

## Data Protection Notice

Tax & Advise Ltd (“we”, “us” or “our”) recognizes the importance of protecting your privacy.

This notice describes how we collect, hold, use and disclose personal information that you provide, is provided on your behalf or is collected by us.

### 1 What personal information do we collect?

We collect personal information that is required to enable us to provide a range of services including, accounting, tax and corporate secretarial services (our “Services”) to our clients and related parties (“Clients”). In the provision of our Services, we may therefore process personal information relating to you in your capacity as a director, officer, authorized signatory, employee and/or beneficial owner (a “related person”) of our Client.

The kinds of personal information that we may collect include:

Demographic Data	Name, gender, date of birth, age, nationality
Contact Details	Home/work landline phone number, personal/work mobile, home/work postal address, personal/work email address
Financial Data	Bank account number
Government Identifiers	Passport copies, personal public service number, driver's licence, income tax number
Criminal records and political associations	Criminal records and political associations, where they are revealed by client screening procedures

### 2 How we collect personal information?

We collect personal information in various ways, including:

- client due diligence enquiries and on-boarding documentation;
- other forms and agreements; and
- correspondence, which may include written, telephone or electronic communications.

In some circumstances, we may collect personal information about you from a third party or from publicly available sources. The parties from whom we may acquire personal information may include our affiliates, Clients in which you are or were a related person, other Client service providers including your adviser or anyone you have authorized to deal with us on your behalf.

In addition, our websites use 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit any of our websites. They help us make the sites work better for you.

### **3 How we use personal information?**

We use information about you to:

- provide relevant services and identify ways we can improve our services;
- providing you with information or assistance that you request from us;
- meet our legal and regulatory obligations, including to carry out anti-money laundering checks and related actions, to comply with production and court orders and to report tax related information to tax authorities;
- monitor electronic communications for investigation and fraud prevention purposes, crime detection, prevention and investigation; and
- market and promote complementary services; as well as any other uses identified at the time of collecting your personal information.

If we do not collect this personal information, we may not be able to provide our Clients with the services or assistance requested.

### **4 How long will we keep your personal information?**

To meet our legal and regulatory obligations, we will hold your personal information while our Services are ongoing and for a period of time after that. This would usually be for a minimum period of 6 years from the date on which our Services are terminated or 10 years from the date on which a bank account with which you are associated has been closed. We may retain it for longer if required in connection with ongoing complaints, litigation or investigations or to comply with applicable legal/regulatory obligations. However, we will not hold your personal information for longer than necessary.

### **5 Legal Basis for Using Your Personal Information**

There are different legal bases that we rely on to use your personal information, namely:

- **Compliance with legal obligations** – The use of your personal information may be necessary to comply with legal and regulatory obligations such as those set out under anti-money laundering and counter terrorist financing laws;
- **Performance of a Contract** - The use of your personal information may be necessary to perform the contract that you have with us so that we can provide the services and products that you have engaged us to provide to you.

- **Legitimate interests** – We may use your personal information for our legitimate interests to improve our services, quality assurance, training and for administrative purposes including sharing of data with our affiliates for AML/CFT purposes.

## 6 Security

We implement and maintain physical, electronic and procedural safeguards and security measures which are reasonably designed to protect your personal information. For example, we implement:

- security measures for access to our business premises;
- security procedures within our offices; and
- IT security measures, including password protection, firewalls, intrusion detection and site monitoring.

These measures are in place to protect your personal information that we hold from misuse, interference and loss, and from unauthorized access, modification or disclosure. However, such measures are never completely secure.

## 7 Your personal information and third parties

We may disclose your personal information to Citco affiliates for legitimate business purposes (including providing services to you) in accordance with applicable law. Sometimes we may also share your personal information with:

- third party service providers or suppliers engaged by us to perform functions or activities on our behalf;
- Clients of which you are a related person;
- service providers to Clients of which you are a related person, such as legal advisers;
- regulators, law enforcement, tax authorities or other or government authorities as required to comply with our legal and regulatory requirements; and
- other entities identified at the time of collecting your personal information or to which we are legally required to disclose your personal information.

This list of possible disclosures is not intended to be exhaustive and there may be other legitimate purposes for holding, disclosing or otherwise processing your personal information. Where the law so requires, you will be notified of any additional purposes and where required your consent will be sought.

## 8 International transfer of data

The sharing of personal information with the third parties set out above may involve the transfer of data to jurisdictions outside the European Economic Area (EEA) and in particular to any of our subsidiaries offices located overseas. Such countries may not have the same data protection laws as your jurisdiction. However, we shall ensure that the transfer of data by us outside the EEA is subject to a contract incorporating standard contractual clauses in the form adopted by the European Commission under Decision 2010/87/EU, Decision 2004/915/EC or an equivalent or replacement decision (the Model Clauses) or permitted pursuant to an adequacy decision.

## 9 Your personal information rights

You have various rights in relation to your personal information, including the right to request access to your personal information, correct any mistakes on our records, erase or restrict records where they are no longer required, object to use of personal information based on legitimate business interests.

We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than within one month after of receipt of your request. In exceptional cases, we may extend this period by two months and we will tell you why. We may request proof of identification to verify your request. To exercise these rights please contact us using the details below.

## 10 Questions or Complaints

For questions about this notice, to exercise your rights regarding your personal information held by us, or to make an enquiry, please contact us at info@[taxandadvise.com](mailto:info@taxandadvise.com) or write to us at: c/o Tax & Advise Ltd, 10 Philpot Lane, London, EC3M 8AA.

You may make a complaint about an alleged breach by us of applicable privacy laws in relation to our handling of your personal information. Your complaint should be in writing and addressed to [info@taxandadvise.com](mailto:info@taxandadvise.com). Alternatively, you have a right to lodge a complaint with the Information Commissioners Office.