Introduction

Your privacy is very important to Dixcart. All data obtained by Dixcart is processed in accordance with the relevant data protection laws.

This Privacy Statement applies to Dixcart Trust Corporation Limited and their subsidiaries ("Dixcart").

Personal data

Under the EU's General Data Protection Regulation ("GDPR") and the Data Protection (Bailiwick of Guernsey) Law, 2017 (the "Guernsey Data Protection Law") personal data is any information relating to an identified or identifiable individual (called a "data subject"). Individuals are considered "identifiable" if they can be identified, directly or indirectly, such as by name, identification number, location data, an online identifier or by factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity.

How we use your information

The personal data we collect from you will be used:

- to provide corporate or trustee services according to contracts that we have and to take steps to enter into corporate and trustee service contracts
- to exercise the fiduciary duties that we have
- to conduct due diligence and identity verification as required by our policies and laws preventing financial crime
- if you are a job applicant, to evaluate your appropriateness for a job
- if you are an employee, to fulfil our responsibilities under your job contract (such as providing pay and benefits), to fulfil our legal responsibilities such as providing your information to tax and social security authorities, to evaluate and supervise you to ensure you are fulfilling your job contract and applicable law, and to make sure that people can contact you as necessary for you to perform your job tasks
- if you are a director or top manager, your biographical data and contact details will appear on our website and marketing materials in the interests of advertising our business and letting clients know whom to contact
- to protect our information systems by making copies, archives and backups
- to apply for or fulfil our insurance policies, in the interests of protecting our business
- if our business relationship with you ends, your information may be kept for a period to obey the regulations that apply to us and so that any outstanding issues or disputes may be resolved fairly and efficiently (see "How long will Dixcart retain my data?" below)
- if you give us permission, to let you know about our other products and services and about information that we think may interest you

In addition to the data provided by you, we may be required by local regulation to collect data from third parties such as Thomson Reuters World Check (online customer screening) and similar screening services and other public sources such as Google.

Why does Dixcart need to collect and store personal data?

In order to provide you with the services in your contract (or the contract with a person or entity connected to you) we need to collect personal data. We are also required to collect and maintain your data in accordance with relevant anti-money laundering and terrorist financing regulations, which require the collection of due diligence documents and information in order to identify and mitigate any potential risk in this regard. We are also required to process data in compliance with other legal and regulatory requirements including, as an example, automatic exchange of information laws such as the Common Reporting Standard. If we do not have the required personal data from you to fulfil these legal duties, we may be forced to refuse, suspend or terminate our contract with you or a client with which you have a connection.

In some instances, Dixcart may ask for your consent to process your personal data for specific purposes. You may withdraw consent at any time by notifying the Company in writing of your withdrawal of consent. Please note that your withdrawal of consent will not affect how we used your personal data before you withdrew that consent. We may also have other legal reasons to process your personal data which may not be affected by whether or not we have your consent.

Criminal data and political opinion are classed as “special category data” under the Guernsey Data Protection Law. We may need to collect information about your political connections and criminal accusations, investigations, findings and punishments as required under laws combatting financial crime. Some laws fighting financial crime may forbid us to tell you where such information is collected. Where we are asking for special category data for any reason, other than in connection with our responsibilities in combatting financial crime, we will tell you why and how the information will be used.

We are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy.

Will Dixcart share my personal data with anyone else?

In fulfilling our contract with you or the person or entity connected to you, Dixcart may pass your personal data to third parties. This may include, for example, banks, investment advisors, custodians, governments and regulators as may be needed for them and Dixcart to provide the relevant services or as may be required by any relevant legal, regulatory or contractual requirement. Dixcart may also pass your personal data to Dixcart offices in other countries and territories to fulfil our contracts. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they are contracted to provide. When they no longer need your data to fulfil this service, they will dispose of the details in line with Dixcart’s procedures.

Where Dixcart transfers data outside the EU or a country or territory which the EU or Guernsey law has determined as having equivalent data protection laws, Dixcart will enter into an agreement or put in place measures ensuring that your data will have equivalent protection as it has under the GDPR and Guernsey Data Protection Law. You are entitled to know the details of agreements or other safeguards for your data in place when your data is being transferred.

How long will Dixcart retain my data?

Dixcart will process your personal data for the duration of any business relationship with you. We will retain that data for a period of seven years following the cessation of the business relationship, unless required by any legal, contractual or other overriding obligation to maintain any data for any shorter or longer period.

Some data which may include data relating to employees may be retained for longer periods as may be required under law or to fulfil legal or other contractual obligations.

Your Rights as a Data Subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to find out if we have your personal information and obtain a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict how we use your information.
- Right of portability – you have the right to have the automatically-processed data we hold about you transferred to others in a machine-readable form.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated decision-making and profiling – you have the right not to be subject to automated decision-making and automated profiling.

These rights have limits under the Guernsey Data Protection Law and may not apply to all of your personal data in every circumstance.

Dixcart may require proof of identification of the person asserting their rights. Any requested proof of identity may include a certified copy of your current passport or other photographic identification document.

Complaints

If you have questions or complaints about how Dixcart processes your personal data, please contact the Dixcart Privacy Manager at Dixcart. You also have the right to lodge a complaint with the Guernsey Data Protection Authority.

The details for each of these contacts are:

Dixcart:
Contact: Privacy Manager
Address: Dixcart House, Sir William Place, St Peter Port, Guernsey, GY1 4EZ
Email: gdpr.guernsey@dixcart.com
Telephone: +44 (0)1481 738700

Guernsey Data Protection Authority:
Contact: Office of the Data Protection Commissioner
Address: Block A, Lefebvre Court, Lefebvre Street, St Peter Port, Guernsey, GY1 2JP
Email: info@odpa.gg
Telephone: +44 (0)1481 742074

You may have the right to appeal a response or decision of the Data Protection Authority in Guernsey courts, although you may only have a short period to do so.