

Effective 25 May 2018

## **Kleinwort Hambros**

Privacy Notice – Banking and Investment Services



BUILDING TEAM SPIRIT  
**TOGETHER**

SOCIETE GENERALE GROUP

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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 “Kleinwort Hambros” refers (as applicable) to:

- SG Kleinwort Hambros Bank Limited;
- SG Kleinwort Hambros Bank (CI) Limited;
- SG Kleinwort Hambros Bank (CI) Limited – Guernsey Branch;
- SG Kleinwort Hambros Bank (Gibraltar) Limited; or
- SG Kleinwort Hambros Private Investment Office Services Limited.

This Privacy Notice applies to all clients and prospective clients of Kleinwort Hambros (“you”).

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

**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).

**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.

<sup>1</sup> Data Protection Legislation refers to the following laws, as applicable to the relevant 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of Guernsey) Law 2017, the Gibraltar Data Protection Act 2004 and the Irish Data Protection Act 2018, as amended, repealed or replaced from time to time.

## 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, title, addresses, telephone numbers and personal email addresses.
- Date of birth and place of birth.
- Gender.
- Marital status, dependants (name and age) and relations.
- 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.

### 3. Types of Personal Data collected continued

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

- Credit references.
- Publicly available information on business and personal associates and assets owned.
- Information from financial intermediaries, such as the personal details listed above.

#### **Information specific to our banking and investment services**

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

- account numbers;
- balances;
- investment holdings;
- transaction data;
- reports and statements; and
- codewords.

#### **Information specific to the Private eBanking Service**

When you use the Private 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 App Service**

When you use the App Service which is part of our online banking platform 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 App Service. 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;

### 3. Types of Personal Data collected continued

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- 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
- Location information: when you use one of our location-enabled App Services, we may collect and process information about your actual location. Some of these App Services require your Personal Data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time via the app's preferences.

#### **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 our Private eBanking Service 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. credit reference 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 the Private eBanking Service 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. \*
- 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 to manage our business and provide the best services and products to you we need to understand and analyse their use by you.]



## 6. How we use Personal Data continued

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- 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 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.]

## 6. How we use Personal Data continued

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### **(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
- 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.

## 6. How we use Personal Data continued

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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 that act as our 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 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, taxation authority or regulatory or governmental authority;
- 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 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, law enforcement agencies and/or fraud prevention agencies;
- to financial organisations such as SWIFT where required for the transfer of funds and operation of your account;

## 8. Disclosure of Personal Data by us continued

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- to any third party service provider which you use for the provision of account information or payment initiation services to you;
- to any guarantor, where your account is backed by a guarantee;
- to our agents, auditors, service providers, and professional advisors (and those agents, auditors, service providers 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 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) Credit Reference 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, 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.

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.

### **(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

## **8. Disclosure of Personal Data by us** continued

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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 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

## 9. Overseas transfers continued

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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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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/)

In relation to our Private eBanking Service, please refer to our Cookies Policy for Private eBanking Service at [www.kleinworthambros.com/en/ebanking/help/cookies-policy/](http://www.kleinworthambros.com/en/ebanking/help/cookies-policy/)

## 11. Consent

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We will seek your consent where we wish to invite you to cultural or sporting events or 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 the Private eBanking Service) 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.

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.

All telephone recordings 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. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### (a) Client records

The majority of client records are kept for 7 years in the UK and Ireland and 10 years in Jersey, Guernsey and Gibraltar from the date of closure of the relationship. Certain records are kept for the same retention periods, but these run from the date of the record instead. Records in relation to pension transfers or pension opt-outs are kept indefinitely.



### 13. Retention of Personal Data continued

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#### **(b) Communication records**

We will retain the recordings of telephone conversations as well as records of such electronic and other communications for a period of 5 years. A copy of those recordings or records will be available to the relevant regulatory authority and to you on request during the retention period.

#### **(c) 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**

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.

#### **(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);

## 14. Your rights and duties continued

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- 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”).

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 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 writing to:

### **Data Protection Officer**

SG Kleinwort Hambros Bank Limited  
8 St James's Square  
London  
SW1Y 4JU  
UK

### **Data Protection Officer**

SG Kleinwort Hambros Bank (CI) Limited  
PO Box 78  
18 Esplanade  
St Helier  
Jersey  
JE4 8PR

### **Data Protection Officer**

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

### **Data Protection Officer**

SG Kleinwort Hambros Bank  
(Gibraltar) Limited  
PO Box 375  
Hambros House  
32 Line Wall Road  
Gibraltar

## 14. Your rights and duties continued

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### **Data Protection Officer**

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

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

## **14. Your rights and duties** continued

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### **(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 Kleinwort Hambros/Societe Generale Group Entities**

If you have a query regarding the processing of your Personal Data by any other 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 and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. The firm reference number is 119250. The company is incorporated in England and Wales under number 964058 and its registered address is 5th Floor, 8 St James's Square, London SW1Y 4JU.

SG Kleinwort Hambros Bank (CI) Limited is regulated by the Jersey Financial Services Commission ("JFSC") for banking, investment, money services and fund services business. The company is incorporated in Jersey under number 2693 and its registered address is PO Box 78, SG Hambros House, 18 Esplanade, St Helier, Jersey JE4 8PR. SG Kleinwort Hambros Bank (CI) Limited – Guernsey Branch is also regulated by the Guernsey Financial Services Commission ("GFSC") for banking, investment and money services business. Its address is PO Box 6, Hambro House, St Julian's Avenue, St Peter Port, Guernsey, GY1 3AE. The company (including the branch) is also authorised and regulated by the UK Financial Conduct Authority ("FCA") in respect of UK regulated mortgage business. The firm reference number is 310344. This document has not been authorised or reviewed by the JFSC, GFSC or FCA.

SG Kleinwort Hambros Bank (Gibraltar) Limited is authorised and regulated by the Gibraltar Financial Services Commission for the conduct of banking, investment and insurance mediation business. The company is incorporated in Gibraltar under number 01294 and its registered address is 32 Line Wall Road, Gibraltar.

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).





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