such as an individual's home or work address and contact details (including name, e-mail address, physical address and business phone number) and advice, views and other comments; and > Information we collect or you disclose when you communicate with us, when you conclude transactions with us, or apply for our products or services.	Processing is necessary: to perform the agreement we have with you, or to take steps to enter into such an agreement; for the purposes of a legitimate interest pursued by us (including to ensure that our services and business are well managed and to ensure that complaints are investigated).

PURPOSE	DATA SUBJECT	TYPES OF PERSONAL DATA	LEGAL BASIS FOR PROCESSING
<p><b>Safety:</b> To ensure the safety of our premises and personnel</p>	<p>Individuals captured by CCTV images which may include past, current or prospective clients or persons connected to such clients; suppliers; professional advisors; service providers</p>	<ul style="list-style-type: none"> <li>&gt; Photo and video CCTV recordings.</li> </ul>	<p>Processing is necessary for the purposes of a legitimate interest pursued by us (including to prevent fraud and crimes and to protect our business interests).</p>
<p><b>Business Reorganization:</b> To share information with relevant third parties in the context of a sale or potential sale of a relevant part of our business, subject always to confidentiality obligations</p>	<p>Current clients or individuals connected to such clients; our suppliers and service providers</p>	<ul style="list-style-type: none"> <li>&gt; Our agreements with you which may include your name and contact address (to the extent permitted under Data Protection Legislation).</li> </ul>	<p>Processing is necessary for the purposes of a legitimate interest pursued by us.</p>
<p><b>Marketing:</b> To the extent permitted by Data Protection Legislation, to bring to your attention (in person or by post, email or telephone) information about additional services offered by us or our third party partners, which may be of interest to you and to improve the relevance of marketing messages we or our third party partners may send you in accordance with Data Protection Legislation</p>	<p>Current and prospective clients or individuals connected to such clients; visitors to our website</p>	<ul style="list-style-type: none"> <li>&gt; Contact information, such as an individual's home or work address and contact details (including name, e-mail address, physical address and business phone number) and advice, views and other comments;</li> <li>&gt; Information relating to the products and services provided to you;</li> <li>&gt; Information we obtain from the way you use our services (including through the use of cookies), such as when you use our website; and;</li> <li>&gt; Information we collect or your disclose in your communications with us.</li> </ul>	<p>Processing is necessary for the purposes of a legitimate interest pursued by us (such as to keep our clients informed about relevant products and services, unless you have indicated at any time that you do not wish us to do so) or processing is on the basis of lawful consent obtained from you.</p>

- 4.2. In relation to any processing of special categories of personal data, we may generally rely on obtaining specific consent in order to process such information, although it may be necessary for us to use certain information without obtaining your consent where we have legal grounds to do so. Where you have consented to our processing of such information (including special categories of personal data), you may withdraw such consent at any time by contacting us using the contact details in Section 12. Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other lawful bases for continued processing is applicable.
- 4.3. Please review our [cookies notice](#) for more information about how we use cookies, including information about the cookies that we use, the purposes of those cookies, the third parties who may process information stored in or accessed from your device and the duration of any cookies you wish to set.

## 5. Automated Decision-Making and Profiling

We do not carry out automated decision-making or profiling in relation to you.

## 6. Sharing Your Information with Others

- 6.1. We keep all personal data confidential. However, in order to service your needs to the best of our ability, and to comply with applicable laws and regulations of the jurisdictions, we may share any information in our possession about you.
- 6.2. We may share information about you between our Offices, or with third parties, as necessary for any of the purposes described in this Privacy Notice. Where we share such information, we will ensure that, where applicable, any such disclosure is compliant with Data Protection Legislation. Where we share information about you between members of the Trident Trust Group, we shall do so as independent controllers.
- 6.3. Information about you in our possession may be transferred to jurisdictions outside of the country in which you are located for any of the purposes described in this Privacy Notice.
- 6.4. When we process your personal data outside of the country in which you are located, we will, where required by Data Protection Legislation, impose contractual obligations on the recipients of that data to protect such information according to the standard required by applicable Data Protection Legislation. We will also ensure that your personal data is protected using safeguards in accordance with Data Protection Legislation. These safeguards include implementing standard contractual clauses for transfers of personal information between members of the Trident Trust Group, which require each Trident Trust Group company to protect personal information it transfers from the jurisdiction in which it was collected in accordance with Data Protection Legislation. Please contact us using the contact details in Section 12 ("Contacting Us") in order to request information about the safeguards we use. Please note that where the party importing the personal data is registered under the EU-U.S. Data Privacy Framework program (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework program (Swiss-U.S. DPF) (as applicable) as set forth by the U.S. Department of Commerce (the "Data Privacy Framework"), the arrangements set out in section 13 of this Privacy Notice will apply.
- 6.5. You should be aware that certain countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information they hold, and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. However, personal data will in any event be protected to a standard that is at least essentially equivalent to that applicable in its jurisdiction of origin, through the use of additional safeguards if necessary.
- 6.6. You understand and accept that many jurisdictions have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.



- 6.7. To the extent permitted by Data Protection Legislation, we may also transfer your information in situations where you have consented to the transfer.
- 6.8. The recipients, or categories of recipients, of your information may be:
- 6.8.1. Our **service providers**, to the extent needed for them to provide services to us;
  - 6.8.2. Any **revenue service or tax authority**, if so entitled under applicable law and regulations, and international reporting obligations;
  - 6.8.3. **Our advisors** (including, but not limited to, accountants, lawyers, tax advisors, or other professional advisors) and financial services providers (including, but not limited to, banks, investment managers, investment advisers and brokers);
  - 6.8.4. **Your advisors** (including, but not limited to, accountants, lawyers, tax advisors or other professional advisors);
  - 6.8.5. **Professional and financial advisors and service providers** (including, but not limited to, accountants, lawyers, tax advisors, or other professional advisors, banks and investment brokers) appointed by the entities to which we provide services;
  - 6.8.6. **Governmental and quasi-governmental bodies**, and officially appointed persons worldwide, to whom we have a legal obligation to provide information in relation to you, such as company registries, registered offices and registered agents, which may also include other such registries, appointed persons or repositories of information;
  - 6.8.7. **Courts**, tribunals and other judicial bodies worldwide;
  - 6.8.8. **Regulators** and authorities worldwide, including law enforcement authorities in connection with their duties;
  - 6.8.9. **Fraud prevention agencies, crime enforcement agencies and terrorism prevention agencies** that will use it to detect, investigate and prevent fraud, money-laundering, terrorism and other crimes;
  - 6.8.10. Anyone to whom we may transfer our rights and/or obligations; and
  - 6.8.11. Any other person or entity after a restructure, sale or acquisition of any member of the Trident Trust Group, as long as that person or entity uses your information for the same purposes for which it was originally given to us or used by us (or both).
- 6.9. If we, a fraud prevention agency, crime enforcement agency or terrorism prevention agency determine that you pose a fraud or money laundering and/or terrorist financing risk:
- 6.9.1. We may refuse to provide services to you and/or any entities to which you are connected, or we may stop providing existing services to you and/or entities to which you are connected;
  - 6.9.2. A record of any fraud or money laundering and/or terrorist financing risk will be retained by relevant agencies, and may result in others refusing to provide services, financing or employment to you, and/or entities to which we provide services, and to which you are connected.
- 6.10. We do not use your personal data for any of the following purposes:
- 6.10.1. **Selling or Sharing:** We do not sell your personal data to third parties or share it for purposes of cross-context behavioural advertising. We also do not knowingly sell children's personal data.
  - 6.10.2. **Profiling:** We do not use your personal data for profiling in furtherance of decisions that produce legal or similarly significant effects for you.

6.10.3. **Use of sensitive information:** We do not use your Sensitive Personal Information (as defined in the California Privacy Chart below) or Special Category Personal Data except as required to provide services to you.

## 7. Sharing Another Individual's Information with Us

If any information (including special categories of personal data) that you provide to us relates to any third party, by providing us with such information, you confirm that you have obtained any necessary permissions from such persons regarding the reasonable use of their information in accordance with this Privacy Notice or are otherwise permitted to give us this information on their behalf.

## 8. Your General Rights in Relation to Your Information

8.1. Depending on the Data Protection Legislation that applies to your personal information, you may have a number of rights concerning the way that we use your information. At any time, you may have the right:

- 8.1.1. **Know:** To be informed about the processing of your personal data (i.e., for what purposes, what types, to what recipients it is disclosed, storage periods and any third-party sources from which it was obtained);
- 8.1.2. **Access:** To request access to, or a copy of, any personal data we hold about you;
- 8.1.3. **Correct:** To request the rectification of your personal data, if you consider that it is inaccurate, and to be notified once it is corrected or completed;
- 8.1.4. **Erase:** To request the erasure of your personal data, if you consider that we do not have the right to hold it, and to be notified once it has been erased;
- 8.1.5. **Object to Processing:** To object to any of your personal data being processed or used for any purpose, or to request that we stop using your information;
- 8.1.6. **Intervention in Automated Decision-Making:** to request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data;
- 8.1.7. **Portability:** To ask us to transfer a copy of your personal data to yourself or to another service provider or third party, where technically feasible and otherwise required by applicable regulations;
- 8.1.8. **Restrict Processing:** To restrict us from processing your information whilst your objections or requests are being dealt with, including not erasing your information whilst you require it in relation to a legal claim;
- 8.1.9. **Withdraw Consent:** To withdraw, at any time, any consent that you have previously given to us for our use of your personal data;
- 8.1.10. **Opt Out of Marketing:** To ask us to stop or start sending you marketing messages at any time;
- 8.1.11. **Limit Sensitive Personal Information Processing:** To ask us to limit our processing and sharing of your Sensitive Personal Information to what is required to provide services to you;
- 8.1.12. **Non-Discrimination:** Not to be discriminated against for exercising any of your data protection rights; and
- 8.1.13. **Complain to Supervisory Authority:** To make a complaint to your local data protection supervisory authority.

8.2. How to Make a Request:

- 8.2.1. If you would like to contact us in relation to any of the rights set out above, please contact us using the contact details in Section 12 ("Contacting Us").
- 8.2.2. When you make a request, please provide your name, email address, country (or if in the U.S., state) of residence, and details of your connection to us (for example, your investor number), and tell us the type of request you would like to make (know, access, correct, erase, object to processing, intervention in automated decision making, portability, restrict processing, withdraw consent, opt out of marketing, non-discrimination).

- 8.2.3. We will verify your identity by asking you to provide information such as your passport or driver's licence.
- 8.2.4. If you would like an authorized agent to make a request on your behalf, they will need to follow these same procedures, and we may ask for evidence that you have authorized your agent to make this request. This evidence may include a power of attorney or something else with your valid signature that confirms the agent's authority.

### 8.3. How to Appeal:

- 8.3.1. If we deny all or part of your request, you may have the right to appeal.
- 8.3.2. If you would like to appeal our decision, please contact us using the contact details in Section 12 ("Contacting Us").
- 8.3.3. You must request an appeal within 30 days after we deny your request, and in order to appeal, you must provide us with your name, email address, country (or if in the U.S., state) of residence, type of request, details of your request (including, where applicable, any case or reference number allocated) the reason you disagree with our decision, and what you would like us to do to resolve your request.

8.4. These rights may be limited by applicable local law requirements.

## 9. Access to Your Information

- 9.1. Depending on the Data Protection Legislation applicable to your personal data, you may have a right of access to some, or all, of the information we hold about you under Data Protection Legislation. Any request for access to or a copy of your personal data may be addressed using the contact details in Section 12 ("Contacting Us"). We will endeavour to respond within the time period stipulated in the applicable Data Protection Legislation, and in any event within one month. We will comply with our legal obligations as regards any individual's rights as a data subject.
- 9.2. We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that such information is up to date, please let us know if your personal details change, by contacting us using the contact details in Section 12 ("Contacting Us"). We will correct any incorrect or incomplete information.
- 9.3. These rights may be limited by applicable local law requirements.

## 10. Retaining your Information

- 10.1. We will only process and keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above, or as required to comply with any legal obligations to which we are subject, this will generally be for two (2) to ten (10) years (subject to applicable regulatory requirements) depending on the purpose for which we collected it, and certain information will be retained permanently if needed. To the extent required under applicable Data Protection Legislation, we will regularly review our files to check that information is accurate, up to date and still required.
- 10.2. If you cease to use our services or we cease to provide services to an entity to which you are connected, or if you cease to provide us with goods or services, or you decide not to go ahead with your relationship with us, we may still keep your information as set out at Section 10.3 below.
- 10.3. We may retain information relating to you after you cease to be a client or after we cease to provide services to you, provided it is necessary for a legal, regulatory or other legitimate business purpose (including in connection with any possible disputes). We will in any event not keep your personal data for any longer than is permitted under applicable Data Protection Legislation.

## 11. Sending You Marketing Information

- 11.1. Where permitted by Data Protection Legislation, we may use your information from time to time to inform you by letter, telephone, text (or similar) messages, email or other electronic means, about similar products and services (including those of third parties) that may be of interest to you.
- 11.2. You may, at any time, request that we cease or do not send such information by one, some or all channels, by contacting us using the contact details in Section 12 ("Contacting Us").

## 12. Contacting Us / Concerns

- 12.1. If you wish to exercise any of the rights relating to your information set out above, or if you have any questions or comments about data protection, or you wish to raise a complaint about how we are using your information, you can contact our Data Protection Officer using the following details:
- 12.1.1. Email the Data Protection Officer at [datacontroller@tridenttrust.com](mailto:datacontroller@tridenttrust.com);
- 12.1.2. Write to the Data Protection Officer at 12-14 Finch Road, Douglas IM1 2PT, Isle of Man, British Isles.
- 12.2. Certain Trident Trust Group affiliates located outside of the European Union ("**EU**") have appointed representatives within the EU. If you are an EU resident, you may choose to contact the relevant EU representative for any data protection-related enquiries using the following details in addition to, or instead of, the contact details at 12.1 above:
- 12.2.1. Email the Data Protection Officer at [eudatacontroller@tridenttrust.com](mailto:eudatacontroller@tridenttrust.com);
- 12.2.2. Write to the Data Protection Officer at Trident Centre, 115 Griva Digeni Avenue, PO Box 58184, 3731 Limassol, Cyprus;
- 12.2.3. Telephone the Data Protection Officer at +357 250 60 289.
- 12.3. Certain Trident Trust Group affiliates located outside of the United Kingdom ("**UK**") have appointed representatives within the UK. If you are an UK resident, you may choose to contact the relevant UK representative for any data protection-related enquiries using the following details in addition to, or instead of, the contact details at 12.1 above:
- 12.3.1. Email the Data Protection Officer at [ukdatacontroller@tridenttrust.com](mailto:ukdatacontroller@tridenttrust.com);
- 12.3.2. Write to the Data Protection Officer at 54 Portland Place, London, United Kingdom, W1B 1DY;
- 12.3.3. Telephone the Data Protection Officer at + 44 330 236 8368.
- 12.4. If you are a U.S. resident, you may choose to contact the relevant U.S. representative for any data protection-related enquiries using the following details in addition to, or instead of, the contact details at 12.1 above:
- 12.4.1. Email the Data Protection Officer at [usadatacontroller@tridenttrust.com](mailto:usadatacontroller@tridenttrust.com);
- 12.4.2. Write to the Data Protection Officer at 1100 Abernathy Road NE, 500 Northpark Building, Suite 300, Atlanta, Georgia 30328, USA;
- 12.4.3. Telephone the Data Protection Officer at +1 833 849 4949.
- 12.5. If you have any concerns about our use of your information, you also have the right to make a complaint to your local data protection authority.

## 13. EU – U.S. Data Privacy Framework

- 13.1. Trident Fund Services Inc ("TFSI") complies with the requirements of the EU - U.S. Data Privacy Framework (EU - U.S. DPF) and the UK extension to the EU - U.S. DPF, and the Swiss - U.S. Data Privacy Framework (Swiss - U.S. DPF) as set forth by the U.S. Department of Commerce (the "Principles"). TFSI has certified to the U.S. Department of Commerce that it adheres to the Principles with respect to the processing of personal information (as described in

our Global Privacy Notice) that is received from the European Union and its Member States, the European Economic Area, the United Kingdom and/or Switzerland (“EU”) to the United States. If there is any conflict between the terms of the (TFSI) Global Privacy Notice and the Principles, the Principles shall govern. For more information about our commitments to the Framework, download our Global Privacy Notice using the link on this page. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

- 13.2. In compliance with the Principles, TFSI commits to refer resolve DPF-related complaints about our collection or use of your personal information. European Union and United Kingdom individuals and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the Principles should first contact [datacontroller@tridenttrust.com](mailto:datacontroller@tridenttrust.com).
- 13.3. TFSI has further committed to refer unresolved privacy complaints under the DPF Principles to an independent dispute resolution mechanism, Data Privacy Framework Services, operated by BBB National Programs, an alternative dispute resolution provider based in the United States. If you do not receive from us timely acknowledgment of your complaint, or if we have not addressed to your satisfaction your DPF-Principles related complaint, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information and to file a complaint. The services of BBB National Programs are provided free of charge to you.
- 13.4. If your DPF-Principles related complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/s/article/G-Arbitration-Procedures-dpf?tabset-35584=2>.
- 13.5. Pursuant to the Principles, European Union and United Kingdom individuals and Swiss individuals have the right to obtain our confirmation of whether we maintain, in the United States, personal information relating to them.
- 13.5.1. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend or delete the personal information we hold about you. An individual who seeks access to, or seeks to correct, amend or delete inaccurate data processed in the United States under the Principles should direct their query to [usadatacontroller@tridenttrust.com](mailto:usadatacontroller@tridenttrust.com). If requested to remove data, we will respond within a reasonable timeframe.
- 13.5.2. If you are the employee, officer, director, agent, contractor or consultant of one of our clients, we will provide an individual **opt-out** choice, or **opt-in** for sensitive data (i.e., personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual), before we share your data with third parties, other than with our agents or with our clients. We will also provide an individual **opt-out** choice, or **opt-in** for such sensitive data, before using your data for a purpose other than which it was originally collected or subsequently authorized.
- 13.5.3. To request us to limit the use and disclosure of your personal information, please submit a written request to [usadatacontroller@tridenttrust.com](mailto:usadatacontroller@tridenttrust.com).
- 13.5.4. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- 13.6. Our accountability for personal data that we process in the USA is described in the Principles. In particular, we remain responsible and liable under the Principles if third-party agents that we engage to process personal data on our behalf do so in a manner inconsistent with the Principles, unless we prove that we are not responsible for an event giving rise to damage.

## 14. California Privacy Notice

14.1. **"Legal Categories" of Personal Data.** Certain laws require us to tell you about the personal data we collect about you in a certain way – specifically, we need to tie it back to "legal categories" of personal data that are listed in the law. To do this, we bundled up the information we gave you above in this Privacy Notice and matched the different types of personal data we collect about you with the legal category. To make things easier to understand, we've put this information in a chart that shows you five things:

- 14.1.1. The legal category of personal data,
- 14.1.2. Examples of the types of personal data included in each legal category,
- 14.1.3. The source from which your personal data is collected,
- 14.1.4. The purpose for why we collect and use your personal data for each legal category; and
- 14.1.5. The business purposes for which we share your personal data and with whom.

We've included these things in the **California Privacy Chart** below. At the end of the California Privacy Chart, we also included a list of Personal Information We Disclose for a Business Purpose.

14.2. **Sources of Personal Data.** Depending on the circumstances, we may collect your personal data from different sources, including:

- 14.2.1. Directly from you;
- 14.2.2. From our other entities;
- 14.2.3. Automatically from your devices (e.g., when you interact with us via our website or using your computer or a mobile device);
- 14.2.4. From third parties (e.g., for background checks and diligence, or from our consultants, professionals, or advisors);
- 14.2.5. From publicly available sources, like research for background screenings); and
- 14.2.6. Crime and fraud prevention bodies, government and public bodies, or other similar organizations.

14.3. **Privacy Rights.** For all personal data that we collect about you, you may have the rights and choices described above, in Section 8 of this Privacy Notice. For any request you would like to make, we will accommodate it as long as it meets legal and regulatory requirements and does not risk making our other data less secure or changing our other data. You may also designate an authorized agent to make a request on your behalf.

### California Privacy Chart

LEGAL CATEGORY	TYPES OF INFORMATION COLLECTED	SOURCE	PURPOSE FOR COLLECTION	SHARING WITH THIRD PARTIES
A. Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license	<ul style="list-style-type: none"> <li>&gt; Directly from you</li> <li>&gt; Automatically from your devices</li> <li>&gt; From third parties</li> <li>&gt; From our other entities</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Services</li> <li>&gt; Monitoring and Analysis</li> <li>&gt; Legal Requirements</li> <li>&gt; Commercial Purposes</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Service Providers</li> <li>&gt; Revenue Service or Tax Authority</li> <li>&gt; Our Advisors</li> <li>&gt; Your Advisors</li> <li>&gt; Professional and Financial Advisors</li> </ul>

LEGAL CATEGORY	TYPES OF INFORMATION COLLECTED	SOURCE	PURPOSE FOR COLLECTION	SHARING WITH THIRD PARTIES
	number, passport number, or other similar identifiers	<ul style="list-style-type: none"> <li>&gt; Publicly available sources</li> <li>&gt; Crime and fraud prevention, public agencies</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Identity and Background Checks</li> <li>&gt; Follow Up Communications</li> <li>&gt; Safety</li> <li>&gt; Business Reorganization</li> <li>&gt; Marketing</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Government</li> <li>&gt; Courts</li> <li>&gt; Regulators</li> <li>&gt; Fraud, Terrorism, Crime Prevention Agencies</li> </ul>
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information; Some personal information included in this category may overlap with other categories	<ul style="list-style-type: none"> <li>&gt; Directly from you</li> <li>&gt; Automatically from your devices</li> <li>&gt; From third parties</li> <li>&gt; From our other entities</li> <li>&gt; Publicly available sources</li> <li>&gt; Crime and fraud prevention, public agencies</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Services</li> <li>&gt; Monitoring and Analysis</li> <li>&gt; Legal Requirements</li> <li>&gt; Commercial Purposes</li> <li>&gt; Identity and Background Checks</li> <li>&gt; Follow Up Communications</li> <li>&gt; Safety</li> <li>&gt; Business Reorganization</li> <li>&gt; Marketing</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Service Providers</li> <li>&gt; Revenue Service or Tax Authority</li> <li>&gt; Our Advisors</li> <li>&gt; Your Advisors</li> <li>&gt; Professional and Financial Advisors</li> <li>&gt; Government</li> <li>&gt; Courts</li> <li>&gt; Regulators</li> <li>&gt; Fraud, Terrorism, Crime Prevention Agencies</li> </ul>
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity,	<ul style="list-style-type: none"> <li>&gt; Directly from you</li> <li>&gt; From third parties</li> <li>&gt; Publicly available sources</li> <li>&gt; Crime and fraud prevention, public agencies</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Identity and Background Checks</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Service Providers</li> <li>&gt; Revenue Service or Tax Authority</li> <li>&gt; Our Advisors</li> <li>&gt; Your Advisors</li> <li>&gt; Professional and Financial Advisors</li> <li>&gt; Government</li> </ul>

LEGAL CATEGORY	TYPES OF INFORMATION COLLECTED	SOURCE	PURPOSE FOR COLLECTION	SHARING WITH THIRD PARTIES
	gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information)			<ul style="list-style-type: none"> <li>&gt; Courts</li> <li>&gt; Regulators</li> <li>&gt; Fraud, Terrorism, Crime Prevention Agencies</li> </ul>
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> <li>&gt; Directly from you</li> <li>&gt; From third parties</li> <li>&gt; From our other entities</li> <li>&gt; Publicly available sources</li> <li>&gt; Crime and fraud prevention, public agencies</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Services</li> <li>&gt; Monitoring and Analysis</li> <li>&gt; Legal Requirements</li> <li>&gt; Commercial Purposes</li> <li>&gt; Identity and Background Checks</li> <li>&gt; Follow Up Communications</li> <li>&gt; Business Reorganization</li> <li>&gt; Marketing</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Service Providers</li> <li>&gt; Revenue Service or Tax Authority</li> <li>&gt; Our Advisors</li> <li>&gt; Your Advisors</li> <li>&gt; Professional and Financial Advisors</li> <li>&gt; Government</li> <li>&gt; Courts</li> <li>&gt; Regulators</li> <li>&gt; Fraud, Terrorism, Crime Prevention Agencies</li> </ul>
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data	> Not collected	> Not collected	> Not collected



LEGAL CATEGORY	TYPES OF INFORMATION COLLECTED	SOURCE	PURPOSE FOR COLLECTION	SHARING WITH THIRD PARTIES
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	> Automatically from your devices	> Monitoring and Analysis > Commercial Purposes	> Service Providers
G. Geolocation data	Physical location or movements	> Not collected	> Not collected	> Not collected
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	> Not collected	> Not collected	> Not collected
I. Professional or employment-related information	Current or past job history or performance evaluations	> Directly from you > From third parties > From our other entities > Publicly available sources > Crime and fraud prevention, public agencies	> Legal Requirements > Identity and Background Checks	> Service Providers > Revenue Service or Tax Authority > Our Advisors > Your Advisors > Professional and Financial Advisors > Government > Courts > Regulators > Fraud, Terrorism, Crime Prevention Agencies
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records	> Not collected	> Not collected	> Not collected

LEGAL CATEGORY	TYPES OF INFORMATION COLLECTED	SOURCE	PURPOSE FOR COLLECTION	SHARING WITH THIRD PARTIES
K. Inferences drawn from other Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	> Not collected	> Not collected	> Not collected
L. Sensitive Personal Information as defined in § 1798.140(ae) of the California Privacy Rights Act	Social Security number, driver's license number, state ID card, passport number, precise geolocation, racial or ethnic origin, union membership, and health and genetic data	> Directly from you > From third parties > From our other entities > Publicly available sources > Crime and fraud prevention, public agencies	> Services > Legal Requirements > Identity and Background Checks	> Service Providers > Revenue Service or Tax Authority > Our Advisors > Your Advisors > Professional and Financial Advisors > Government > Courts > Regulators > Fraud, Terrorism, Crime Prevention Agencies

We may also collect information to comply with applicable law or regulatory requirements or legal requests.

In the preceding twelve (12) months, we have disclosed the following categories of personal data for a business purpose:

- > Category A: Identifiers
- > Category B: California Consumer Records
- > Category C: Protected Classifications
- > Category D: Commercial Information
- > Category F: Internet or Network Activity
- > Category I: Professional or Employment Information
- > Category L: Sensitive Personal Information

### 15.Changes to This Notice

We may make changes to this Privacy Notice and how we use your information in the future. If we do this, we'll post an updated version of this Privacy Notice on our website. You can find the current version of this Privacy Notice, which explains how we'll use your information, by visiting our website at [tridenttrust.com/legal-pages/data-protection](https://tridenttrust.com/legal-pages/data-protection).

## APPENDIX A: TRIDENT TRUST GROUP OFFICES

### USA, CANADA, CARIBBEAN AND SOUTH AMERICA

1. Trident Fund Services, Inc.<sup>1</sup>
2. Trident Corporate Services Inc<sup>2</sup>
3. Trident Trust Company (South Dakota) Inc<sup>3</sup>
4. Trident Corporate Services (USA) LLC<sup>4</sup>
5. TT Services (Canada) Limited<sup>5</sup>
6. Integritas (Canada) Trustee Corporation Limited<sup>6</sup>
7. Trident Trust Company (Bahamas) Limited<sup>7</sup>
8. Trident Corporate Services (Barbados) Limited<sup>8</sup>
9. Trident Trust Company (BVI) Limited<sup>9</sup>
10. Trident Insurance Management (BVI) Limited<sup>10</sup>
11. Trident Fund Services (BVI) Limited<sup>11</sup>
12. Trident AR (BVI) Limited<sup>12</sup>
13. Trident Trust Company (Cayman) Limited<sup>13</sup>
14. Trident Corporate Services (Panama) S.A.<sup>14</sup>
15. TT & Asociados<sup>15</sup>
16. Trident Trust Company (VI) Limited<sup>16</sup>
17. Trident Trust Company (Nevis) Limited<sup>17</sup>
18. Trident Corporate Services (Uruguay) S.A.<sup>18</sup>
19. Trident Corporate Services Brazil Ltda<sup>19</sup>

### UNITED KINGDOM

20. Trident Trust Company (U.K.) Limited
21. Trident Company Services (UK) Limited

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<sup>1</sup> Atlanta, Georgia, USA (Has Branch Office in Houston, Texas)

<sup>2</sup> Atlanta, Georgia, USA (Has Branches Offices in New York, New York and Miami, Florida)

<sup>3</sup> Sioux Falls, South Dakota, USA

<sup>4</sup> Sioux Falls, South Dakota, USA

<sup>5</sup> Vancouver, Canada

<sup>6</sup> Prince Edward Island, Canada

<sup>7</sup> Bahamas

<sup>8</sup> Barbados

<sup>9</sup> British Virgin Islands

<sup>10</sup> British Virgin Islands

<sup>11</sup> British Virgin Islands

<sup>12</sup> British Virgin Islands

<sup>13</sup> Cayman Islands

<sup>14</sup> Panama

<sup>15</sup> Panama

<sup>16</sup> US Virgin Islands

<sup>17</sup> Federation of St. Christopher and Nevis, Island of Nevis

<sup>18</sup> Montevideo, Uruguay

<sup>19</sup> San Paulo, Brazil

#### ISLE OF MAN

22. Trident (I.P.) Limited
23. Trident Administrators Limited
24. Trident Services (I.O.M.) Limited
25. Trident Trust Company (I.O.M.) Limited

#### CHANNEL ISLANDS

26. Trident Trust Company Limited<sup>20</sup>
27. Trident Trust Company (Guernsey) Limited<sup>21</sup>
28. Owen Trust Limited<sup>22</sup>
29. The Cabinet Trust Company Limited<sup>23</sup>
30. Trident Trust Marine Services Limited<sup>24</sup>

#### EUROPE AND SWITZERLAND

31. Trident Trust Company (Luxembourg) S.A.<sup>25</sup>
32. Client Audit Services S.A.<sup>26</sup>
33. Trident Corporate Services (Malta) Limited<sup>27</sup>
34. Trident Trust Company (Malta) Limited<sup>28</sup>
35. Trident Fund Services (Malta) Limited<sup>29</sup>
36. Tri Consultancy Limited<sup>30</sup>
37. Neptune Structuring Limited<sup>31</sup>
38. Trident Trust (Switzerland) AG<sup>32</sup>
39. Trident Corporate Services A.G.<sup>33</sup>
40. Integritas Services S.A.<sup>34</sup>
41. Integritas Support SL<sup>35</sup>
42. Trident Corporate Services (Spain) SL<sup>36</sup>
43. Trident Trust Company (Cyprus) Limited<sup>37</sup>

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<sup>20</sup> Jersey

<sup>21</sup> Guernsey

<sup>22</sup> Guernsey

<sup>23</sup> Guernsey

<sup>24</sup> Guernsey

<sup>25</sup> Luxembourg

<sup>26</sup> Luxembourg

<sup>27</sup> Birkirkara, Malta

<sup>28</sup> Birkirkara, Malta

<sup>29</sup> Birkirkara, Malta

<sup>30</sup> Birkirkara, Malta

<sup>31</sup> Birkirkara, Malta

<sup>32</sup> Zurich, Switzerland

<sup>33</sup> Zurich, Switzerland

<sup>34</sup> Geneva, Switzerland

<sup>35</sup> Madrid, Spain

<sup>36</sup> Madrid, Spain

<sup>37</sup> Limassol, Cyprus

#### AFRICA AND MIDDLE EAST

- 44. Trident Trust Company (UAE) Limited – DMCC Branch<sup>38</sup>
- 45. Trident Fund Services (DIFC) Limited<sup>39</sup>
- 46. Trident Trust Company (Mauritius) Limited<sup>40</sup>

#### ASIA PACIFIC REGION

- 47. Trident Trust Company (N.Z.) Limited<sup>41</sup>
- 48. Trident Trust Company (HK) Limited<sup>42</sup>
- 49. Trident Fund Services (HK) Limited<sup>43</sup>
- 50. Trident Corporate Services (Asia) Limited<sup>44</sup>
- 51. Trident Alternative Funds Services (HK) Limited<sup>45</sup>
- 52. Trident Corporate Services (Singapore) Pte Limited<sup>46</sup>
- 53. Trident Trust Company (Singapore) Pte Limited<sup>47</sup>
- 54. Trident Shared Services (Singapore) Pte Limited<sup>48</sup>
- 55. Trident Fund Services (Singapore) Pte Limited<sup>49</sup>
- 56. Trident Regional Services (Singapore) Pte Limited<sup>50</sup>
- 57. Trident Regional Services (Singapore) Pte Limited – Philippines Branch<sup>51</sup>

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<sup>38</sup> DMCC Zone, Dubai (Branch of a Nevis Company)

<sup>39</sup> DIFC, Dubai

<sup>40</sup> Ebene, Cyber City, Mauritius

<sup>41</sup> Auckland, New Zealand

<sup>42</sup> Hong Kong

<sup>43</sup> Hong Kong

<sup>44</sup> Hong Kong (Branch of a British Virgin Island Company)

<sup>45</sup> Hong Kong

<sup>46</sup> Singapore

<sup>47</sup> Singapore

<sup>48</sup> Singapore

<sup>49</sup> Singapore

<sup>50</sup> Singapore

<sup>51</sup> Pasay City, Philippines

## APPENDIX B: TRIDENT TRUST GROUP USA OFFICES PARTY TO PRIVACY FRAMEWORK

### TRIDENT TRUST GROUP OFFICE LOCATED IN THE USA AND PARTY TO THE PRIVACY SHIELD FRAMEWORKS

#### NAME OF TRIDENT TRUST GROUP OFFICE

1. Trident Fund Services, Inc., Atlanta, GA, United States

## APPENDIX C: TRIDENT TRUST GROUP USA OFFICES NOT PARTY TO PRIVACY FRAMEWORK

### TRIDENT TRUST GROUP OFFICE LOCATED IN THE USA AND NOT PARTY TO THE PRIVACY SHIELD FRAMEWORKS

#### NAME OF TRIDENT TRUST GROUP OFFICE

1. Trident Corporate Services Inc
2. Trident Trust Company (South Dakota) Inc
3. Trident Corporate Services (USA) LLC
4. Trident Trust Company (VI) Limited