



Standard Bank
Offshore Group

Client Privacy Statement

This document explains our privacy principles and how we apply them. It will be posted on www.international.standardbank.com

Privacy Statement

Your privacy is important to us and we know that you are concerned about how we use your personal data. Standard Bank Group Limited and its subsidiaries (Group, we, us, our) collects and processes your personal data according to the Privacy Statement (<http://www.standardbank.com/pages/StandardBankGroup/web/Privacy.html>).



What this Privacy Statement covers and Contact Details

This Privacy Statement applies to all clients (as defined below) (“**you, your**”) of any company (a data controller) within the Standard Bank Offshore Group (“**we, us, our**”).

“**Standard Bank Offshore Group**” is the collective term for a group of companies that are based in Jersey, the Isle of Man and Mauritius, and which are ultimately jointly owned by Standard Bank Group Limited and Standard Bank Group International Limited. Details of the companies that comprise the Standard Bank Offshore Group and their contact details can be found at the end of this statement.

The relevant Standard Bank Offshore Group data controller(s) in respect to your personal data will, unless otherwise stated, always be the Standard Bank Offshore Group company(ies) with whom you:

- a) have made an enquiry as regards the provision of one of our products and/or services but whose products and/or services you have not yet formally applied for; and/or
- b) are presently applying to for the provision of one of our products and/or services; and/or
- c) already have a formal written contract (either a letter of engagement, and/or terms and conditions, and/or a written agreement, and/or any other legally binding documentation) for that Standard Bank Offshore Group company(ies) to provide you personally with the products and/or services you require; or
- d) if you do not have a formal written contract but are associated or connected (for example, as an ultimate beneficial owner, in some managerial capacity, or a protector of a trust), to a customer or non-natural customer or potential customer (for example, a trust, company, foundation or other non-natural customer) of a Standard Bank Offshore Group company(ies) then the Standard Bank Offshore Group data controller(s) in respect to your personal data will be the Standard Bank Offshore Group company(ies) which that customer or non-natural customer has either enquired of, and/or applied to, and/or has a formal written contract with (either a letter of engagement, and/or terms and conditions, and/or a written agreement of some description and/or any other legally binding documentation).

For the purposes of this Privacy Statement “client” is to be given its widest possible interpretation and includes, but is not limited to, any natural person being a past, present or prospective client or customer of a Standard Bank Offshore Group company for the provision of products and/or services. Client also includes any natural person associated with or connected to a non-natural past, present or prospective customer of a Standard Bank Offshore Group company and whose personal data that Standard Bank Offshore Group company collects and uses as a result of this association or connection. Client therefore includes any natural person associated with or connected to a trust, company, foundation, or any other legal or non-legal entity, structure or body to whom a Standard Bank Offshore Group company provides a product and/or service (for example, a human director, shareholder, account signatory, trustee, protector and beneficiary).

The Standard Bank Offshore Group’s appointed representative in the European Union for data protection purposes can be contacted at:
EURepresentative@standardbank.com



The Standard Bank Offshore Group’s appointed Data Protection Officer (“DPO”) can be contacted on the below details:

Jersey:

Data Protection Officer
Standard Bank Jersey Limited
47–49 La Motte Street
St. Helier
Jersey
JE2 4SZ
Telephone: +44 (0)1534 881188
Email: JerseyDataProtection@standardbank.com

Isle of Man:

Data Protection Officer
Standard Bank Isle of Man Limited
One Circular Road
Douglas
Isle of Man
IM1 1SB
Telephone: +44 (0)1624 643647
Email: IOMDataProtection@standardbank.com

Mauritius:

Data Protection Officer
Standard Bank Trust Company Mauritius Limited
Level 9, Tower B,
1 Cyber City, Ebene,
Mauritius, 72201
Telephone: +230 402 6009
Email: MauritiusDataProtection@standardbank.com

Regardless of which Standard Bank Offshore Group company(ies) is/are your data controller(s) we treat the personal data we collect from you or about you through, for example, any application forms you may complete (electronically or in hard copy), our website(s), associated websites, mobile sites, mobile applications and other communication channels as private and confidential.



This Privacy Statement provides an overview of:

- the type of personal data we collect and use;
- the purposes for which we use it (including whether you have an obligation to provide us with your personal data and any consequences of you not doing so);
- how we collect your personal data;
- where we keep your personal data;
- how we keep your personal data secure;
- who we disclose your personal data to and where those recipients are in countries outside of those of the Standard Bank Offshore Group how we safeguard those arrangements;
- how long we keep your personal data for;
- your rights in respect to your personal data and how you can exercise those rights; and
- whether your personal data is subjected to any automated decision-making, including profiling, and information about the logic, the significance and envisaged consequences of that decision making for you.



What is personal data, and what personal data do we collect, have or compile about you?

Personal data is information which identifies an individual person or from which an individual person is identifiable.

Depending on the nature and means of your enquiry and/or the product/service sought or provided then we will typically collect and use:

- your contact information: your name (and any previous names); your home and/or business address(es); your telephone number(s); email address(es); and any other contact information we reasonably require;
- other personal data about you: your identity and/or passport documentation; proof of address documentation; source of wealth information; bank account, financial and tax information; transactional information on your accounts/dealings; your marital status; your gender; date and place of birth; your occupation and income including employment history; your dependants; your signature; photographs or other visual images of you such as CCTV footage; shareholder information such as number of shares and structure of shareholding; telephone conversations with our staff; and information you provide for secure passwords;
- certain "**special category/sensitive personal data**", by which we mean information relating to political opinions/exposure you or those closely related/associated to you may have, trade union memberships held, criminal behaviour, and, in certain cases, ethnicity and health and disability related information; and
- certain other personal data about you as collected by our cookies when you visit our web pages (see further explanation below and the cookies pop-up we use when you visit our applicable websites).

The personal data mentioned above is an indicative list only and not exhaustive.



Why we use your personal data?

As a client of a Standard Bank Offshore Group company, we collect and use and share your personal data primarily:

1. to ensure we comply with any applicable anti-money laundering or other relevant laws (for example, investment, banking, trust and corporate services and/or tax reporting laws) that we are subject to; and
2. where you are enquiring, or applying to become, or already are one of our existing personal clients, then as is necessary to provide you with requested products or services, or for the performance of, or to take steps on your behalf and at your request to enter you into, a contract that you are, or will be, party to with a relevant Standard Bank Offshore Group company or third party.

We therefore will need to gather and use your personal data when you require a bank account, a loan, a debit card, and any other banking, investment or fiduciary products or services from us.

Where we collect and use and share your personal data on the above legal bases then failing to provide the necessary personal data to us will result in our being unable to offer or supply you with the products and/or services you require.

Where our collecting and use of your personal data is not on the above legal bases then we will only collect and use and share your personal data:

3. if it is in your or another person's **vital interests** for us to do so (for example, in an emergency situation where harm may otherwise result); or
4. in some circumstances, where we seek your explicit consent to our collecting and/or using and/or sharing your personal data. This may be for example where we believe you will be interested in hearing from other companies within the Standard Bank Group for the purposes of wealth management planning or from trusted third parties which supply complementary products/services. Where this is the case, we will fully inform you of what we plan on doing with the data and you will then have the opportunity to consent (and have the right to withdraw that consent at any time) or decline.
5. in circumstances where:
 - (a) the personal data is not sensitive/special category data; and
 - (b) we or a third party have a legitimate interest in processing it; and
 - (c) after considering your personal fundamental rights and freedoms we do not determine that our/the third party's legitimate interest is, on balance, overridden by your rights and freedoms; and
 - (d) in undertaking that balancing exercise we have taken into consideration your reasonable expectations as to what the data might be used for based upon your relationship with us.

We may rely on the **legitimate interests** basis to use and share your personal data for:

- i) communication/marketing purposes by the Standard Bank Offshore Group company of which you are a customer when you have not opted-out;
- ii) ensuring the protection of the interests and reputation of the Standard Bank Group of companies;
- iii) enabling our service providers to meet their legal and regulatory obligations where their services assist or enable us to perform our contract with you;
- iv) prevention and detection of crime, including fraud;
- v) service/product provision and delivery including the provision of administrative services by other entities within the Standard Bank Group of companies;
- vi) business intelligence/management information generation;
- vii) IT support services;
- viii) the safety of our clients, staff and the wider public; and
- ix) for handling enquiries, complaints and legal claims.

in very rare cases, where the personal data is special category/sensitive data and our using it is necessary **to establish, exercise or defend a legal claim**.

For more specific information on who we share your personal data with please see "Who we disclose your personal data to and why."



Marketing by electronic means

If we have previously communicated marketing information to you and you have not elected to unsubscribe or otherwise "opt out" from those communications, which you are entitled to do at any time, or if you are a new client, and you do not unsubscribe or "opt out" then we will contact you from time to time with such marketing information.

We will usually do this through telephone calls, email, messaging services, social media platforms or notify you on your mobile applications. If you have not already done so, you may select your preferred method of communication by contacting us.

You always have the right to opt-out of receiving these marketing communications at any time by following the instructions on the communication itself or through our customer service channels.

We will always seek your consent before sending any marketing or promotional materials to you about products and services from any of our other Group companies or from any third-party service provider.



Our use of technology to follow your use of our websites

While you are using our websites or mobile applications, we automatically process certain personal data. We use this information to find out which areas of our websites people visit most and to monitor the use of our websites. This helps us to add more value to our services. This information is gathered in such a way that we do not get personal data about any individual or their online behaviour on other websites.

Cookies

As you may already be aware from our website cookie pop-up messages, we use cookie technology on some of our websites. A cookie is a small text file that is saved on your Internet browser when you use our websites. The cookie is sent to our computer each time you visit our websites. Cookies make it easier for us to give you a better experience online. You can stop your browser from accepting cookies, but if you do, some parts of our websites or online services may not work. We recommend that you allow cookies.

Links to other websites

Our website, related websites and mobile applications may have links to or from other websites. Although we try to link only to websites that also have high privacy standards, we are not responsible for their security, privacy practices or content. We recommend that you always read the privacy and security statements on these websites.

Monitoring and/or recording of communications

We communicate with you through different methods and channels.

Where required by law or where we have considered it to be in our legitimate interests for the prevention and detection of crime, the safety of our clients, staff and the wider public, and for handling enquiries, complaints and legal claims, or training purposes, we may record and monitor our electronic communications with you, including our telephone conversations.

Social media

We operate and communicate updates through our designated channels, pages and accounts on some social media sites to inform, help and engage with our customers. We monitor and record comments and posts made about us on these channels so that we can improve our services.

The general public can access and read any information posted on these sites. We are not responsible for any information posted on those sites other than the information posted by our designated officials. We do not endorse the social media sites themselves, or any information posted on them by third parties or other users.

When you engage with us through social media your personal data may be processed by the site owner; this process is outside our control and may be in a country outside of the Isle of Man, Jersey and Mauritius that may have different privacy principles.

Social media sites are not appropriate forums to discuss our customers' products or financial arrangements. We will not ask you to share personal, account or security information on social media sites.

We regularly update and monitor our social media accounts and welcome feedback and ideas sent to us through these channels. We try to join conversations whenever possible, but may not reply to all messages sent to official Standard Bank social media accounts.



How do we obtain your personal data?

Most of the personal data we have about you is, or was, provided by you or by a customer or non-natural customer with which you are connected (such as an Independent Financial Adviser or an Introducer). Alternatively, it may be updated or generated during the course of your client relationship with us. We therefore collect personal data directly from you, and where lawful and reasonable, we may collect personal data about you from third parties and publicly available sources, such as credit reporting and government agencies.

Where we keep your personal data

Our electronic systems and databases are used to process and store your personal data for the purposes of administering our client relationships and related activities. All such systems and databases only collect, receive, use and share your personal data in accordance with, and as permitted by applicable laws, and/or internal business policies, standards, processes and procedures applicable to Standard Bank Offshore Group.

Where client personal data is retained in hard copy (paper) format it is kept secure and safe in locked secure storage either onsite at our various Standard Bank Offshore Group company office locations or outside those office locations with duly vetted and reputable safe storage organisations.



How we keep your personal data secure

We use appropriate technical and organisational measures to keep your personal data secure taking into account, amongst other things, the sensitivity of the personal data, the number of clients whose personal data we collect and process, the technologies available to secure it and their cost.

These measures are specifically designed and updated to prevent unauthorised access to/processing of your personal data and/or its accidental loss, destruction or damage. A general description of some of these security measures are set out below.

All our Standard Bank Offshore Group offices are equipped with certain physical access/security systems including secure entry systems and auto-lock door mechanisms, alarm and CCTV systems.

All staff within those offices are subject to our standard take on and vetting processes and have contracts obliging them to keep our data confidential and restricting their use of that data.

All staff are further obliged to adhere to comprehensive written policies and procedures and undertake regular and ongoing training. This address, amongst other things, our clear desk policies, screen locking, use of own devices, disposal of confidential waste, encryption of data, and the use of passwords on the systems they use. Certain staff also have assigned roles and responsibilities to help ensure the security and integrity of our data – including our Data Protection Officer. We restrict access to our IT systems to those personnel that require it in the performance of their role(s) and where possible endeavour to anonymise the personal data held.

Our IT systems are inherently designed and regularly updated to try to ensure they remain as secure as possible. We use secure servers, firewalls, virus and ransom scanning software, and employ a team of IT professionals to support these systems.

We have a framework in place for undertaking data protection impact assessments whenever a proposed new project or initiative involving our use of personal data is likely to result in a high risk to the individuals whose personal data is affected and in order to identify, manage and address any privacy risks posed.



Who we disclose your personal data to and why?

We maintain comprehensive and detailed registers of all the 3rd parties with whom we share personal data that we are responsible for.

These registers include information on 3rd party service providers that we instruct and who process personal data on our behalf (our data processors), and also 3rd parties we may otherwise share personal data with (such as service providers who are also data controllers and tax or regulatory or government authorities – our data transfers).

The registers also include information regarding the countries/territories in which each those organisations are based.

Where we share personal data it is primarily with other organisations in countries/territories in which the Standard Bank Offshore Group companies are themselves based (Isle of Man, Jersey and Mauritius) and/or certain other countries/territories that are either part of the European Economic Area (EEA) or have been granted EU adequacy rulings from a data protection perspective (if different).

The only other organisations with which we may routinely share certain limited client personal data as required for the specific purposes for which it is required are:

- tax and/or regulatory and/or governmental and/or law enforcement/judicial authorities in your home country/territory or other countries/territories where we are legally obliged to do so;
- where you have used a financial adviser and/or other professional adviser/services business to engage and/or liaise with us on your behalf the wider Standard Bank group of companies (see <https://www.standardbank.com/>. For our different Standard Bank offices and their locations), including South Africa, when necessary, proportionate and lawful to do so;

- limited sharing to service providers in the USA for service management solutions in supporting some of our information technology requirements and with VISA in relation to various matters concerning the security of our debit card offering;
- other banking and/or financial services and/or investment services providers and institutions worldwide where we are required to provide personal data (sometimes of both the remitter and the payee as part of an instruction) for cheque or payment or transaction processing on your behalf;
- other employer organisations worldwide with whom you have indicated having past or present employment and where we may seek to verify any past or present employment you have confirmed details of to us;
- other business/professional services/product providers worldwide where this is required by you or considered necessary in our legitimate interests for the provision and delivery of our services/products to you or in order for us to establish, exercise or defend a legal claim (see the Categories of other business, professional services and product providers table below):

Vendor category	Definition
Managed Services	A service supplier that manages and assumes responsibility for providing a defined set of services to the Standard Bank Offshore Group, for example, Debit Card Services.
Co-managed	A partnership arrangement between a vendor and the Standard Bank Offshore Group companies in which they work together using each of their respective knowledge/specialist skills/systems to achieve the end goal, for example, local Telecoms companies.
Hardware/Software Supplier	Companies/individuals that specialise in providing the Standard Bank Offshore Group with appropriate software and hardware to support the business needs, such as Microsoft.
Professional Services	An organisation or professional that offers customised, knowledge-based services to the Standard Bank Offshore Group companies. They include lawyers, advertising professionals, accountants, property surveyors, and financial advisers.
Business Consultants	Used for various projects required to implement change initiatives for the Standard Bank Offshore Group companies, for example, changes to enhance client experience or to implement new processes to ensure compliance with new legislation and regulation.



Safeguards when we share personal data

When we share personal data with a data processor then we ensure we have a lawful basis for doing so, have a formal vetting procedure that we follow to assess that data processor's ability to look after any personal data shared with them, ensure we have a written contract in place with them to apply appropriate safeguards to protect personal data to a standard and in a manner that provides us with sufficient guarantees as to the security of that personal data and undertake ongoing monitoring of that relationship.

When we share personal data with another third party but not to process that personal data on our behalf then we ensure we have a lawful basis for doing so, have a formal procedure that we follow to consider and approve the transfer beforehand,

and we follow best practice guidelines to govern the data privacy elements of the relationship whenever that is possible.

Where the personal data is to be shared with organisations outside of the EEA or those countries with adequacy rulings then we naturally consider such sharing of personal data as likely to result in a high risk to the privacy of the individuals whose data is being shared. In such circumstances, we follow our procedures as outlined above, which include an assessment to ensure we can lawfully share and that adequate measures are taken to protect the personal data being shared including the implementation of EU Standard Contract Clauses where appropriate.



Legal disclaimer

We reserve the right to disclose your personal data to governmental bodies, exchanges and other regulatory or self-regulatory organisations should we be required to do so by law or should we believe that such action is necessary to:

- comply with the law or with any legal process;
- exercise, protect and defend our legal rights and property;
- prevent fraud, theft or abuse; and/or
- protect your personal safety or property and that of our staff or other customers or the general public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may disclose such information to the appropriate regulatory bodies and commercial entities).

In addition, we may disclose data, if required to do so, to any regulatory authorities in connection with any investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability.



How long we keep your personal data for

We only hold personal data in a format which permits your identification for as long as is necessary for the purposes for which it was obtained.

Where legal requirements oblige us to retain records for a particular period of time then those periods are the minimum period for which we will retain the relevant record.

Comprehensive, local law compliant, record retention and disposal policies for all of the different types of records we hold exist for each of the three jurisdictions (Jersey, Isle of Man and Mauritius) in which the data controllers of the Standard Bank Offshore Group operate.



Your rights

You have a number of rights in respect to your personal data:

1. You have a right of access to your personal data;
2. You have a right to take action to rectify inaccurate personal data;
3. You have a right to erase personal data;
4. You have a right to restrict the processing of your personal data;
5. You have a right to data portability;
6. You have a right to object to processing of personal data (including direct marketing);
7. You have a right not to be subject to a decision based solely on automated processing of your personal data, including profiling, which produces legal effects/significantly affects you;
8. You have a right to seek compensation for any material or non-material damage caused by a breach of our statutory obligations to look after your personal data;
9. You have a right to lodge a complaint with a data protection supervisory authority; and
10. You have a right to an effective judicial remedy against us.

General information on each of these rights, with any applicable conditions or pre-requisites to their exercise, and how to exercise them can be found by looking at our "Your Data – Your Rights" booklet. This booklet is located on our website at www.international.standardbank.com/dataprotection or by requesting a copy by contacting your DPO at the details above. Further specific information can be obtained from our data protection supervisory authorities, the contact details for which are provided at the end of the "Your Data – Your Rights" booklet.

Circumstances where your personal data is subjected to any automated decision-making, including profiling, and information about the logic, the significance and envisaged consequences of that decision making for you.

We do not currently subject your personal data to any automated decision making, however, if this changes, we will amend this Privacy Statement accordingly.



Profiling for direct marketing

Where you have not opted out of receiving our direct marketing communications then we will automatically profile your personal data for direct marketing purposes.

The logic of doing this is to use your personal data (for example, your age, sex, demographic, existing products and services) to provide you with information on other products or services that may be of relevant/interest to you given your specific personal circumstances.

The consequences of this form of profiling are that you will receive more useful and relevant marketing and offer information from us.

Profiling for unusual and/or fraudulent activity

We automatically profile your account/transaction activity to try and spot unusual or fraudulent transactions in order to help prevent and detect crime and to help us “know our client” to better comply with applicable anti-money laundering legislation.

The logic of doing this is to use your personal data (for example the frequency, currency, amounts, places of your typical transactions) to spot anything out of the ordinary and hopefully prevent loss/damage from occurring to either you or us.

The consequences of this form of profiling are that you may from time to time be contacted about a particular transaction in order to confirm whether it is a legitimate transaction and that we may have to report any suspicious activities to the relevant law enforcement authorities.

EU Representative Office

Pursuant to Article 27 of the General Data Protection Regulation (GDPR), we have appointed European Data Protection Office (EDPO) as our GDPR Representative in the EU. You can contact EDPO regarding matters pertaining to GDPR, where you wish to exercise your rights:

- By using EDPO's online request form on <https://edpo.com/gdpr-data-request/> or
- By writing to EDPO at Regus Block 1, Blanchardstown Corporate Park, Ballycoolin Road, Blanchardstown, Dublin D15 AKK1, Ireland.



Right to change this privacy statement

We may change this privacy statement. We will publish all changes on our websites. The latest version of our privacy statement will replace all earlier versions, unless otherwise stated.

Queries and complaints

If you have any queries or complaints about privacy, please contact your Standard Bank Offshore Group Data Protection Officer.

Date published: March 2022

Standard Bank Offshore Group companies contact details

Standard Bank Isle of Man Limited

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Standard Bank Jersey Limited

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Standard Bank Offshore Trust Company Jersey Limited

47–49 La Motte Street
St. Helier
Jersey JE2 4SZ
Telephone: +44(0)1534 881188
Email: trust@standardbank.com

Standard Bank Trust Company Mauritius Limited

Level 9, Tower B,
1 Cyber City, Ebene,
Mauritius, 72201
Telephone: +230 402 6000
Email: sbtm@standardbank.com

Standard Bank Jersey Limited and Standard Bank Offshore Trust Company Jersey Limited are regulated by the Jersey Financial Services Commission. They are registered in Jersey as company numbers 12999 and 9153 respectively. Their business address is Standard Bank House, 47 – 49 La Motte Street, St. Helier, Jersey, JE2 4SZ.

Standard Bank Isle of Man Limited is licensed by the Isle of Man Financial Services Authority. Standard Bank House, One Circular Road, Douglas, Isle of Man, IM1 1SB. Registered in the Isle of Man No. 4713C.

Standard Bank Trust Company (Mauritius) Limited is regulated by the Financial Services Commission, Mauritius, to provide corporate and trust services and does not fall under the regulatory and supervisory purview of the Bank of Mauritius. Business registration number: C06021609. Level 10, Tower A1, 1 Cyber City, Ebene, Mauritius.

The above entities are wholly owned subsidiaries of Standard Bank Offshore Group Limited whose registered office is Standard Bank House, 47 – 49 La Motte Street, St Helier, Jersey, JE2 4SZ.

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GMS-19121 09/2021

