

Trustee Privacy Notice



At ZEDRA, we take the protection of your personal data seriously and maintaining the integrity and confidentiality of your personal data is very important to us.

This Trustee Privacy Notice confirms how the ZEDRA Group of companies (the “ZEDRA Group” or each a “ZEDRA Company”) who are subject to applicable data protection laws collect, use and disclose personal data when providing trustee services (the “Services”). This Trustee Privacy Notice also confirms your rights as a data subject.

The main body of this Trustee Privacy Notice is supplemented with specific information for each country in which we operate. Please see the relevant country-specific provisions included in the Annex to this notice for more information.

ZEDRA Group's processing of personal data is subject to various data protection laws. If this Trustee Privacy Notice conflicts with applicable local law in your jurisdiction, the local law supersedes this notice. If the information in the main body of this Trustee Privacy Notice conflicts with the relevant country-specific information, the country-specific information overrides the main body of this notice.

In this Trustee Privacy Notice, “you” refers to the individual whose personal data we are processing and “us”, “we” and “our” refers to the relevant ZEDRA Company acting as trustee. A list of the ZEDRA Companies can be found at www.ZEDRA.com/locations/.

1. What personal data do we process and for what purposes?

We collect your personal data in a variety of ways such as:

- in most cases, from the information and documentation that you provide including by filling in forms or by corresponding with us by post, phone and email;
- from third parties, such as other clients, counterparties, sanctions and background check providers;
- from other ZEDRA companies or employees; and
- from publicly available sources.

We've set out the specific categories of personal data we collect, use and process and the reasons why we collect, use and process that data in the table below. We do not carry out all of these data processing activities in all jurisdictions in which we operate. For example, we don't carry out such processing if it is unlawful or unnecessary in a jurisdiction.

Personal Data we process	Why do we process it?
• Name, company name, job title, telephone numbers, email addresses, postal address (“Contact Details”). • Passport number, driving license, utility bill or bank statement (to confirm address), date of birth, source of funds/wealth, previous convictions / offences, nationality and residency (“Identity Data”).	• Onboarding you or your organisation as a client – conducting know your client (KYC), anti-money laundering (AML) and sanctions checks.
• Contact Details. • Information about client structures, investor details and anything else that is involved in providing our service including sensitive information regarding health (“Information for Services Delivery”).	• Providing trustee services and maintaining the financial and other personal data we are required to keep under the professional rules we are subject to and by law, including our obligations to HM Revenue and Customs.
• Bank account details and billing address (“Financial Data”).	• Sending funds to you where this is required.
• Contact Details. • Information about your preferences in receiving marketing from us (“Marketing Data”).	• Sending you marketing information.

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2. Sharing your personal data

Our work for you may require us to provide the personal data we hold on you to various third parties such as:

What personal data?	Who do we share it with?	Why do we share it?
- Contact Details; - Identity Data.	ZEDRA Companies.	To ensure we are able to operate on a group basis and provide services efficiently.
	Courts, regulatory authorities, tax authorities, ombudsmen, law enforcement agencies, credit reference agencies or similar bodies in any jurisdiction whether such requirements have the force of law or whether not such disclosure may be enforced on us or any ZEDRA Company.	To comply with legal or regulatory obligations, respond to lawful requests, or cooperate with investigations.
	Professional advisers, such as accountants, lawyers or auditors.	Where we are required to do so to comply with our legal obligations or to defend or protect our rights.
	Third parties and service providers such as banks and investment houses.	To fulfil our regulatory and other legal obligations (e.g., for compliance and KYC).
Financial Data	Banks and other financial institutions	To transfer funds and / or assets to you.
- Contact Details; - Identity Data; - Financial Data	Other Trustees	To newly appointed Trustees

Where appropriate we will obtain confidentiality agreements from any such relevant external sources including where we outsource any business support functions.

In some jurisdictions, we are also required to have, and to inform you of, the legal basis (or “ground”) we rely upon for each use of your personal data listed above. “Legal bases” are the legal reasons for our use of your personal data – these are set out in applicable data protection laws. If a jurisdiction requires us to have a legal basis, we cannot use your personal data without one. Please see the relevant country-specific section for more information about the legal bases we rely on in the jurisdictions in which we operate.

3. Automated decision-making

We do not conduct automated decision making or profiling using your personal data.

4. International data transfers

In sharing your personal data for the reasons set out in this Trustee Privacy Notice, we may need to transfer it to countries outside the country in which you reside. In particular, ZEDRA’s servers are located in the UK, Jersey, Luxembourg and Switzerland, which means your personal data may be transferred to any one of these locations when being shared within the ZEDRA Group. We may also need to transfer your personal data to Singapore, Hong Kong and the US for the purposes of administration and ongoing compliance relating to the Services.

Any such transfers will be carried out in accordance with applicable data protection laws, and we will ensure that appropriate safeguards are in place to protect your personal data.

Where we are required by the law in the countries in which we operate to provide you with further details about international data transfers from that jurisdiction, you will find these details in the country-specific provisions included in the Annex to this notice.

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5. Retention of your data

We may retain your personal data for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable or regulatory requirements in order to meet our legal and regulatory obligations but we may retain your personal data for a longer period where necessary for other legal or regulatory reasons, to respond to questions or complaints, and to defend any legal claims.

6. Your rights as a data subject

You may have certain rights and choices (with certain limitations and exceptions) regarding our processing of your personal data. These rights vary depending on the ZEDRA Company with which you engage so please see the relevant country section below for more information about the rights you have over your personal data.

If you would like to exercise your data subject rights, please use the contact information below.

7. Is it necessary for you to provide personal data to receive our services?

You are under no statutory or contractual obligation to provide data to ZEDRA. However, if you do not provide certain information, we will not be able to onboard you as a client and/or provide you with legal services.

8. Contact details

If you have any questions about the processing of your personal data, or you wish to exercise any of your rights, please contact our Data Protection Lead at:

By email – dataprotection@zedra.com

If you are not satisfied with our processing of your personal data, or how we respond to, or deal with, your data protection enquiry, you can make a complaint to the local regulator. See the country-specific section for these details.

9. Review

We may amend this Trustee Privacy Notice from time to time to reflect any changes in the way that we process personal data.

Dated: 1st June 2026

Annex: Country-Specific Sections



Additional information for individuals whose personal data is subject to the data protection laws of the European Economic Area (EEA), Isle of Man (IOM), Jersey, Guernsey and the United Kingdom (UK).

1. Legal grounds for processing your personal data

In addition to the information provided above regarding the types of personal data we process and the reasons for processing, data protection laws in the EEA and UK, require us to specify the legal basis for each processing activity. The table below sets out the relevant legal bases that apply to the processing of your personal data in these jurisdictions, in line with applicable data protection laws:

Personal Data we process	Why do we process it?	What's our lawful basis?
- Contact Details; - Identity Data.	Onboarding you or your organisation as a client – conducting know your client (KYC), anti-money laundering (AML) and sanctions checks.	Compliance with our legal obligations to conduct such checks.
- Contact Details; - Information for Services Delivery.	Providing trustee services and maintaining the financial and other personal data we are required to keep under the professional rules we are subject to and by law, including our obligations to HM Revenue and Customs.	- To perform the contract we have with you or because it is in our legitimate interests to fulfil the contract we have with the company you represent. - Compliance with our legal and regulatory obligations.
Financial Data.	Sending funds to you where this is required.	To perform the contract we have with you or because it is in our legitimate interests to fulfil the contract we have with the company you represent.
- Contact Details; - Marketing Data.	Sending you marketing information.	Your consent, where we are legally required to obtain your consent or because it is in our legitimate interests to market our services.

2. Sharing your personal data

Where we share your personal data with third parties, we do so in accordance with the requirements of EU and UK applicable data protection laws. The table below provides further detail on the lawful bases for sharing your personal data, supplementing the information already provided above about what data is shared, with whom, and for what purposes:

Annex: Country-Specific Sections



What personal data?	Who do we share it with?	Why do we share it?	What's our lawful basis for sharing?
- Contact Details; - Identity Data.	ZEDRA Companies.	To ensure we are able to operate on a group basis and provide services efficiently.	As necessary for our legitimate interests in managing our business and providing services, or as necessary to fulfil our contractual obligations.
	Courts, regulatory authorities, tax authorities, ombudsmen, law enforcement agencies, credit reference agencies or similar bodies in any jurisdiction whether such requirements have the force of law or whether not such disclosure may be enforced on us or any ZEDRA Company.	To comply with legal or regulatory obligations, respond to lawful requests, or cooperate with investigations.	Compliance with legal obligations, or as necessary for our legitimate interests in defending our rights and interests.
	Professional advisers, such as accountants, lawyers or auditors.	Where we are required to do so to comply with our legal obligations or to defend or protect our rights.	Compliance with legal obligations, or as necessary for our legitimate interests in defending our rights and interests.
	Third parties and service providers such as banks and investment houses.	To fulfil our regulatory and other legal obligations (e.g., for compliance and KYC).	Compliance with legal obligations.
Financial Data	Banks and other financial institutions	To transfer funds and / or assets to you.	To perform the contract we have with you or because it is in our legitimate interests to fulfil the contract we have with the company you represent.
- Contact Details; - Identity Data; - Financial Data	Other Trustees	To newly appointed Trustees	To perform the contract we have with you or because it is in our legitimate interests to fulfil the contract we have with the company you represent.

3. International data transfers

In the event we transfer your personal data around the ZEDRA Group, we do so on the basis of an International Data Transfer Agreement, which includes the European Commission's Standard Contractual Clauses, as set out in the Annex to Commission Decision 2010/87/EU ("**EU SCCs**") and the ICO's International Data Transfer Addendum to the EU SCCs ("**UK Addendum**"). The Jersey Data Protection Authority's Jersey Addendum to the EU SCC's ("**Jersey Addendum**"); the Guernsey Office of the Data Protection Authority's Addendum to the EU SCC's ("**Guernsey Addendum**"); an Addendum to the EU SCCs varied to comply with the Cayman Islands Data Protection Act (as revised) ("**Cayman Addendum**"); and an Addendum to the EU SCCs varied to comply with the British Virgin Islands Data Protection Act, 2021 (the "**BVI Addendum**").

Where we transfer your personal data to third parties, we ensure that any country to which your personal data is sent is the subject of an adequacy decision by the European Commission or UK Government. If this is not the case, we will use the appropriate legal instruments, which may include entering into appropriate EU SCCs and/or the UK Addendum, the Jersey Addendum, the Guernsey Addendum, the Cayman Addendum, and/or the BVI Addendum where legally required.

If you wish to obtain more information on how we transfer your personal data or wish to obtain a copy of the legal instruments implemented, contact the Data Protection Lead using the details provided on [page 3](#).

Annex: Country-Specific Sections



4. Your rights as a data subject

Under applicable data protection laws, you have a number of rights available, namely the right to:

- **access** your personal data;
- **correct** incomplete/ inaccurate data;
- **erase** the personal data we hold about you;
- **restrict** how we handle your personal data;
- ask us to **transfer your personal data** to a third party;
- **object** to how we process your personal data; and
- **withdraw your consent** at any time.

You have the right to withdraw your consent to ZEDRA's processing of your personal data at any time, where we rely on your consent as the lawful basis for processing. If you wish to withdraw your consent, please contact the Data Protection Lead using the details provided below.

In addition, please note that some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when the rights may not apply at all.

To exercise these rights, please contact the Data Protection Lead using the details provided on [page 3](#).

5. Complaints

If you want to make a complaint about how we have handled your personal data, we ask that you contact the Data Protection Lead in the first instance using the details provided above, who will investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal data in line with the law, you also have the right to complain to the regulator. Where you are in the EU, you may contact your local Supervisory Authority – a full list of Supervisory Authorities in the EU can be found [here](#). In the Isle of Man, the relevant regulator is the Isle of Man ICO, and you can find out more about how to make your complaint via the Isle of Man ICO's website [here](#). In the UK, the relevant regulator is the ICO, and you can make your complaint via the ICO's website [here](#).

In Jersey, the relevant regulator is the Jersey Office of the Information Commissioner ("JOIC"), and you can make your complaint via the JOIC website [here](#). In Guernsey, the relevant regulator is The Office of the Data Protection Authority ("ODPA"), and you can make your complaint via the ODPA website [here](#).

In the Cayman Islands, the relevant regulator is the Cayman Islands Ombudsman, and you can make your complaint via the Ombudsman's website [here](#).

In BVI, the regulator named in the Data Protection Act, 2021 is the Information Commissioner, but as at the date of this Employee Privacy Notice no one has been appointed to that office.

Annex: Country-Specific Sections



Additional information for individuals whose personal data is subject to the data protection laws of Switzerland.

1. International Transfer

ZEDRA processes and stores personal data primarily in the countries listed in Section 4 of the ZEDRA Trustee Privacy Notice, but potentially in any country in the world in exceptional cases – for example through sub-contracted processors of our service providers.

If a recipient is located in a country without adequate statutory data protection (as decided by the Federal Council and in accordance with Annex 1 of the Swiss Ordinance on Data Protection), we require that the recipient undertakes to comply with Swiss and EEA data protection standards (for this purpose, we use the revised European Commission's standard contractual clauses, which can be accessed [here](#), including the addendum necessary for Switzerland), unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on a derogation. A derogation may apply for example in the event of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if the data has been made generally available by you and you have not objected to the processing.

2. Your rights as a data subject

Under the Swiss DPA, you have certain rights in connection with our processing of your data. You may in particular request information about the processing of your personal data, request the correction of inaccurate personal data, request the erasure of personal data, object to data processing, request the surrender of certain personal data in a commonly used electronic format or its transfer to other controllers.

Please note that these rights are subject to prerequisites, exceptions or restrictions (e.g. to protect third parties or business secrets). We reserve the right to redact copies for reasons of data protection law or confidentiality or to deliver them only in excerpted form.

If you don't agree with the way we handle your rights or with our data protection practices, please let us know (see Section 8 for the necessary contact details). You can also contact the Federal Data Protection and Information Commissioner [here](#).

Annex: Country-Specific Sections



Additional information for individuals whose personal data is subject to the Hong Kong Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong).

1. Direct marketing

We intend to use your personal data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

- (a) any or all of your personal data may be used for direct marketing;
- (b) any services and/or products that we or our group companies, or of other third parties may be marketed;
- (c) we may receive money or other property in return for providing the personal data to the other persons for direct marketing purposes and, when requesting your consent, we will inform you if we will receive any money or other property in return for providing the personal data to the other persons.

If you do not wish for us to use or provide to other persons with your personal data for use in direct marketing as described above, you may exercise your opt-out right by notifying us.

2. Your rights as a data subject

Under applicable data protection laws, you have a number of rights available, namely the right to:

- **access** your personal data through a data access request;
- **correct** incomplete/ inaccurate data through a data correction request; and
- **ascertain** our policies and practices in relation to personal data.

In order to enable us to process any data access or data correction request, the person making such request will have to provide information to verify his/her identity and his/her right to access or correct the personal data. We may charge a fee for processing a data access or data correction request which must not be excessive.

To exercise these rights, please contact the Data Protection Lead using the details provided on [page 3](#).