

PRIVACY NOTICE



At Utmost Services Limited, Utmost Administration Limited, Utmost International Isle of Man Limited, Utmost Trustee Solutions Limited and Utmost International Trust Company Limited (Utmost International) we are committed to protecting your privacy and ensuring that your personal information is collected and used appropriately, lawfully, and transparently.

This **Privacy Notice** explains:

- › who we are
- › what personal information we collect
- › how we use your personal information
- › who we share your information with and why
- › how we keep your information secure
- › your rights
- › how to contact us.

WHO WE ARE

Utmost Services Limited, Utmost Administration Limited, Utmost International Isle of Man Limited, Utmost Trustee Solutions Limited and Utmost International Trust Company Limited (Utmost International) provides wealth management products and services through a network of companies and businesses based around the world.

WHAT PERSONAL INFORMATION WE COLLECT

We collect certain personal information about you, this includes your name, address, or phone number and other information. We collect this information about you when you:

- › use our website and secure online services
- › contact us about products and/or services
- › apply for and receive services
- › visit a financial adviser
- › register to receive one of our newsletters.

The type of personal information we collect will depend on the purpose for which it is collected and will include:

- › your contact details
- › information to verify your identity
- › family, lifestyle and health information
- › financial and bank details
- › employment information.

We collect personal information directly from you. For example, we ask for personal information at the start of our relationship (e.g.: when you apply for a policy or service) and in subsequent communications in order to check your identity. This is a legal requirement and is important to help safeguard you and us against potential crime.

Where we provide our services to trusts we collect the personal information listed for the settlor, protector beneficiaries and trustees of that trust. Where we provide our services to companies we may collect personal information for Directors, Shareholders and Beneficial Owners of the company.

Where it is necessary we collect more sensitive information (such as criminal convictions or detailed health information). If this is the case we will explain what information we require and why it is needed.

We may also collect information about you from other sources such as:

- › your adviser
- › another agent (if you have one)
- › external third parties (eg: to verify your identity)
- › from Cookies (Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the website owners. To learn more about information collected through cookies, please click here: www.utmostinternational.com/cookie-policy.)

We keep your personal information only as long as is necessary for the purpose for which it was collected, or for legal or regulatory reasons. Personal information will be securely disposed of when it is no longer required in accordance with our **Personal Data Retention and Disposal Schedule**.

HOW WE USE YOUR PERSONAL INFORMATION

We process your personal information for the following purposes.

To perform our contract with you and to support and maintain that relationship. This includes the following:

- › assessing and processing an application for our services
- › providing our products and/or services to you, including the management of our relationship with you and your adviser, or any other agent (if you have one)
- › carrying out transactions you have requested
- › monitoring or recording telephone calls with you to resolve any queries or issues or for audit or training purposes
- › record keeping to ensure our products and/or services operate within the law and relevant regulatory requirements
- › providing other services (eg: enhanced due diligence, underwriting, reinsurance, data hosting, online services, and payments or reporting of any tax or levy).

To comply with legal and regulatory requirements. These requirements include the following:

- › confirming your identity for regulatory purposes
- › detecting and preventing fraud, money laundering, terrorist financing, bribery or other malpractice
- › to meet tax reporting obligations such as Common Reporting Standards (CRS) and the US Foreign Account Tax Compliance Act (FATCA).

For specific business purposes to enable us to provide you with appropriate products and services and a secure experience. Our business purposes include the following:

- › verifying your identity for security purposes
- › enhancing, modifying and personalising our services for your benefit
- › providing communications which we think will be of relevance to you
- › customer satisfaction research or statistical analysis
- › audit and record keeping purposes
- › enhancing the security of our network and information systems
- › maintaining effective management systems including internal reporting to our parent company and other members of our corporate group.

You have the right to object to us processing your personal data for the business purposes listed above however this may have consequences in relation to Utmost International being able to continue servicing your policy.

WHO WE SHARE YOUR INFORMATION WITH AND WHY

We share your information with trusted third parties, who perform tasks for us and help us to provide our products and/or services to you or to meet regulatory requirements such as tax reporting. These include:

- › other companies within the Utmost Group of companies, your financial adviser, third party data providers used by your adviser and any other party authorised by you
- › third parties who perform tasks for us to help us provide our services to you or to allow us to accurately report to relevant tax authorities (these third parties may be based in countries outside the EEA)
- › a third party to verify your identity, in line with anti-money laundering or other requirements

- › organisations, including the police and fraud prevention agencies, to prevent and detect fraud
- › regulatory or governmental agencies such as the IOM Financial Services Authority
- › an appointed discretionary asset manager or custodian to meet their legal or regulatory requirements
- › a prospective buyer (or its advisors), for due diligence purposes, if we are considering a sale of any of our business or assets
- › other agencies where required by law, court order or regulation.

HOW WE KEEP YOUR INFORMATION SECURE

We are committed to ensuring the confidentiality of the personal information that we hold and we continue to review our security controls and related policies and procedures to ensure that your personal information remains secure.

When we contract with third parties, we require that they have appropriate security, privacy and confidentiality measures in place to ensure that personal information is kept secure.

If we work with third parties in countries outside the EEA we ensure these are countries that the European Commission has confirmed have an adequate level of protection for personal information, or the third party receiving the personal data has provided adequate safeguards and agrees to treat your information with the same level of protection as we would.

YOUR RIGHTS

You have the right to ask us:

- › for a copy of the personal information we hold about you
- › to update or correct your personal information
- › to delete your information
- › to restrict processing of your personal information where appropriate.

In certain circumstances you also have the right to:

- › object to the processing of your personal information
- › object to automated decision making and profiling
- › data portability.

Information about your individual rights, including how to correct, restrict, delete, or make changes to your personal information, can be found on our website here:

<https://utmostinternational.com/privacy-statements/>

If you wish to request a copy of the personal information we hold about you please contact the Data Protection Officer as detailed below.

More information about your data protection rights can be found here:

<https://www.inforights.im/>

As the Isle of Man is not part of the United Kingdom, our Appointed Representative in the United Kingdom is an establishment of Utmost Services Limited based at Saddlers House, 5th Floor, 44 Gutter Lane, London, EC2V 6BR.

Our Appointed Representative in the European Union is an establishment of Utmost Services Ireland Limited based at Ashford House, Tara Street, Dublin 2, DO2 VX67, Ireland.

HOW TO CONTACT US

If you have questions about this notice or need further information about our privacy practices or to make a complaint please contact the Data Protection Officer.

Write to: Data Protection Officer,
Utmost International,
King Edward Bay House,
King Edward Road,
Onchan,
Isle of Man,
IM99 1NU,
British Isles

Email: IOM.DPO@utmostinternational.com

Telephone: + 44 (0) 1624 655555

If you are not satisfied with our response you can complain to our supervisory authority:

Write to: The Isle of Man Information Commissioner,
First Floor,
Prospect Hill,
Douglas,
Isle of Man,
IM1 1ET,
British Isles

Email: ask@inforights.im

Telephone: + 44 (0) 1624 693260

A WEALTH *of* DIFFERENCE

www.utmostinternational.com

Calls may be monitored and recorded for training purposes and to avoid misunderstandings.

Utmost International Isle of Man Limited is registered in the Isle of Man under number 24916C. Registered Office: King Edward Bay House, King Edward Road, Onchan, Isle of Man, IM99 1NU, British Isles. Tel: +44 (0)1624 643 345. Licensed by the Isle of Man Financial Services Authority.

Utmost Trustee Solutions Limited is registered in the Isle of Man under number 106739C. Registered Office: King Edward Bay House, King Edward Road, Onchan, Isle of Man, IM99, British Isles. Licensed by the Isle of Man Financial Services Authority.

Utmost Wealth Solutions is registered in the Isle of Man as a business name of Utmost International Isle of Man Limited.

Utmost Trustee Solutions is registered in the Isle of Man as a business name of Utmost Trustee Solutions Limited.

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