

EFFECTIVE 1 OCTOBER 2022

# SG KLEINWORT HAMBROS PRIVACY NOTICE – BANKING AND INVESTMENT 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 banking and investment services.

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

- SG Kleinwort Hambros Bank Limited;
- SG Kleinwort Hambros Bank Limited, Jersey Branch;
- SG Kleinwort Hambros Bank Limited, Guernsey Branch;
- SG Kleinwort Hambros Bank Limited, Gibraltar Branch;
- SG Kleinwort Hambros Private Investment Office Services Limited; or
- KBBIOM Limited.

This Privacy Notice applies to all clients and prospective clients (as well as their respective authorised representatives) of SG Kleinwort Hambros (“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.

We may reorganise the structure of our business from time to time. Accordingly, any consents you provide to the SG Kleinwort Hambros branch which is your data controller, are consents to other SG Kleinwort Hambros branches which may become the data controller in the future as a result of any such reorganisation.

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

**App** has the meaning given in Part 4 of the Banking and Investment Terms of Business.

**Device** has the meaning given in Part 4 of the Banking and Investment Terms of Business.

**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).

<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, the Gibraltar Data Protection Act 2004, the Irish Data Protection Act 2018 and the Isle of Man Data Protection Act 2018 as amended, repealed or replaced from time to time.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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**Regulatory Authority** means any relevant government entity or other authority in any jurisdiction (or which may have authority across numerous jurisdictions) which is 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, account number.
- **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 banking and investment 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.
- 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 financial intermediaries, 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 banking and investment 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;
- risk rating information such as credit risk rating and transactional behaviour;
- account numbers;

### 3. TYPES OF PERSONAL DATA COLLECTED CONTINUED

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- balances;
- investment holdings;
- transaction data and any suspicious or unusual activity;
- reports and statements; and
- codewords.

#### **Information specific to KH Online**

When you use KH Online (eBanking Service) we may automatically collect and store certain information in server logs which we use for internal reporting and audit purposes. This includes:

- usernames and passwords;
- internet protocol (IP) addresses;
- internet service provider (ISP);
- clickstream data;
- browser type and language; and
- viewed and exit pages and date or time stamps.

#### **Information specific to the KH Online Mobile Application**

When you use the mobile application we collect the following information:

- Submitted information: information that you provide by filling in forms, either electronically or manually by hand. This includes information provided at the time of registering to use the mobile application. We may ask for further information if you report a problem;
- Additional information: if you contact us, we may keep a record of that correspondence;
- Device information: we may collect information about the device or any computer you may use to download or stream a copy of the app onto your device, including, where available, the device's unique device identifiers, operating system, browser type and mobile network information as well as the device's telephone number for system administration. We may associate device information with submitted information and will treat the combined information as Personal Data for as long as it is combined; and

### 3. TYPES OF PERSONAL DATA COLLECTED CONTINUED

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- Location information: When you access the mobile application installed on your Device, we will collect and process information about your actual location. We use such Personal Data for security purposes. You will be asked to consent to your Personal Data being used for this purpose, when you launch the App. If you do not wish your Personal Data to be used for such purposes, you may decline consent, which will mean the App will not launch and, as a result, you will not be able to use the mobile application.

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

- Details of any mental health conditions that mean you may not be able to make your own decisions due to the 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, including when using KH Online on computers, mobiles or tablets.

## **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. financial advisors, brokers, intermediaries, credit reference agencies, fraud prevention agencies, providers of enhanced due diligence reports and financial intermediaries; and
- when information is created as a result of generally providing the banking and investment services to you, including through the use by you of KH Online on computers, mobiles and tablets.

## **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.



## 6. HOW WE USE PERSONAL DATA CONTINUED

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### (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.

- To confirm and verify your identity and credit status in relation to your application or account 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 credit risk and making credit risk decisions. \*\*
- To open, administer and operate your account (with us or at other companies in the Societe Generale Group) and manage our relationship with you and to provide products or services to you (including carrying out or facilitating any transactions). \*
- To monitor and analyse the conduct of your accounts and relationship with us or with other companies in the Societe Generale Group to ensure compliance with our internal policies and/or procedures or the Societe Generale Group's 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 assess any credit limit or other credit decision (as well as the interest rate, fees and other charges to be applied to your account). \*\*
- To carry out statistical and other analysis (including behavioural analysis). \*\*\* [In order

## 6. HOW WE USE PERSONAL DATA CONTINUED

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to manage our business and provide the best services and products 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 of any relevant jurisdiction or any relevant tribunal, mediator, arbitrator, ombudsman, taxation authority or regulatory or governmental authority. \*\*
- As is reasonably necessary to trace you (for example, if the contact details you have provided to us are no longer correct), trace debtors and enforce or seek to obtain settlement of amounts owing to us due to a default under your account(s) (with us or with 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 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

## 6. HOW WE USE PERSONAL DATA CONTINUED

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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 products and 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.

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:

- you suffer from a mental health condition that means that you are no longer able to make your own decisions due to the loss of mental capacity. In such cases we will amend our procedures in order to take instructions from your duly appointed attorney or deputy;
- you ask us to send communications in large type or by audio cassette in which case we will keep a record of such request for future communications; and

## 6. HOW WE USE PERSONAL DATA CONTINUED

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- 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 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 financial product or service provided to you;
- 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 (for example, financial institutions and payments or messaging service providers may from time to time be required to provide certain transaction information to authorities or other official bodies, whether located in the European Union or overseas, to assist in the

## **8. DISCLOSURE OF PERSONAL DATA BY US** CONTINUED

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prevention of terrorism, money laundering, tax evasion, and other crimes) or if we or any person to whom your information is disclosed wishes (acting reasonably) to share the information with other financial institutions to assist in the prevention of terrorism, money laundering, tax evasion, and other crimes;

- to debt collection agencies, credit reference agencies, law enforcement agencies, fraud prevention agencies, trade associations and payment service providers;
- to financial organisations such as SWIFT where required for the transfer of funds and operation of your account;
- to other parties involved in any disputes, including disputed transactions;
- to intermediaries, correspondent and agent banks, clearing houses, clearing or settlement systems, market counterparties, brokers and any companies you hold securities in through us;
- to people you make payments to and receive payments from;
- to other financial institutions, lenders and holders of security over any property you charge to us;
- to any third party service provider which you use for the provision of account information or payment initiation services to you;
- to guarantors (where your account is backed by a guarantee), solicitors, surveyors, valuers, other lenders, conveyancers and third party intermediaries;
- to joint account holders, trustees, beneficiaries, administrators or executors;
- 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;

## 8. DISCLOSURE OF PERSONAL DATA BY US CONTINUED

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- to our card processing supplier(s) to carry out credit, fraud and risk checks, process your payments, issue and manage your card;
- to any fund managers who provide asset management services to you and any brokers who introduce you to us or deal with us for you;
- to anyone who provides instructions on or operates any of your accounts, products or services on your behalf (eg. under a power of attorney, solicitors, intermediaries, etc.); or
- if you consent to such disclosure.

### **(b) Credit Reference and Fraud Prevention Agencies**

We may disclose information we hold about you to licensed credit reference agencies, or other similar organisations that help us and others make credit decisions and reduce the incidence of fraud and money laundering, or in the course of carrying out identity, fraud prevention or credit control checks. We may therefore search our records and those of credit reference and fraud protection agencies to assess any application. These agencies give us both public information (including information from the Electoral Register) and shared credit and fraud prevention information to verify your identity.

It is also important that you give us accurate information. We will check your details with credit reference and fraud prevention agencies and if you give us false or inaccurate information and we suspect fraud, we will record this and pass this to credit reference and fraud prevention agencies and other organisations involved in crime and fraud prevention.

If you make a joint application, or tell us that you have a spouse or financial associate, we will link your records together. You should discuss this with them, and share this information with them before submitting the application. Credit reference and fraud prevention agencies may also link your records together.

We and other organisations may access and use from other countries the information recorded by credit reference and fraud prevention agencies. The credit reference agencies and fraud prevention agencies will also use the records for statistical analysis about credit and about insurance and fraud. We and they may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

## **8. DISCLOSURE OF PERSONAL DATA BY US** CONTINUED

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### **(c) Transaction reporting**

We are obliged under applicable laws and regulations to retain certain data relating to orders and other reportable transactions in financial instruments which we have carried out on your behalf and report them daily to the relevant regulatory authority. Such reporting is conducted through intermediaries who provide us with transaction reporting services. This means that some of your Personal Data such as your national insurance number (or social security number or other national identifier) or your name and date of birth, together with information relating to the order or transaction will be disclosed to the relevant regulatory authority and our intermediaries.

### **(d) Payment cards**

We may (but are not obliged to) disclose information about you and your account to third parties (such as the police) in order to facilitate the recovery of a lost, stolen or misappropriated payment card and to minimise loss to you and us.

We may disclose information about you and your account to third parties in the case of a mistaken payment. If we are told, for example by another bank, that money has been paid into an account you hold with us by mistake and if we are unable to return funds to that person, we can give them details about you and your account so that they can recover the money from you.

We may pass on Personal Data in your application to the VISA payment system and to others, for the purposes of verifying payments made and where necessary to facilitate the operation of your account.

### **(e) 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, Ireland, 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, Canada and Switzerland) 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).

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 Cookies Policy which is available at [www.kleinworthambros.com/en/important-information/website-cookies-policy/](http://www.kleinworthambros.com/en/important-information/website-cookies-policy/)

In relation to KH Online, please refer to our Cookies Policy for KH Online which is available at [www.kleinworthambros.com/en/important-information/cookies-policy-for-the-private-ebanking-service/](http://www.kleinworthambros.com/en/important-information/cookies-policy-for-the-private-ebanking-service/)

## **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 your Private Banker.

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

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All telephone conversations with us (and any service desk established in connection with KH Online) 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.

In particular, we will record all telephone conversations and communications (as well as other communications regardless of their form, e.g. letters, faxes, face-to-face conversations) that take place between us and you which involve investment services or activities and that result or may result in the provision by us of client order services relating to the reception, transmission or execution of your orders. We shall also record information relating to our face-to-face conversations with you where relevant to client order services.

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 overleaf.

## 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, a joint account holder or a dependant), 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 your Private Banker 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 contact your Private Banker 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 product or 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 Bank Limited  
One Bank Street  
Canary Wharf  
London E14 4SG

### **Data Protection Officer**

SG Kleinwort Hambros Bank Limited  
Jersey Branch  
PO Box 78, 38 Esplanade  
St Helier  
Jersey JE4 8PR

### **Data Protection Officer**

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

### **Data Protection Officer**

SG Kleinwort Hambros Bank Limited  
Guernsey Branch  
PO Box 6  
Hambro House  
St Julian's Avenue  
St Peter Port  
Guernsey GY1 3AE

### **Data Protection Officer**

SG Kleinwort Hambros Bank Limited  
Gibraltar Branch  
Unit 5.02, Madison  
Midtown, Queensway  
Gibraltar GX11 1AA

### **Data Protection Officer**

SG Kleinwort Hambros Private Investment Office  
Services Limited  
Alexandra House  
The Sweepstakes  
Ballsbridge  
Dublin 4  
D04 C7H2  
Ireland

## 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  
UK

### **Jersey**

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

### **Guernsey**

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

### **Gibraltar**

Gibraltar Regulation Authority  
2nd Floor  
Eurotowers 4  
1 Europort Road  
Gibraltar

### **Ireland**

Data Protection Commission  
Canal House  
Station Road  
Portarlinton  
R32 AP23 Co. Laois  
Ireland

### **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.

## **14.YOUR RIGHTS AND DUTIES** CONTINUED

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### **(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 your Private Banker, 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 Bank Limited is authorised by the Prudential Regulation Authority regulated by the Financial Conduct Authority and the Prudential Regulation Authority. The company is incorporated in England and Wales under number 964058 with registered office at One Bank Street, Canary Wharf, London E14 4SG.

SG Kleinwort Hambros Bank Limited, Jersey Branch is regulated by the Jersey Financial Services Commission. SG Kleinwort Hambros Bank Limited is also authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority in the UK. The bank's principal address in Jersey is PO Box 78, 38 Esplanade, St Helier, Jersey JE4 8PR. The company is incorporated in England and Wales under number 964058 with registered office at One Bank Street, Canary Wharf, London E14 4SG. Services provided by SG Kleinwort Hambros Bank Limited, Jersey Branch will be subject to the regulatory regime applicable in Jersey, which differs in some or all respects from that of the UK. For UK-resident clients certain FCA protections may apply in addition to those available under the Jersey regime in certain specific circumstances.

SG Kleinwort Hambros Bank Limited, Gibraltar Branch is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority and is authorised and regulated by the Gibraltar Financial Services Commission in respect of banking, investment and insurance mediation business. The company is incorporated in England and Wales under number 964058 with registered office at One Bank Street, Canary Wharf, London E14 4SG and is registered in Gibraltar under the Gibraltar Companies Act with its principal place of business in Gibraltar at Unit 5.02, Madison, Midtown, Queensway, Gibraltar GX11 1AA. The liability of the members of SG Kleinwort Hambros Bank Limited is limited. Services provided by SG Kleinwort Hambros Bank Limited, Gibraltar Branch will be subject to the regulatory regime applicable in Gibraltar, which differs in some or all respects from that of the UK. For UK-resident clients certain FCA protections may apply in addition to those available under the Gibraltar regime in certain specific circumstances.

SG Kleinwort Hambros Private Investment Office Services Limited is incorporated in the Republic of Ireland with company number 504172. Its registered address is Alexandra House, The Sweepstakes, Ballsbridge, Dublin 4, D04 C7H2, Ireland. Directors: David Brennan, Martin Wilson (British), Martin Ekins (British).

KBBIOM Limited is incorporated in the Isle of Man with company number 012130V. Its registered address is First Names House, Victoria Road, Douglas IM2 4DF, Isle of Man.



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London E14 4SG  
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PO Box 78, 38 Esplanade, St Helier  
Jersey JE4 8PR  
T +44 1534 815555  
F +44 1534 815640

**SG Kleinwort Hambros Bank Limited  
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PO Box 6, Hambro House  
St Julian's Avenue, St Peter Port  
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T +44 1481 726521  
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Gibraltar Branch**

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Gibraltar GX11 1AA  
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**SG Kleinwort Hambros Private Investment Office  
Services Limited**

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Victoria Road  
Douglas IM2 4DF  
Isle of Man