

Omnium Investments PCC Limited

Privacy Notice

April 2021

Introduction - How we use your personal information

This Notice sets out how Omnium Investments PCC Limited (“the Company”) will handle your personal data and other information about you in accordance with the requirements of the Data Protection (Bailiwick of Guernsey) Law 2017 (“the Law”). The European Commission has determined, on the basis of article 45 of the General Data Protection Regulation (EU) 2016/679 (“GDPR”) that the Guernsey law offers an adequate level of data protection.

For the purposes of the Law, the Company is a data controller in respect of personal information that we collect, process, transfer and store in connection with the products and services that we offer our customers. In this notice, references to “we”, “us” or “our” are references to the Company.

The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business. “Personal information” means information that relates to a living individual who can be identified from that information (either by itself or when it is combined with other information). It does not include data where the identity has been removed (anonymous data).

How is your personal information collected?

We use different methods to collect personal data from and about you including:

- through direct interaction with you when you apply for our products and services, subscribe to a publication or service, request marketing information to be sent to you, give us some feedback or take part in a competition, promotion or survey; or
- through third parties or publicly available sources including providers of technical, payment and delivery services, internet search engines, public media sites, commercially available subscription based sources and publicly available sources such as Companies House, the Guernsey Registry or electoral registers.

The type of personal information we collect

We collect and use your information including:

- personal details such as your name, identification number, address, date and place of birth, ‘know your client’ documents (including a copy of your passport or national identity card), and contact details;
- financial information, including payment and transaction records and information about your assets, your source of wealth and tax-related information;
- professional details, such as your job title and work experience, and your knowledge of and experience in investment matters;
- details of our interactions with you including feedback, any survey responses, how you use our website, and the products and services you use (including without limitation, any records of the phone calls between you and us);
- when you access our Website, data transmitted by your browser and automatically recorded by our server, including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your web browser, browser language and requesting domain, and IP address; and
- your communications preferences and your preferences in receiving marketing from us and third parties.

If relevant to the products and services we provide to you, we may also collect information about your business partners (including other shareholders or beneficial owners), dependents or family members, representatives, and agents.

The purposes for which we collect and use your personal information

We will use your personal information in accordance with the Law. We do not rely on your consent as a legal basis for processing your personal information, other than for consent to market products and services to you. These are the legal bases that we rely on in order to collect and process your personal information:

Where we need to perform the contract we are about to enter into or have entered into with you. This includes:

- Onboarding and maintaining you as a client, ensuring that we have up to date contact details for you, and ensuring that we know how you would like to be contacted;
- Ensuring that our products and services are suitable for you;
- Ensuring that we have all of the necessary details to process and deliver your orders;
- Protecting you from fraud;
- Ensuring that we can contact you if there are changes to our terms and conditions or important notices, like this Privacy Notice, to make you aware of.

Where it is necessary to comply with our legal or regulatory obligations. This includes:

- Onboarding and maintaining you as a client and ensuring that we understand how you generated your wealth;
- Reporting transaction details to market and regulatory authorities where required, and ensuring that payments to and from you contain all of the information necessary under wire transfer legislation;
- Screening your details against international sanctions lists to ensure that we do not do business with sanctioned individuals or entities;
- Ensuring that other required reporting to regulatory authorities, law enforcement agencies and other government bodies takes place (please see the next section for examples of these bodies) including for the purposes of preventing fraud and the detection and investigation of crime.

Where it is necessary for our legitimate interests, providing that your interests and fundamental rights do not override those interests. This includes:

- The recovery of fees or debts due to us;
- The analysis of how customers use our products and services in order to inform our marketing strategy, further develop and tailor those products and services and grow our business;
- If you use our website, the analysis of the technical data transmitted by your browser, so that we can ensure that our website is as up to date and relevant as possible.
- The analysis of your communications with us, including feedback and responses to any surveys, in order to improve our products and services;
- For The Company's prudent operational management (including credit and risk management, insurance, audit, systems and products training and similar administrative purposes);
- In cases where The Company needs professional advice on a matter related to you.

Special category data

The Company is required under Guernsey's financial crime regulatory framework to verify certain information such as their source of wealth. The Company may utilise open source intelligence available using public search engines, information recorded on public media sites as well as other commercially available subscription based sources in order to do this. This open source information may contain special category data such as references to, for example, political opinions and affiliations, religious or philosophical beliefs and to offences committed or alleged to have been committed. The Company does not rely on your consent for collecting and processing this special category data because it is necessary to do so in order to comply with a legal or regulatory obligation.

Marketing

We would like to use your personal information to tell you about products and services that we think may be of interest to you. We believe that it is necessary for our legitimate interests; i.e. to develop our products and services and to grow our business.

You have the right at any time to ask us to stop sending you marketing messages. To do this please contact your relationship manager in writing or write to us using the contact details at the end of this notice.

Please note that if you do tell us to stop sending you marketing messages, you will still receive other important communications from the Company such as statements, valuations and notification of changes to terms and conditions.

Who we provide information to

We may provide your information to third parties, including:

- third parties acting on your behalf or otherwise involved in a transaction with you, including: a party acquiring interest in, or assuming risk in or in connection with, the transaction; payment recipients, beneficiaries, account nominees, intermediary, and correspondent and agents of The Company ; clearing houses, and clearing or settlement systems; specialised companies or payment institutions such as SWIFT; card payment and platform providers; other financial institutions, credit reference agencies or credit bureaus (for the purposes of obtaining or providing credit references); any third party fund manager or investment manager who provides asset management services to you; and sub-custodians and central depositories;
- third parties providing services to us, including providers such as IT and hosting providers, marketing providers, communication services and printing providers, debt collection, tracing, debt recovery, fraud prevention, and credit reference agencies (and when we do so we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- third parties including potential purchasers who receive information in the context of the sale or proposed sale of our business or a reorganisation (and when we do so we take steps to ensure such potential purchasers keep the data secure);
- organisations that introduce you to us, or that we introduce you to;
- The Company 's professional advisers such as lawyers and auditors, and
- public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so. This list includes but is not limited to:
 - The Guernsey Financial Services Commission;
 - The Guernsey Income Tax Office;
 - Guernsey law enforcement authorities;
 - The States of Guernsey Policy and Resources Committee (in relation to sanctions measures);
 - The Guernsey Registrar of Beneficial Ownership (for Guernsey incorporated legal persons only);
 - The Guernsey Data Protection Commissioner;
 - Market authorities such as stock exchanges and securities commissions in the location of the market in which your transaction is taking place.

Some of the recipients referred to above may be located outside the European Economic Area. In those cases, except where the relevant country has been determined by the European Commission to provide an adequate level of protection, The Company requires such recipients to comply with appropriate measures designed by the European Commission to protect personal data.

How long will we keep your personal information?

We will keep your personal information for as long as you are a customer of the Company. After you cease to be a customer, we are required to keep your personal information for a period of 6 years in order to respond to any questions or complaints, show that we treated you fairly and comply with any legal and regulatory rules regarding record keeping. We may be required for legal or regulatory reasons to keep your personal information for longer than 6 years.

Your rights

Under certain circumstances, by Law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- Request correction of the personal information 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 information. This enables you to ask us to delete or remove personal

information where there is no good reason for us continuing to process it. Where your data was obtained for the purpose of a contract with us we are legally required, for regulatory purposes, to keep your personal data for defined periods of time (Usually for 6 years or more after the contract has ended). If your details were obtained through the basis of consent or legitimate interest then you have the right to ask us to delete or remove your personal information. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);

- Object to processing of your personal information 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 information for direct marketing purposes;
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- Request the transfer of your personal information to another party;
- Withdraw your consent for us to process your personal data. If you do withdraw consent, this will not apply to the processing of your personal data prior to withdrawal. Please also note that we may no longer be able to provide products and services to you if you withdraw your consent.

To exercise any of these rights, please contact us in writing using the contact information at the end of this notice.

Security note

We have in place appropriate technical and organisational measures to prevent unauthorised or unlawful access to the personal data you have provided to us. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means.

Contact information

If you are not satisfied with any aspect of the processing of your personal data by the Company, we would like to discuss it with you to understand how we can rectify the issue. Please contact:

The Data Protection Officer
Omnium Investments PCC Limited
Sarnia House
Le Truchot
St Peter Port
Guernsey
GY1 1GR

You also have the right to complain to the Guernsey Data Protection Commissioner whose website is:

<https://www.odpa.gg/>

The website includes details of how to make a complaint.

This privacy notice was updated in April 2021.