

Internal Privacy Notice
(applicable to directors, officers, employees and consultants of the Company)

1. Introduction

- 1.1 This Privacy Notice is applicable to each entity (hereinafter the "**Company**") to which Standard Bank Offshore Trust Company Jersey Limited, Lumbro Corporate Services Limited and/or Cotillion Trust Company Limited (each, an "**Administrator**") render services, and all of which are carrying on trust company business under the Financial Services (Jersey) Law 1998 (as amended) respectively as Affiliation Leader and Participating Members.
- 1.2 The purpose of this document is to provide you with information on the Company's use of your personal data in accordance with the Data Protection (Jersey) Law 2018 and the Data Protection (Authority) (Jersey) Law 2018 (as the same may be amended, varied or replaced) (the "**DPL**") and to the extent that individuals within the EU are acting as directors, consultants or employees of the Company (or of one of its service providers), the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679, collectively with the DPL, hereinafter referred to as the "**Data Protection Legislation**").
- 1.3 In this document, "we", "us" and "our" refer to the Company.

2. Who this affects

- 2.1 If you are a director, officer, employee or consultant of the Company (a "**Relevant Person**"), this will affect you directly.
- 2.2 Your personal data may also be collected and processed by us as a result of your professional or family connection with a Relevant Person.

3. Your personal data

- 3.1 Certain personal data will be provided to us by virtue of you acting as a Relevant Person and your associated interactions with us (including any application and including the recording of electronic communications or phone calls where applicable) or by virtue of you otherwise providing us with personal information on individuals connected with you - for example your relatives, trustees, personal representatives or shareholders. We may also obtain personal data on you or such individuals from other public sources.
- 3.2 This personal data includes the following information relating to you and/or any individuals connected with you as a director, employee or consultant of the Company: name, residential address, email address, contact details, information needed for payroll, benefits and expenses purposes; signature, nationality, place of birth, date of birth, tax status, tax identification, correspondence records, passport number, bank account details, professional qualifications, employment history, references and other details regarding your career history such as training records. Where necessary, we may also keep information relating to your health.
- 3.3 In our use of this personal data, the Company will be characterised as a "data controller" under the Data Protection Legislation. In the event that the Company delegates certain functions to

affiliates and/or other third parties, such entities will be considered data processors and their use of your personal data will be governed by a written agreement.

- 3.4 When processing your personal data, there may also be times where other service providers to the Company will be required to use your personal data for purposes they have determined to be lawful and necessary, in which case they will be characterised as "data controllers".

4. How we may use your personal data

- 4.1 We may hold and process your personal data on the following lawful grounds:

- 4.1.1 the processing is necessary for the performance of a contract which we have with you;
- 4.1.2 the processing is necessary for our legitimate interests, provided your interests and fundamental rights do not override our legitimate interests;
- 4.1.3 the processing is necessary to comply with our legal and regulatory obligations and to establish and/or enforce our legal rights;
- 4.1.4 on rare occasions where we have obtained consent to processing personal data for a specific purpose; and
- 4.1.5 on rare occasions, where it is needed in the public interest.

- 4.2 We may collect, store and use your personal data for the lawful purposes disclosed below. Those based wholly or partly on our legitimate interests are set out in paragraphs 4.2.1, 4.2.2 and 4.2.4 to 4.2.7 inclusive:

- 4.2.1 to reflect your directorship, employment or consultancy relationship with the Company or with one of its service providers;
- 4.2.2 to comply with our obligations to maintain records of certain information under the Companies (Jersey) Law 1991 (as amended) or other enactments;
- 4.2.3 to carry out our obligations to you in connection with your directorship, employment or consultancy with the Company;
- 4.2.4 to discharge our anti-money laundering obligation to verify the identity of our directors, employees and consultants (or those of our service providers) or for prevention of fraud or for legal, regulatory or tax reporting purposes or in response to legal requests or requests from regulatory authorities (i.e. where this is necessary for compliance with a legal obligation to which we are subject). In discharging our anti-money laundering obligations we may, in certain circumstances, collect, store and process special categories of data such as information regarding criminal convictions;
- 4.2.5 communicating with our professional advisers for the purposes of obtaining professional advice;
- 4.2.6 monitoring and recording telephone and electronic communications and transactions:

- i. for quality, business analysis, training and related purposes in order to improve service delivery;
- ii. for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act); and
- iii. to enforce or defend our rights, or through third parties to whom we each may delegate such responsibilities or rights in order to comply with a legal or regulatory obligations imposed on each of us; and/or

4.2.7 for training and related purposes.

4.3 You have the right to object to processing where we rely on the legitimate interests basis to use and share your personal data.

4.4 Should we wish to use your personal data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

4.5 Please let us know if any of your personal data (including correspondence details) changes as soon as possible. Failure to provide accurate information or to update changed information may have a detrimental impact on your directorship, employment or consultancy including, the processing of any payment due to you. Failure to provide information where the same is required for anti-money laundering, pursuant to automatic exchange of information agreements or other legal requirements may mean that any payment due to you cannot be processed.

4.6 The Company does not make decisions about you based on automated processing of your personal data.

5. Why we may transfer your personal data

5.1 We may share your personal data with other entities associated with the Company and third parties, including, banks, financial institutions or other third party lenders, IT service providers, auditors and legal professionals to facilitate the running of the Company.

5.2 Where we share your information with a third party, we require the recipients of that personal data to put in place adequate measures to protect it.

5.3 Where we transfer your personal data outside of both Jersey and the European Economic Area ("EEA"), we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information. This can be done in a number of different ways, for instance:

5.3.1 the country to which we send the personal data may be approved by the European Commission as providing adequate protection for personal data;

5.3.2 by utilising a contract based on "standard contractual clauses" approved by the European Commission and adopted by the Jersey Office of the Information Commissioner, together with the Jersey Addendum to the standard contractual clauses; or

5.3.3 where the recipient is located in the US, it may be a participant of the EU-US Data Privacy Framework.

5.4 In other circumstances, the law may permit us to otherwise transfer your personal data outside of both Jersey and the EEA.

5.5 If you would like further information about the safeguards we have in place to protect your personal data, please contact the Administrator via email at DPO@standardbank.com.

6. Retention of personal data

6.1 Your personal data will be retained for as long as required:

6.1.1 for the Purposes for which the personal data was collected;

6.1.2 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or

6.1.3 as required by data protection laws and any other applicable laws or regulatory requirements.

7. Access to and control of personal data

7.1 You have the following rights in respect of the personal data about you that we process:

7.1.1 the right to access and port personal data;

7.1.2 the right to rectify personal data;

7.1.3 the right to restrict the use of personal data;

7.1.4 the right to request that personal information is erased; and

7.1.5 the right to object to processing of personal data.

7.2 You also have the right to lodge a complaint about the processing of your personal data either with us, with the Office of the Information Commissioner in Jersey (www.jerseyoic.org) or the data protection authority in the EU member state of your usual residence or place of work.

7.3 Where we have relied on consent to process your personal data, you have the right to withdraw consent at any time.

7.4 If you wish to exercise any of the rights set out in this paragraph, please contact the Administrator via email at DPO@standardbank.com.

8. Inaccurate or amended information

8.1 Please let us know as soon as possible if any of your personal data changes (including your correspondence details).

9. Questions

9.1 If you have any questions about this Privacy Notice or how we handle your personal data (e.g. our

retention procedures or the security measures we have in place), please contact the Administrator via email at DPO@standardbank.com.

10. Changes to this Privacy Notice

- 10.1 This Privacy Notice is effective from 24 July 2025 and supersedes and replaces any previous Internal Privacy Notice applicable to a Company to which the Administrator renders services.
- 10.2 We reserve the right to amend this Privacy Notice at any time without notice.