

## ***Compliance with General Data Protection Regulation (GDPR)***

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## 1. Personal Data and how it shall be used by EPW Europe Private Wealth Ltd

Personal Data that is collected by EPW in the course of the provision of its services, is processed according to the General Data Protection Regulation (EU) 2016/679 (the “GDPR”).

Such Data that might be collected by EPW through electronic communication means and in hard copies may include: -

- Contact details (names, postal addresses, email addresses and telephone numbers);
- Information required for EPW to meet legal and regulatory requirements, in relation to the Anti-Money Laundering legislation, including information on source of funds and source of wealth;
- Information provided in the course of the provision of legal and governance services (for example, information on professional relationships and background, financial wealth and assets held, transactions entered, tax status, disputes and court proceedings engaged in);
- Other Financial information and Professional interests/developments;
- Any other information that may be given in the course of the provision of services.

Personal Data is never disclosed or shared without the written consent of the client or unless required to do so by law. EPW retains the data for a certain period and as long as it is considered necessary, for the purposes specified in each engagement agreement. The purpose for processing personal data is:

- (a) to provide the services agreed in a particular Service Agreement and to perform any other obligations in relation to a Service Agreement;
- (b) to comply with Legal or Regulatory obligations.

## 2. Clients’ Rights

If a client believes that EPW holds any incomplete or inaccurate data, the client has the right to ask EPW to correct and/or complete the information. A client also has the right to request erasure of his personal data or to restrict processing (where applicable) in accordance with the data protection laws.

### 3. Sharing and Disclosing Your Personal Information

If EPW cooperates with third-parties in providing its services, it ensures that all processors acting on its behalf only process client data in accordance with instructions from EPW and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

#### 4. Potential recipients of data may be:

- Other providers of services (legal, administrative or otherwise, including any bank or financial institution providing services in relation to any matter on which EPW is instructed) where disclosure to that provider of services is considered necessary;
- Any sub-contractors, agents or service providers to EPW;
- Regulators or other governmental or supervisory bodies with a legal right to the data or a legitimate interest in any data;
- Any registrar of a public register where the data is to be included;

Only data for which EPW has obtained the clients' consent to the transfer is included.

In the case where any such third party is outside the European Union and the data being transferred includes personal data which would be protected under applicable Data Protection regulation, EPW will ensure it meets the relevant requirements of that Data Protection regulation prior to carrying out any such transfer.

#### 5. Safeguarding Measures

EPW shall take all necessary measures in order to protect the security of all personal information. It shall protect all data from loss, misuse, unauthorized access or disclosure, alteration, or destruction. EPW shall not be liable for unlawful or unauthorized use of any personal information due to misuse or misplacement of the passwords, negligent or malicious use.

The Company maintains policies and procedures and has measures in place in order to ensure high levels of protection of personal data which include appropriate restrictions on permissions of access to personal information and controls and monitoring of storing and distribution of data. All employees and providers of the Company are required to follow certain privacy and security policies and procedures.

## 6. How Long Data is kept

EPW retains the personal information that is collected from clients only for as long as required for statutory, business, tax or legitimate interest purposes. Your information is retained in electronic or paper format or both. When it is no longer required, it will be deleted or safely destroyed.