

EFFECTIVE 1 OCTOBER 2022

# SG KLEINWORT HAMBROS PRIVACY NOTICE – TRUST AND FIDUCIARY SERVICES

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## 1. INTRODUCTION

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### (a) What this Privacy Notice covers

We gather, store and process personal data in accordance with Data Protection Legislation<sup>1</sup>. This Privacy Notice provides an overview of how we do this in the context of our trust and fiduciary services.

In this Privacy Notice “we” or “SG Kleinwort Hambros” refers (as applicable) to:

- SG Kleinwort Hambros Trust Company (UK) Limited;
- SG Hambros Trust Company Limited;
- SG Kleinwort Hambros Trust Company (CI) Limited; or
- KBTIOM Limited.

and such other companies in the SG Kleinwort Hambros Group who assist in providing trust and fiduciary services.

This Privacy Notice applies to all clients and prospective clients (as well as their respective authorised representatives) of SG Kleinwort Hambros and any person whose Personal Data we hold which has been provided to us in the course of providing our services (“you”). SG Kleinwort Hambros is part of Societe Generale Private Banking, the wealth management arm of the Societe Generale Group.

This Privacy Notice covers Personal Data that is held electronically and also applies to well-structured, paper-based filing systems.

### (b) Explanation of terms used in this Privacy Notice

**Managed Entity** means any company, foundation, partnership, estate, trust, association (whether incorporated or unincorporated) or other person or entity in respect of which we provide our services.

**Personal Data** means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

**Regulatory Authority** means any relevant government entity or other authority in any jurisdiction (or which may have authority across numerous jurisdictions) which is

<sup>1</sup> Data Protection Legislation refers to the following laws, as applicable to the relevant SG Kleinwort Hambros Group company: the General Data Protection Regulation 2016/679, the UK Data Protection Act 2018, the Data Protection (Jersey) Law 2018, the Data Protection (Bailiwick of Guernsey) Law 2017 and the Isle of Man Data Protection Act 2018 as amended, repealed or replaced from time to time.

## 1. INTRODUCTION CONTINUED

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responsible for authorising, supervising or otherwise regulating any part of the Societe Generale Group.

**Societe Generale Group** means Societe Generale S.A. and each direct and indirect subsidiary of that company.

**Special Category Personal Data** means information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

### (c) Examples of “Personal Data” and “Special Category Personal Data”

- **Personal Data:** Your name, address, telephone number, date of birth.
- **Special Category Personal Data:** Details of health conditions, political opinions, religious beliefs.

## 2. INFORMATION AND DATA SECURITY

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It is our policy to protect your right to privacy. We will take all reasonable steps to ensure that adequate technical and operational security measures, confidentiality obligations and compliance procedures are in place to prevent inappropriate access to, disclosure, alteration or deletion of, Personal Data. We operate information security policies and guidelines to better safeguard electronic data and information, which may include Personal Data.

In addition, we limit access to your Personal Data to those employees, agents and contractors who have a business need to know. Our agents and contractors will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### 3. TYPES OF PERSONAL DATA COLLECTED

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In the course of providing trust and fiduciary services to you, we may process Personal Data and Special Category Personal Data. This typically includes the following information relating to you:

#### **Information received from you**

- Personal contact details such as name, previous name, title, addresses, telephone numbers and personal email addresses.
- Date of birth and place of birth.
- Gender.
- Marital status, dependants (name and age) and relations.
- Your signature and copies of identification documents, such as passports and driving licences.
- National Insurance number, social security number or other national/tax identifier.
- Nationality, tax residence and country of residence.
- Employment details, income and source of wealth.
- Details of investments and assets owned and liabilities.
- Personal details of any agent or attorney.
- Billing information, such as credit or debit card details.
- Information and opinions expressed when participating in market research.

#### **Information received from third parties**

- Credit references and external intelligence reports.
- Publicly available information on business and personal associates and assets owned.
- Information from retiring trustees, such as the personal details listed above.
- Information from third party providers such as information that relates to your social interactions (including communications via social media).

#### **Information specific to our trust and fiduciary services**

We collect and store certain information generated by your use of our services, which includes:

- due diligence, sanctions and anti-money laundering checks;
- marketing and sales information (such as details of the services you receive and your preferences);
- content and metadata related to relevant exchanges of information, including emails and voicemail;
- accounts;
- reports and statements; and
- codewords.

### **3. TYPES OF PERSONAL DATA COLLECTED** CONTINUED

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#### **Special Category Personal Data**

- Details of any mental health conditions that mean you may not be able to make your own decisions due to loss of mental capacity.
- Details of whether you require communications in large type or by audio cassette.
- Political opinions or religious beliefs available from public sources of information, such as if you are on the board of a religious foundation.

#### **Other**

- Information about criminal convictions and offences, which would include publicly available information and suspicious activity reports.

### **4. HOW WE COLLECT YOUR PERSONAL DATA**

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We collect your Personal Data:

- when you seek, or are provided with, information on our services and/or products;
- when you apply for our services; and/or
- throughout your relationship with us.

### **5. SOURCES OF PERSONAL DATA**

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We collect your Personal Data:

- directly from you, e.g. in application forms and through information provided during the onboarding process, including background and reference checks;
- when it is provided to us by a third party, e.g. providers of enhanced due diligence reports and retiring trustees; and
- when information is created as a result of generally providing trust and fiduciary services to you.

## 6. HOW WE USE PERSONAL DATA

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We are a data controller which means that we are responsible for deciding how we hold and use Personal Data about you. We may use your Personal Data before, during and after our relationship with you.

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

1. where we need to perform the contract we have entered into with you;
2. where we need to comply with a legal obligation; and
3. where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your Personal Data in the following situations, which are likely to be rare:

1. where we need to protect your interests (or someone else's interests);
2. where it is needed in the public interest; and
3. where you have given your consent.

### **(a) Situations in which we will use your Personal Data**

We need all the categories of Personal Data described above primarily to allow us to:

- \* perform our contract with you;
- \*\* enable us to comply with legal obligations; and
- \*\*\* pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which we will process your Personal Data are listed below. We have indicated by asterisks from the above list the principal legal basis on which we are processing or will process your Personal Data, although please note that some of the grounds for processing will overlap and there may be several grounds which justify our use of your Personal Data. Where the legal basis of legitimate interests is applicable we explain what these are in square brackets.

## 6. HOW WE USE PERSONAL DATA CONTINUED

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- To confirm and verify your identity and, where applicable, conduct an appropriateness assessment. This may involve the use of other companies in the Societe Generale Group or third parties acting as our or their agents for screening against publicly available information (including law enforcement agency sanctions list(s)) or involve companies in the Societe Generale Group otherwise assessing your appropriateness. \*\*
- To establish and manage the relationship we (or any other companies in the Societe Generale Group) have with you or the Managed Entity and to provide our services. \*
- To monitor and analyse the conduct of your or the Managed Entity's accounts and relationship with us or with other companies in the Societe Generale Group to ensure compliance with our internal policies and/or procedures and to be able to monitor risks and report on them. \*\*
- To carry out business operational and administrative activities (including record keeping and audits) and to ensure security and business continuity. \*
- To carry out statistical and other analysis (including behavioural analysis). \*\*\* [In order to manage our business and provide the best services to you we need to understand and analyse their use by you.]
- To comply with any applicable laws and regulations and/or any voluntary code or industry best practice we reasonably decide to adopt. \*\*
- To comply with the request or requirement of any court, tribunal, mediator or arbitrator or any regulatory or governmental authority or taxation authority in any relevant jurisdiction. \*\*
- As is reasonably necessary to trace you (for example, if the contact details you have provided to us are no longer correct) or the Managed Entity, trace debtors and enforce or seek to obtain settlement of amounts owing to us (or to other companies in the Societe Generale Group). \*\*\* [We need to be able to recover monies that you owe to us which may require additional processing of your Personal Data if, for example, you have moved house without telling us.]
- To carry out the detection, investigation and prevention of fraud, tax evasion, money laundering, bribery, corruption, terrorist financing and other crime or malpractice and oversee and report on such detection, investigation and prevention activities over



## 6. HOW WE USE PERSONAL DATA CONTINUED

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such matters by us, other companies in the Societe Generale Group or other third parties. \*\*\* [In order to protect us and others from any crime or malpractice we need to be able to process your Personal Data. This may include conducting call backs to confirm instructions and automated and manual transaction monitoring to prevent fraud and identity theft].

- For use in connection with any legal proceedings or regulatory action (including prospective legal proceedings/regulatory action) and for obtaining legal advice or for establishing, exercising or defending legal rights. \*\*\* [In order to protect our position in relation to any legal proceedings or regulatory action we may need to analyse records including your Personal Data and share it with our professional advisors, third parties, the courts and regulators.]
- To give you information and marketing (by post, telephone, email or other medium using the contact details you have given us) about events, products and services offered by us (or by other companies in the Societe Generale Group) which we believe may be of interest to you. \*\*\* [It is in our interests to promote our services to you in order to grow our business. This is balanced against your interests and freedoms and we will always give you the option to stop receiving such communications.]
- To carry out market research and to identify trends. Market research agencies acting on our behalf may get in touch with you by post, telephone, email or other medium to invite you to take part in research. \*\*\* [We need to obtain client feedback in order to improve our services.]

### **(b) Special Category Personal Data**

Data processing may include the processing of Special Category Personal Data about you. Such Special Category Personal Data requires higher levels of protection. We need to have further justification for collecting, storing and using this type of Personal Data. We may process special categories of Personal Data in the following circumstances:

1. In limited circumstances, with your explicit written consent;
2. Where we need to carry out our legal obligations and in line with our data protection policy; and
3. Where it is needed in the public interest and in line with our data protection policy.

## 6. HOW WE USE PERSONAL DATA CONTINUED

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Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

The most common processing of Special Category Personal Data by us occurs where we record information from public sources about political opinions and religious beliefs that may be relevant to our assessment of your application or as part of our ongoing monitoring. For example, this might include information about you being on a board of a religious foundation or being a member of a political party.

### **(c) Information about criminal convictions**

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

The most common processing of information about criminal convictions and offences by us occurs when we share it for the purposes of the prevention or detection of crime and anti-fraud purposes, including the making of suspicious activity reports to the appropriate crime agency. We also collect publicly available information on criminal convictions and offences as part of our assessment of your application and ongoing monitoring.

### **(d) If you fail to provide Personal Data**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations (such as to complete our "know your client" checks).

### **(e) Change of purpose**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you in writing and update this Privacy Notice on our

## 6. HOW WE USE PERSONAL DATA CONTINUED

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website at: [www.kleinworthambros.com/en/important-information](http://www.kleinworthambros.com/en/important-information) and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 7. AUTOMATED DECISION-MAKING

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We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing and update this Privacy Notice on our website at: [www.kleinworthambros.com/en/important-information](http://www.kleinworthambros.com/en/important-information) if this position changes.

## 8. DISCLOSURE OF PERSONAL DATA BY US

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### (a) Recipients of Personal Data

We (and those parties to whom Personal Data is disclosed) may disclose Personal Data in the situations described above:

- to any other companies which are at the time of disclosure in the Societe Generale Group;
- to third parties who provide services to us or to other companies in the Societe Generale Group or that act as our (or such companies') agents (or prospective third party service providers or prospective agents). Such service providers and/or agents may also disclose such information to their service providers or agents. We, or the relevant member of the Societe Generale Group, will take all reasonable steps to ensure that the service provider or agent is subject to appropriate data processing requirements and that they impose such requirements on any of their service providers or agents;
- to third parties in connection with a potential or actual reorganisation (including investment), amalgamation, merger or transfer or sale of all or part of our business, including to any insurers and professional advisors, and any third parties to whom we assign, transfer or charge our interest in any service provided to you or the Managed Entity;

## 8. DISCLOSURE OF PERSONAL DATA BY US CONTINUED

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- to any court of any relevant jurisdiction or any relevant tribunal, mediator, arbitrator, ombudsman or taxation authority or any Regulatory Authority and any party appointed or requested by them to carry out investigations or audits of our activities;
- if we or any person to whom your information is disclosed have a right or duty to disclose it or are permitted (acting reasonably) or compelled by applicable laws and regulations;
- to debt collection agencies, law enforcement agencies and/or fraud prevention agencies;
- to our agents, auditors and professional advisors (and those agents, auditors and professional advisors of other companies in the Societe Generale Group) to enable them to process the information in the situations described above as a data processor on behalf of SG Kleinwort Hambros and/or as a data controller and to enable them to perform their obligations;
- to insurers and information providers; or
- otherwise if you consent to such disclosure.

### **(b) Marketing**

We will not sell or transfer your Personal Data to any third party for that party to use for direct marketing purposes without your prior consent.

## 9. OVERSEAS TRANSFERS

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Processing will include transferring Personal Data to (a) other SG Kleinwort Hambros companies; (b) other companies in the Societe Generale Group; and (c) third parties who provide services to us or any other company in the Societe Generale Group or act as our (or their) agents in any country. Such recipients are located in the United Kingdom, France, Gibraltar, Luxembourg and other countries in the European Economic Area (EEA). We may also transfer Personal Data to recipients in other countries outside of the EEA either on the basis of an adequacy decision by the European Commission (this is the case in respect of Jersey, Guernsey and Canada) or on the basis of a data transfer agreement using standard contractual clauses approved by the European Commission (this is the case in respect of India).

## **9. OVERSEAS TRANSFERS CONTINUED**

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Transfers outside of the EEA will include (but not be limited to) Personal Data including Special Category Personal Data which is essential for the provision of our services and products and the operation of our and/or the Societe Generale Group's business. If we transfer your information outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected in accordance with applicable laws and regulations and our policies and standards.

## **10. COOKIES**

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We use cookies and similar technologies to recognise you, remember your preferences and tailor the content we provide to you.

In relation to our website, please refer to our Website Privacy and Cookies Policy which is available at [www.kleinworthambros.com/en/important-information/website-privacy-and-cookies-policy/](http://www.kleinworthambros.com/en/important-information/website-privacy-and-cookies-policy/)

## **11. CONSENT**

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We will seek your consent where we wish to invite you to certain events organised by Societe Generale. You have the right to withdraw your consent at any time and can do so by contacting us.

## **12. MONITORING AND RECORDING COMMUNICATIONS**

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All telephone conversations with us may be monitored and/ or recorded without use of a warning tone or message with a view to improving our service to you and to protect both you and us and to help establish facts.

We may record and keep track of other communications between us including meetings, letters, emails, etc. We may use these recordings to check your instructions, assess, analyse and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes.

## **12. MONITORING AND RECORDING COMMUNICATIONS** CONTINUED

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We use closed circuit television (CCTV) in and around our offices and these may collect photos or videos of you.

All telephone recordings, CCTV and other records will remain our property and may be used to help resolve any disagreements between you and us, and to enable us to comply with our obligations under applicable laws and regulations.

## **13. RETENTION OF PERSONAL DATA**

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We will retain Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory, accounting, reporting or internal policy requirements.

### **(a) Client records**

The length of time for which we hold your Personal Data will vary as determined by the following criteria:

- the purpose for which we are using it (as further described in this Privacy Notice in section 6) – we will need to keep the data for as long as is necessary for that purpose; and
- our legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

### **(b) Records of prospective clients**

We will retain records of prospective clients who do not become clients for 5 years from the date of the record, save in the case of a complaint where the records shall be kept for 10 years from the date of resolution of the complaint.

Further information on the retention periods of Personal Data can be requested from the Data Protection Officer whose details are below.

## 14. YOUR RIGHTS AND DUTIES

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### (a) Your duty to inform us of changes and inform others

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us. If you provide information for another person (for example an instigator, controller, beneficial owner or settlor of a Managed Entity), you will need to direct them to this Privacy Notice.

### (b) Your rights in connection with Personal Data

Under certain circumstances, by law you have the right to:

- request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it;
- request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below);
- object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes by writing to us or using any opt-out facility specified by us in the relevant marketing communication;
- request the restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it; and
- request the transfer of your Personal Data to another party (also known as “data portability”).

## 14. YOUR RIGHTS AND DUTIES CONTINUED

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If you want to request the correction, erasure or restriction of the processing of your Personal Data, object to the processing of your Personal Data, or request that we transfer a copy of your Personal Data to another party, please write to your usual contact or the Data Protection Officer at the address below. The exercise of some of these rights may result in SG Kleinwort Hambros no longer being able to provide a service to you. If you want to access your Personal Data, please contact our Data Protection Officer by email to [Data-Protection@kleinworthambros.com](mailto:Data-Protection@kleinworthambros.com) or by writing to:

### **Data Protection Officer**

SG Kleinwort Hambros Trust Company  
(UK) Limited  
One Bank Street  
Canary Wharf  
London E14 4SG  
United Kingdom

### **Data Protection Office**

SG Kleinwort Hambros Trust Company  
(CI) Limited  
PO Box 197  
SG Hambros House  
18 Esplanade  
St Helier  
Jersey JE4 8RT

### **Data Protection Officer**

SG Hambros Trust Company Limited  
One Bank Street  
Canary Wharf  
London E14 4SG  
United Kingdom

### **Data Protection Officer**

SG Kleinwort Hambros Trust Company  
(CI) Limited  
PO Box 86  
Hambro House  
St Julian's Avenue  
St Peter Port  
Guernsey GY1 3ED

### **Data Protection Officer**

KBTIOM Limited  
First Names House  
Victoria Road  
Douglas IM2 4DF  
Isle of Man



## 14. YOUR RIGHTS AND DUTIES CONTINUED

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You have the right to make a complaint at any time by writing to the relevant supervisory authority:

### **United Kingdom**

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF  
United Kingdom

### **Guernsey**

Office of the Data Protection Commissioner  
Guernsey Information Centre  
North Esplanade  
St Peter Port  
Guernsey GY1 2LQ

### **Jersey**

Office of the Information Commissioner  
Brunel House  
Old Street  
St Helier  
Jersey JE2 3RG

### **Isle of Man**

Isle of Man Information Commissioner  
PO Box 69  
Douglas IM99 1EQ  
Isle of Man

### **(c) No fee usually required**

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **(d) What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

### **(e) Queries relating to other SG Kleinwort Hambros/Societe Generale Group Entities**

If you have a query regarding the processing of your Personal Data by any other SG Kleinwort Hambros or Societe Generale Group company please contact us, explaining which company your query relates to and that your query relates to data protection.

## **15. CHANGES TO THIS PRIVACY NOTICE**

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We reserve the right to update this Privacy Notice at any time, and we will notify you either in writing or by updating this Privacy Notice on our website at: [www.kleinworthambros.com/en/important-information](http://www.kleinworthambros.com/en/important-information) when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your Personal Data.

## IMPORTANT INFORMATION

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SG Kleinwort Hambros Trust Company (UK) Limited is an Appointed Representative of SG Kleinwort Hambros Bank Limited. SG Kleinwort Hambros Bank Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. SG Kleinwort Hambros Trust Company (UK) Limited is incorporated in England and Wales under number 514879 and its registered address is One Bank Street, Canary Wharf, London E14 4SG. Telephone calls may be monitored or recorded.

SG Hambros Trust Company Limited is authorised and regulated by the Financial Conduct Authority. The firm reference number is 122566. The company is incorporated in England and Wales under number 328136 and its registered office is One Bank Street, Canary Wharf, London E14 4SG.

SG Kleinwort Hambros Trust Company (CI) Limited is 100% owned by SG Kleinwort Hambros Bank Limited, which authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. The company is incorporated in England and Wales under number 964058 and its registered address is One Bank Street, Canary Wharf, London E14 4SG.

SG Kleinwort Hambros Trust Company (CI) Limited is regulated by the Jersey Financial Services Commission (“JFSC”) and by the Guernsey Financial Services Commission (“GFSC”). The company is incorporated in Jersey under number 4345 and its registered address is SG Hambros House, 18 Esplanade, St Helier, Jersey JE4 8RT. Its address in Guernsey is PO Box 86, Hambro House, St Julian’s Avenue, St Peter Port, Guernsey GY1 3ED. This document has not been authorised or reviewed by the JFSC or GFSC.

KBTIOM Limited is incorporated in the Isle of Man with company number 012314V. Its registered address is First Names House, Victoria Road, Douglas IM2 4DF, Isle of Man.

**SG Kleinwort Hambros Trust Company (UK) Limited**

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18 Esplanade, St Helier  
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F +44 1534 815640

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St Julian's Avenue, St Peter Port  
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[www.kleinworthambros.com](http://www.kleinworthambros.com)

