

Fair Processing Notice

Introduction

This Fair Processing Notice will help you to understand what information we collect and process in relation to the services we provide as trustee, corporate services provider, accountants, and tax compliance.

When we refer to “Rawlinson & Hunter”, “R&H” or “R&H Bermuda entities” within this Fair Processing Notice, we are referring to the Bermuda Rawlinson & Hunter entities listed below, which have their registered office and premises as 3rd Floor, 5 Reid Street, Hamilton HM 11, Bermuda.

Registered Entities

- R & H Trust Co. (Bermuda) Limited
- R&H Services Limited and all subsidiaries
- R&H Management Limited

Data protection framework

We have developed this Fair Processing Notice in line with the Bermuda Personal Information Protection Act 2016 (“PIPA”) and the EU General Data Protection Regulation (“GDPR”), which took effect on 25 May 2018.

R&H has developed and implemented a data protection framework, which is the set of policies and procedures needed to ensure that the collection and processing of personal data is carried out in accordance with relevant legislation and good practice in a consistent way.

The personal data we collect and process

We only request and collect the personal data necessary to perform the related services we provide. The lawful basis for this is to allow the completion of agreed services with you and to comply with our legal obligations to local and global regulatory requirements.

The current set of personal data that we collect, process, and if applicable report is shown in Appendix A.

R&H will at all times handle and store your personal data in accordance with industry best practice for technical and cyber security controls, which includes the practices of our own employees as well as the third-party software providers we use.

Sensitive personal data

We may occasionally receive from you sensitive personal data that we did not request or need. When this happens, we will always ensure that data is handled in a secure manner.

Our personal data retention policy

We would usually hold data for a minimum of 7 years; however, while we are providing services to our clients, we typically keep all personal data indefinitely if, in our view it may be needed to defend a decision or advice we have provided. We do reserve the right to delete historical, inactive data where it is no longer covered by a regulatory requirement.

Your rights under data protection legislation

PIPA significantly enhances individuals' rights and as the processor of your personal data, our role is to help you respond when you exercise those rights. Not all of the rights provided for under PIPA apply to every service, but we have included them all for completeness.

- Access – individuals can request what processing is being done and will be provided with access to their personal data, in addition to prescribed information about how it has been processed
- Rectification – individuals can have their personal data corrected if it is inaccurate or incomplete
- Erasure – individuals can request that their personal data be erased in certain circumstances
- Restriction of processing – individuals can require organisations to restrict the processing of their personal data in certain circumstances
- Data portability – individuals can receive the personal data that they have given to an organisation in a 'structured, commonly used and machine-readable format'
- Objections – individuals can object to the processing of their data in a number of defined circumstances
- Automated decision making or profiling – individuals have the right not to be subject to a decision based solely on automated processing, including profiling.

If R&H does not address your request or fails to provide you with a valid reason why we have been unable to do so, you have the right to contact the Privacy Commissioner's Office to make a complaint. They can be contacted via their website (<https://www.privacy.bm>) or by telephone on (441) 543 7748.

Use of third-party service provider

Our IT infrastructure is supported by Gnosis Limited and hosted on-premises as well as off-site in an Azure Data Center located in Bermuda. All data is replicated and stored securely in Azure Recovery Services Vault located in Canada East, thus providing a robust disaster recovery position.

In the course of performing our services, it is possible that your personal data will need to be sent to a limited number of third parties, including, but not limited to:

Banking institutions, professional advisors, Truth Technologies (a compliance software company), regulators, and authorities.

In certain other non-routine situations, we may be asked to provide personal data, in which case, we will seek your prior approval. Before exchanging data with third parties, we will satisfy ourselves that they adhere to data protection principles.

Changes to this Fair Processing Notice

If, for any reason, this Fair Processing Notice changes substantially, we will let you know either by direct letter correspondence or posting to the Rawlinson & Hunter International website.

Contacting R&H

If you have any questions about this Fair Processing Notice, and would like to exercise any of your statutory rights, or to make a complaint, please speak with your Client Director or contact us at:

Rawlinson & Hunter
3rd Floor
5 Reid Street
Hamilton HM 11 Bermuda

Data Protection Officer: Karla Thomas

privacy@rawlinson-hunter.bm

Appendix A – Examples of Personal data and information that may be collected

This appendix provides examples of data and information we may collect and process on your behalf to complete the services offered i.e., Trust, individual or individuals' interest in a company.

Names	Date of Birth	Tax Identification Number
Address	Income details	Allowances
Phone numbers	Pension details	Charitable giving/activity
Email address	Wealth details	Child benefit details
Employment details	Business partner details	Tax adviser's details
Bank account details	Spouse/partner details	Company information
Passport details	Shareholding information	Financial Statements

The above is not intended to be an exhaustive list.