

PRIVACY NOTICE

ALPADIS TRUST (HK) LIMITED AND/OR ALPADIS SECRETARIES (HK) LIMITED

1. INTRODUCTION

- 1.1. Alpadis Trust (HK) Limited and/or Alpadis Secretaries (HK) Limited (“**Alpadis**”) are part of the Alpadis Group (see point 1.6 below for more details). As part of the Alpadis Group, we are committed to protecting and respecting your privacy by complying with the EU General Data Protection Regulation 2016/679 (“**GDPR**”), when applicable, The Personal Data (Privacy) Ordinance (Cap. 486) (“**Ordinance**”) and any other locally applicable data protection laws.
- 1.2. This data protection privacy notice (“**Privacy Notice**”) lets you know what happens to any personal data that you give to us, or any that we may collect from or about you. Subject to section 1.3, it applies to all services and instances where we collect your personal data.
- 1.3. This Privacy Notice does not apply to the collection of personal data through our website or through cookies with respect to which personal data Alpadis can be considered a data controller. In this regard please see our separate [privacy statement](#) and [cookies policy](#) at www.alpadis-group.com.
- 1.4. This Privacy Notice is available through the Alpadis Group website at www.alpadis-group.com. Alpadis Group reserves the right to update this Privacy Notice without consulting or pre-informing you.
- 1.5. Alpadis (in this Privacy Notice, “**us**”, “**we**” and “**our**”) is the data controller of your personal data, this is, we determine the purposes and means of the processing of that personal data.
- 1.6. The Alpadis Group comprises the following entities:
 - 1.6.1. Alpadis Group Holding S.A.
 - 1.6.2. Alpadis (Singapore) Pte. Ltd.
 - 1.6.3. Alpadis Trust (HK) Limited
 - 1.6.4. Alpadis Secretaries (HK) Limited
 - 1.6.5. Alpadis Trust (Labuan) Ltd.
 - 1.6.6. Alpadis Trust (Switzerland) Ltd.
 - 1.6.7. Alpadis (Malaysia) Snd. Bhd.

And any subsidiaries of the above mentioned entities.

2. PERSONAL DATA

- 2.1. We may collect the following categories of personal data about you:
 - 2.1.1. your name and contact information such as your home or business address, email address and telephone number;

- 2.1.2. biographical information which may confirm your identity including your date of birth, gender, tax identification number, passport number or national identity card details, nationality and/or country of residence;
- 2.1.3. information in relation to your financial situation such as income, expenditure, assets and liabilities, sources of wealth, as well as bank account details;
- 2.1.4. information about your employment, education, family or personal circumstances, and interests, where relevant;
- 2.1.5. information to assess whether you may represent a politically exposed person or money laundering risk.

3. COLLECTION OF PERSONAL DATA

- 3.1. We will collect your personal data from different sources, for example:
 - 3.1.1. from you directly, and any information from family members, if/where relevant;
 - 3.1.2. from other companies in the Alpadis Group;
 - 3.1.3. from your agents, advisers, intermediaries, custodians of your assets, or others who are a part of providing your services or operating our business;
 - 3.1.4. from publicly available sources or from third parties, most commonly where we need to conduct background checks about you.

4. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

- 4.1. We rely on the following legal basis to process your personal data:
 - 4.1.1. the processing is necessary to perform a contract with you to provide you with our services;
 - 4.1.2. the processing is necessary for us to comply with our legal obligations;
 - 4.1.3. the processing is necessary for our legitimate interests or for the legitimate interests of a third party. In this respect, we will make sure that we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests;
 - 4.1.4. you have given clear consent to us to process your personal data for a specific purpose.

5. PURPOSES FOR WHICH WE MAY PROCESS YOUR PERSONAL DATA

- 5.1. The purposes for which we may process personal data are:
 - 5.1.1. on-boarding you as a client; and compliance with our internal compliance requirements, policies and procedures;
 - 5.1.2. maintaining and updating your contact information where appropriate;
 - 5.1.3. marketing activities. Please see also section 7 of this Privacy Notice;
 - 5.1.4. providing you with information or assistance that you request from us;



- 5.1.5. conducting verifications, monitoring and reporting in accordance with anti-money laundering and counter terrorist financing laws;
- 5.1.6. providing you with the services requested, including administration, corporate or accounting services, amongst others;
- 5.1.7. notifying you about changes to our services;
- 5.1.8. monitoring and improving the quality of our services;
- 5.1.9. training our staff;
- 5.1.10. managing our business, including recovering money you owe to us, archiving or statistical analysis;
- 5.1.11. seeking advice on our rights and obligations, such as where we require our own legal advice;
- 5.1.12. complying with requests for information from tax authorities or any competent court or legal authority.

6. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

- 6.1. We may disclose your personal data to other entities within Alpadis Group, for legitimate business purposes, including providing services to you, in accordance with applicable law. In addition, subject to binding contractual obligations of confidentiality where applicable, we may disclose your personal data to:
 - 6.1.1. your agents, advisers, intermediaries, and custodians of your assets who you tell us about;
 - 6.1.2. our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
 - 6.1.3. our data storage providers;
 - 6.1.4. private firms and/or government authorities when they are conducting audits for compliance, finance and/or accounting purposes;
 - 6.1.5. third parties whom we engage to assist in delivering the services to you, including financial institutions and asset managers;
 - 6.1.6. third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business;
 - 6.1.7. third parties who assist us in conducting background checks;
 - 6.1.8. governmental, legal, regulatory, or similar authorities, central and/or local government agencies, upon request or where required, including for the purposes of reporting any actual or suspected breach of applicable law or regulation.

7. MARKETING

- 7.1. We may send you marketing information about news, activities and services which we believe might be of interest to you.



- 7.2. We will be sending the marketing information to you in a number of ways, including by post, email or other electronic means.
- 7.3. If you do not want to receive our communications, you can withdraw your consent at any time just by sending an empty email to unsubscribe@alpadis-group.com. Please note that all processing of your personal data will cease once you have withdrawn consent but this will not affect any personal data that has already been processed prior to this point.

8. INTERNATIONAL TRANSFERS OF PERSONAL DATA

- 8.1. We are based in Hong Kong. Because of the international nature of our business, we may need to transfer your personal data within Alpadis Group, and to third parties as noted above in connection with the purposes set out in this Privacy Notice. For this reason, we may transfer your personal data to other countries that may have different laws and data protection compliance requirements. Where we transfer your personal data to other countries we will make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply.
- 8.2. To find out more about international transfers by us of your personal data and the countries concerned please contact us at data.protection@alpadis-group.com.

9. RETENTION OF YOUR PERSONAL DATA

- 9.1. We will only retain your personal data for as long as necessary to meet any of the purposes for which it was collected or as required by law. In the majority of cases this will be for at least five years from the end of your business relationship with us.

10. DATA SECURITY

- 10.1. We have implemented appropriate technical and organizational security measures designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of processing, in accordance with applicable law.
- 10.2. You are responsible for ensuring that any personal data that you send to us are sent securely.

11. YOUR LEGAL RIGHTS

- 11.1. Subject to applicable law, you may have a number of rights regarding the processing of your personal data, including:
 - 11.1.1. The right **to be informed** about the processing of your personal information;
 - 11.1.2. The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
 - 11.1.3. The right **to object** to processing of your personal information;
 - 11.1.4. The right **to restrict processing** of your personal information;
 - 11.1.5. The right **to have your personal information erased** (the “right to be forgotten”);
 - 11.1.6. The right to **request access** to your personal information and to obtain information about how we process it;

- 11.1.7. The right to **move, copy or transfer your personal information** (“data portability”);
 - 11.1.8. Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**;
- 11.2. The above-mentioned rights do not apply in all circumstances. To exercise one or more of these rights, or to ask a question about these rights please use the contact details provided in section 12 of this Privacy Notice.

12. CONTACT DETAILS

- 12.1. If you have any comments, questions or concerns about any of the information in this Privacy Notice, or any other issues relating to the processing of your personal data please contact us:
- 12.1.1. by post, to: Alpadis Trust (HK) Limited and/or Alpadis Secretaries (HK) Limited
Unit 1307, 13/F
Sunlight Tower
248 Queen’s Road East
Wanchai, Hong Kong
 - 12.1.2. by telephone, on +852 2639 3600; or
 - 12.1.3. by email, at data.protection@alpadis-group.com

Last updated: June 2019



ACKNOWLEDGMENT AND CONSENT TO THIS PRIVACY NOTICE

By signing this Privacy Notice, you are confirming that you have read this Privacy Notice and that you are consenting to Alpadis holding and processing your personal data for the above-mentioned purposes as set out in Sections 5 of the Privacy Notice. You consent on your own behalf and duly authorised on behalf of any third party whose personal data you supply.

Name:

Date: