

Privacy Policy for RSM Channel Islands and its associated entities

1. PURPOSE

This Privacy Notice sets out the privacy practices relevant to RSM Channel Islands Services Limited (“**RSMCI**”) and explain how information is collected, how it is used, your rights and what controls you have.

We use your information strictly in accordance with all applicable laws concerning the protection of personal information and you can be assured that any information provided will only be used in accordance with this Notice. In it we explain:

- What information we may collect about you and when;
- How we might use your information;
- How we protect your information; and
- Your rights regarding the information you provide.

2. INFORMATION WE COLLECT ABOUT YOU

We have clients that are individuals and clients that are corporate entities. Of those clients that are corporate entities, they will likely represent individuals, be owned and/or managed by individuals and/or be invested in by individuals. Accordingly, we will inevitably process Personal Data in the course of our relationships with those corporate clients and they may provide us with information about staff and/or clients of theirs.

If you are an individual client, you will give us certain information directly, which may include your name, company, job function or department, address and contact details, such as your telephone number or email address.

In order to efficiently provide services, we may hold and process additional Personal Data, such as: passport/identification card details and photocopies, images, copies of utility bills, tax identification and registration number(s), details in relation to bank account(s), residential address(es) (current or historical), dates of birth, details of spouse and children (names, passport/identification cards details, birth date, tax identification and registration numbers). The type of data we collect, will depend on the nature of the service that we provide.

If you are a prospective employee, we may also hold Personal Data if you send us your CV, resume or other details of employment history in connection with an advertised job vacancy or general enquiry regarding employment opportunities with us.

We strive to maintain the accuracy of Personal Data that we hold but you must assist us with this by contacting us promptly if there are changes to the information previously provided to us or if you become aware that it is inaccurate in some way.

This is the policy for RSM Channel Islands and its associated entities.

Privacy Policy for RSM Channel Islands and its associated entities

3. PURPOSE AND BASIS FOR COLLECTING INFORMATION

If you are a client, we will only collect information in order to provide you with the services we have agreed to provide and in accordance with our Terms of Business and also to meet certain legal obligations we have (i.e. under anti money-laundering legislation). We do not collect more information than we need in order to provide you with the Services. If you do not provide us with the information we ask for, we may not be able to provide you with the Services you have asked for.

4. HOW YOUR INFORMATION WILL BE USED

If you are a client we will process your data in connection with providing the Services. We may also need to transfer Personal Data to third parties to be processed in connection with the services we provide to you, or to fulfil legal or regulatory requirements as necessary.

If you are a visitor to our website (including completing a form), make a new business enquiry or contact us with a general enquiry, we will process your data for the purpose of responding to those enquiries.

The Personal Data you provide to us will only be used for the purpose specified. We do not and will not sell, rent or trade your Personal Data.

The Personal Data may be used in a number of ways, including to:

- verify your identity
- verify identity of others authorised to act on your behalf
- perform due diligence screening
- provide you with services and to contact you
- manage your transactions
- meet financial crime prevention requirements
- meet our regulatory or legal obligations
- register or subscribe you to receive newsletters (where you have provided consent)
- when you fill out forms on our website
- when you contact us with a request

If you are a prospective employee, we will use the information you provide to liaise with you about potential employment with us including contacting you to arrange meetings or interviews.

Privacy Policy for RSM Channel Islands and its associated entities

5. DISCLOSING INFORMATION

In order to provide you with the best service in response to a business enquiry or request for information, we may pass your Personal Data to one or more firms within the RSM Network, who may then respond directly to you. In the case of transfers between members of the RSM Network, this will be done subject to our internal data protection policies and procedures.

We may also share information with third party organisations that process data on our behalf in connection with the Services that we provide to you and who support our Services. The third party organisations may include:

- another member of the RSM Network
- recruitment agencies
- supervisory or authorities (including States of Jersey departments, States of Guernsey Departments, the JFSC, the GFSC, law enforcement)
- information technology providers
- legal advisors
- due diligence screening firms
- other persons authorised to act on your behalf (including legal advisors)

We will only disclose your personal information where:

- i. We have permission to do so;
- ii. To allow us to provide services;
- iii. We are permitted by applicable law;
- iv. We are required to do so by law, court order, legal obligation (ie tax offices) or regulatory authorities;
- v. We are legally required for the purposes of prevention of fraud or other crime; or where we believe that such action is necessary to protect and defend the rights, property or personal safety of RSM Channel Islands, RSM Network and/or our personnel.

We will not share your personal data with anyone for marketing purposes.

In the case of organisations outside of Jersey, Guernsey and the European Economic Area (EEA), no Personal Data shall be transferred unless (a) we have prior written instructions for the transfer or (b) we have entered into specific contractual terms with them to ensure that they treat your personal data in way equivalent to that in which they would be required if they were established in Jersey.

Privacy Policy for RSM Channel Islands and its associated entities

6. SECURITY AND DATA RETENTION

We take appropriate measures to ensure that any Personal Data are kept secure and are kept for the duration of your use of our service. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data when transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

To safeguard against unauthorised access to personal information, all electronic personal information held by us is maintained on systems protected by secure network architectures that contain firewalls and intrusion-detection devices. The servers holding personal information are “backed-up” on a regular basis in an effort to avoid any inadvertent erasure or destruction of such personal information and are stored in facilities with appropriate security and fire-detection and response systems.

In the absence of other instructions from our clients, or unless otherwise required for legal or regulatory purposes, it is our normal practice to retain correspondence and other papers for at least ten years and to periodically destroy those which are more than ten years old (other than documents which we consider may be of continuing significance).

7. YOUR RIGHTS

The updated data protection legislation provides data subjects with a number of rights. These include:

- i. The right to know what type of Personal Data we hold, details about how we use it and the right to be provided with a copy of the personal data held;
- ii. The right to have an errors or omissions corrected;
- iii. In certain circumstances, the right to request erasure of personal data that we hold;
- iv. The right to request we restrict the processing of personal data;
- v. The right to object to the further processing of personal data, including the right to object to direct marketing;
- vi. The right to withdraw consent where previously given to process your data;
- vii. The right to request that Personal Data be moved to a third party;
- viii. The right to lodge a complaint.

When a request is received about Personal Data, we will consider any exemptions that may apply. It is possible that there is something that may prevent us from responding to a request. If that is the case, we will explain this in writing when we respond to a request.

Privacy Policy for RSM Channel Islands and its associated entities

8. DISCLOSING INFORMATION

We aim to meet the highest standards when processing Personal Data.

If at any stage you became dissatisfied with the manner in which we collect, hold or process your Personal Data, please contact us.

Third Floor, 40 Esplanade
St Helier, Jersey
JE2 3QB
Tel +44 (0) 1534 816 000

You can also contact us by email at info@rsmci.com.

Clients of our Guernsey qualified auditor, RSM CI(Audit) Limited have the right to contact the Guernsey Data Protection Authority c/o Information Commissioner, and clients of all other group companies have the right to contact Jersey's Data Protection Authority c/o the Information Commissioner.

If you have any questions or concerns in relation to the content of this notice should be directed to your normal RSM Channel Islands contact.

Last updated 8 January 2019