



privacy

**PRIVACY NOTICE
FOR CLIENTS**

FIRST / NAMES
GROUP



F I R S T / N A M E S
G R O U P

For information on the personal data we collect from you through your use of our website please see the First Names Group Privacy Notice for Website users here <https://www.firstnames.com/privacy>

The First Names Group is a group of entities directly or indirectly owned and controlled by First Names Holdings Limited, a company incorporated in the Isle of Man under company number 00816V.

For information on the personal data we collect through the provision of our services, please see overleaf.



1. INTRODUCTION

This Privacy Notice relates to First Names Group Limited's ("First Names Group") trust, corporate and accounting business which operate under the First Names brand and is issued on behalf of the First Names entity or entities which provide professional services to you or to an entity in which you are interested. So when we mention "we", "us" or "our" in this Privacy Notice, we are referring to the relevant company within The First Names Group responsible for processing your data.

This Privacy Notice sets out how First Names deals with your personal data which we collect in the course of you and people and entities connected with you, interacting with First Names' entities. We take privacy and security of your information seriously and will only use such personal data as set out in this Privacy Notice and in ways which are reasonably ancillary to what is set out below.

First Names has offices in a number of jurisdictions outside of the European Union. However, we have taken the decision to apply the same personal data protection standards to all locations and clients regardless of location of residency. However, some rights may only be exercisable in certain jurisdictions.

We may also act as a data controller if you or someone else provides your personal data to us in order for us to carry out our legal and regulatory obligations in connection with conducting customer due diligence ("CDD"). The identity of the relevant First Names entity responsible for your personal data in such situations can be provided to you by emailing dataprotection@firstnames.com.

References to "you" include all individuals whose personal data we collect, hold and process in the course of operating our fiduciary services business. First Names also provides funds services via its Moore Group subsidiaries. A copy of the privacy notice applicable to clients of the Moore Group of companies is available on the Moore website <https://www.mooremanagement.com/privacy/>.

Visitors to our website should review the First Names Group Privacy Notice for website users at this link <https://www.firstnames.com/privacy>.

2. CONTACT DETAILS

You can contact us in relation to data protection and your rights by email to dataprotection@firstnames.com.

3. THE PERSONAL DATA WE PROCESS

3.1 We may collect various types of personal data about you, including:

- 3.1.1 **Your identification information** (which may include your name, ID card and passport number, nationality, contact details, place and date of birth, gender, photograph and/or IP address and personal data relating to claims, court cases and convictions, politically exposed person (PEP) status, personal data available in the public domain and such other information as may be necessary for us to provide our services and to complete our CDD process and discharge its anti-money laundering and counter terrorism financing ("AML/CTF") obligations);
- 3.1.2 **Your tax status information** (which may include your tax residency, tax ID and/or tax status);
- 3.1.3 **Your contact information** (which may include postal addresses and e-mail addresses and your home and mobile telephone numbers);



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- 3.1.4 **Your family relationships** (which may include your marital status, the identity of your spouse and the number of children that you have);
- 3.1.5 **Your professional and employment information** (which may include your level of education and professional qualifications, your employment, employer's name and details of directorships and other offices which you may hold);
- 3.1.6 **Financial information, sources of wealth and your assets** (which may include details of your assets, occupation and employment information, sources of wealth, shareholdings and your beneficial interest in assets, your bank details and your credit history, details of criminal convictions (where permitted by applicable law) and disqualifications, history of bankruptcy and details of investigations by a formal official body and/or if you are named on a sanctions list, details of involvement in high risk or high profile activities and other information gathered from third party or public sources); and/or
- 3.1.7 **Records of correspondence:** (which may include records of correspondence and communications that take place between you and us, including emails, letters, meetings and telephone calls).
- 3.2 We may also collect and process personal data regarding people connected to you, either by way of professional (or other) association or by way of family relationship.
- 3.3 If we use your personal data in a way that is not set out above, we will inform you through an additional privacy notice that will explain such use. Any such additional privacy notices must be read in conjunction with this Privacy Notice.

4. WHERE WE OBTAIN YOUR PERSONAL DATA

- 4.1 We collect your personal data from the following sources:
 - 4.1.1 Personal data which you give to us, including but not limited to:
 - (a) Such other forms and documents as we may request that are completed in relation to the administration/management of any of our services;
 - (b) Information gathered through CDD carried out as part of our compliance with regulatory requirements;
 - (c) Any personal data provided by way of correspondence with us by phone, e-mail or otherwise; or
 - (d) Where applicable, through Closed Circuit Television and swipe card systems when you visit our offices in person.
 - 4.1.2 Personal data we receive from third party sources, such as:
 - (a) Your employer, or any entity on which you are appointed as a corporate officer;
 - (b) Entities in which you or someone connected to you has an interest;
 - (c) Your legal and/or financial advisors;
 - (d) Other financial institutions who hold and process your personal data; and
 - (e) Credit reference agencies and due diligence, risk assessment and screening service providers, financial crime databases for the purposes of complying with our regulatory requirements and from the public domain, including from internet searches.
 - 4.1.3 Personal data received in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act.



5. WHY WE COLLECT YOUR PERSONAL DATA

LAWFUL GROUNDS FOR PROCESSING

- 5.1 We may hold and process your personal data on the following lawful grounds:
 - 5.1.1 The processing is necessary for our legitimate interests, provided your interests and fundamental rights do not override those interests;
 - 5.1.2 The processing is necessary to comply with our contractual duties;
 - 5.1.3 The processing is necessary to comply with our legal and regulatory obligations;
 - 5.1.4 Where we have obtained your consent to the processing of your personal data for a specific purpose; and
 - 5.1.5 On rare occasions, where it is needed in the public interest.

PURPOSES OF PROCESSING

- 5.2 Pursuant to paragraph 5.1 above, your personal data may be processed for the purposes set out below (“Purposes”). The Purposes based on our legitimate interests are set out in paragraphs 5.2.1 to 5.2.7 inclusive):
 - 5.2.1 Facilitating the administration of our business and/or provision of services including undertaking statistical analysis;
 - 5.2.2 Communicating with you as necessary in connection with our services;
 - 5.2.3 Monitoring and recording telephone and electronic communications and transactions:
 - (a) For quality, business analysis, training and related purposes in order to improve service delivery; and
 - (b) For investigation and fraud prevention purposes, for performance of risk assessments, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act);
 - 5.2.4 Providing services to your employer;
 - 5.2.5 Sharing personal data with entities within our corporate group or with third parties who are contracted to provide services to us;
 - 5.2.6 Maintaining internal records and carrying out administrative and operational tasks relating to our internal management and administration;
 - 5.2.7 Disclosing your personal data to any bank or financial institution in providing our services;
 - 5.2.8 To enforce or defend our legal and contractual rights or those of third party service providers;
 - 5.2.9 To comply with legal or regulatory obligations imposed on us (including but not limited to CDD and AML/CTF obligations);



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- 5.2.10 Collecting, processing, transferring and storing CDD, source of funds information and verification data under applicable AML/CTF laws and regulations, including checks for the purposes of preventing crime, compliance with laws pertaining to money laundering, fraud, terrorist financing, bribery and corruption and international sanctions; and
- 5.2.11 Liaising with or reporting to any regulatory or governmental authority (including tax authorities and law enforcement agencies) with whom we are either required to cooperate or report to, or with whom we decide to or deem it is appropriate to cooperate with in relation to an investment, and which has jurisdiction over us, you, our clients or their respective investments.
- 5.3 Where we do not base our use of personal data about you on one of the above legal bases, we will ask for your consent before we process the personal data and this will be made clear to you at the time of the request.
- 5.4 We may share your personal data with companies within the same corporate group and third parties, (including banks, financial institutions, professional service providers or other third party lenders, IT service providers, auditors and legal professionals, screening service providers and risk assessment service providers) to facilitate the running of our business or in the context of its organisational restructuring.
- 5.5 We may share your personal data with other third parties where required or permitted by law, for example regulatory or governmental authorities, in response to a request from law enforcement agencies or when we consider disclosure to be necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of alleged, suspected or actual illegal activity.
- 5.6 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.
- 5.7 Where we transfer your personal data outside the European Economic Area, 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:
 - 5.7.1 The country to which we send the personal data may be approved by the European Commission as providing adequate protection for personal data (for example, this includes our offices in Guernsey, Jersey and the Isle of Man);
 - 5.7.2 By utilising a contract based on model contractual clauses which have been approved by the European Commission; or
 - 5.7.3 Where the recipient is located in the US, it may belong to the EU-US Privacy Shield scheme.
- 5.8 In other circumstances, the law may permit us to otherwise transfer your personal data outside the EEA.
- 5.9 If you would like further information about the safeguards we have in place to protect your personal data, please contact dataprotection@firstnames.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 Depending on where you are resident, you may have some or all of the following rights under applicable data protection laws (which may be exercisable depending on the circumstances) 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 data is erased;
 - 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, or with:
 - 7.2.1 The Office of the Data Protection Commissioner in Guernsey (<https://www.dataci.gg/>) in connection with any First Names' entities incorporated in that jurisdiction;
 - 7.2.2 The Office of the Information Commissioner in Jersey (<https://oicjersey.org>) in connection with any First Names' entities incorporated in that jurisdiction;
 - 7.2.3 The Isle of Man Information Commissioner in the Isle of Man (<https://www.inforights.im>) in connection with any First Names' entities incorporated in that jurisdiction; or
 - 7.2.4 If you are an EU resident, the supervisory authority in the EU member state of your usual residence.
- 7.3 Where we have relied on consent to process your personal data, you have the right to withdraw consent at any time. You also have the right to object to processing on the basis of legitimate interests (although this right is subject to certain exceptions).
- 7.4 If you wish to exercise any of the rights set out in this paragraph 7, please contact dataprotection@firstnames.com.



8. INACCURATE OR AMENDED INFORMATION

Please let us know as soon as possible if any of your personal data changes (including your correspondence details) by contacting us at dataprotection@firstnames.com. Failure to provide accurate information or to update information when it changes may have a detrimental impact upon our ability to provide our services.

9. 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 so to do.

10. QUESTIONS

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), or if you would like to make a complaint, please contact dataprotection@firstnames.com.





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