

JP Integra Group – Privacy Notice

General

This Privacy Notice sets out how the JP Integra Group (the “Group”) processes data, whether on individuals (including personal data in respect of individuals who are clients, intermediaries or other third parties the Group interact with, or any individual who is connected to those parties) or otherwise. Where the data held are on individuals, this document also sets out the rights of those individuals in respect of that personal data.

Any questions in relation to this Privacy Notice or requests in respect of personal data should be directed to privacy@jpintegra.com in the first instance.

Who we are

The Group is the leading Cayman specialist in fund, private equity, trust and corporate management and ancillary services (the “Services”) for international private, institutional and sovereign clients. We serve clients from across the globe.

The relevant Group entity with the primary relationship will be confirmed in an engagement letter in relation to any client relationship.

The Group primarily operates from the Cayman Islands which is a jurisdiction outside the European Union which has not been deemed adequate for European Union Data Protection purposes. However, please note that the Group operates a global Data Protection Policy, and all our offices are required to meet the same standard as our head office.

Details of the Group entities are provided at the end of this Privacy Notice.

The data we hold

The Group processes data in order to provide the Services. The type of data we may collect and process includes:

- Contact details (including names, postal addresses, email addresses and telephone numbers);
- Information required for the Group to meet legal and regulatory requirements, in particular in respect of anti-money laundering legislation, including information on source of funds and source of wealth;
- Information provided in the course of the provision of the Services (for example, information on professional relationships and background, financial wealth and assets held, transactions entered into, tax status, disputes and court proceedings engaged in);
- Financial information, such as payment related information;
- Professional interests and events attended;
- Meetings attended and visits to our offices;
- Any other information you may provide to us.

Purposes of processing

We use data (including personal data of individuals) for the following purposes (the below also confirming the lawful basis we are relying on in each case):

Purpose	Lawful Basis for Processing
To enter into client relationships and provide the Services	<p>Any one or more of the following:</p> <p>The legitimate interest of the Group as a provider of administration, fiduciary, accounting, establishment, management, liquidation, AML/KYC, FATCA/CRS and related services to process personal data for the purpose of providing those services</p> <p>In instances where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time by writing to privacy@jpintegra.com</p> <p>The processing is necessary for legal proceedings, the obtaining of legal advice or establishing, exercising or defending legal rights</p> <p>To enable the Group to fulfil the contract we have entered into with the individual to provide our Services</p>
To manage our client, intermediary and other business relationships	The legitimate interests of the Group to seek to ensure its business is conducted efficiently and with a view to enhancing client service
To ensure the security of Group systems, staff and premises (including the use of CCTV equipment)	The legitimate interests of the Group in protecting its systems, staff and premises from being misused or the victim of any criminal activity

<p>To provide our contacts with marketing material and to invite contacts to events which may be of interest to them, and to manage such mailings and events</p>	<p>The legitimate interests of the Group as a provider of the Services to process personal data to communicate with persons on topics and events which may be of interest to those individuals.</p> <p>The right of those individuals to unsubscribe from mailings and/or manage preferences will be noted within all mailings and any requests to unsubscribe may be made via links available in the mailings or by writing to privacy@jpintegra.com</p>
<p>To meet all legal, regulatory and ethical obligations applicable to the Group (including in respect of managing potential conflicts of interest)</p>	<p>The legitimate interests of the Group as a provider of administration, fiduciary, accounting, establishment, management, liquidation, AML/KYC, FATCA/CRS and related services to process personal data for the purpose of providing those services to the extent necessary to ensure it meets all legal, regulatory and ethical obligations incumbent on it.</p> <p>In certain instances, the processing of data may also be necessary for the exercise of functions of public authorities and/or necessary for compliance with a legal obligation to which the Group is subject.</p>
<p>For the purposes of internal know-how and training</p>	<p>The legitimate interests of the Group as a provider of administration, fiduciary, accounting, establishment, management, liquidation, AML/KYC, FATCA/CRS and related services to process data for the purposes of internal know-how and staff training. The Group will use reasonable endeavours to ensure any personal data contained in the material which is not integral to the understanding of the material is redacted.</p>

Sensitive Personal Data

We do not seek to collect or otherwise process your Sensitive Personal Data (such as political opinions, ethnicity, religion, sexual orientation, etc.); save that we may receive Sensitive Personal Data falling within special categories, such as that which relates to political affiliations as part of our politically-exposed-persons checks. Any processing of such Sensitive Personal Data will be necessary for reasons of substantial public interest and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests. There may be other occasions where we seek to process your Sensitive Personal Data,

on such occasions we will only use your personal data for the purposes which we will explain at that time.

Sources and Recipients of data

The sources of data may include clients, intermediaries, data subjects directly, third parties connected to the data subject (for example, their employer or another service provider who provides services to the data subject) or open-source material (such as the internet, business or social networks or commercial registers).

The provision of data to one entity in the Group may result in that data being accessible by all other members of the Group. Reasonable endeavours are made to ensure that data is only accessible by those with a need for access to fulfil the purposes set out above. Requests for access to be restricted in any particular manner should be made to privacy@jpintegra.com and will be considered and, where possible with reference to legal and regulatory obligations, actioned.

The following is a list of potential recipients of data (in each case including respective employees, directors and officers):

- Other members of the Group;
- Other providers of services (legal, governance or otherwise, including any bank or financial institution providing services in relation to any matter on which the Group is instructed) where disclosure to that provider of services is considered necessary to fulfil the purposes set out above;
- Any sub-contractors, agents or service providers of the Group;
- Courts or tribunals;
- Third parties with whom the Group engages for the hosting of events or other marketing initiatives;
- Law enforcement agencies where considered necessary for the Group to fulfil legal obligations applicable to it;
- Regulators or other governmental or supervisory bodies with a legal right to the material or a legitimate interest in any material;
- Any registrar of a public register where the data is to be included in a public registry;
- Potential parties with whom the Group intends to merge or sell any part of the Group.

JP Integra Group

Where the Group is entering into an engagement with a third party pursuant to which data may be processed by that third party, we will seek to enter into an agreement with that third party setting out the respective obligations of each party and will seek to be reasonably satisfied that the third party has measures in place to protect data against unauthorised or accidental use, access, disclosure, damage, loss or destruction.

In the event that any such third party is outside of the European Union and where the data being transferred would include personal data which would be protected under applicable Data Protection

regulation we will ensure we meet the relevant requirements of that Data Protection regulation prior to carrying out any such transfer. This may include only transferring the data where we are satisfied that:

- the non-European Union country has Data Protection laws similar to the laws in the European Union;
- the recipient has agreed through contract to protect the information in the same Data Protection standards as the European Union;
- we have obtained consent from relevant data subjects to the transfer; or
- if transferred to the United States of America, the transfer will be to organizations that are part of the Privacy Shield.

Rights of data subjects

Data subjects in the European Union (or any jurisdiction with equivalent legislation to the European Union General Data Protection Regulation) have certain rights in respect of their personal data.

Any such data subject wishing to exercise any rights under applicable data protection laws (including the right to withdraw any consent to processing previously given; the right of access to data; or to have data corrected, updated, rectified or erased; or for access to data to be restricted or provided to any third party; or to object to any particular processing) should send the request in the first instance to privacy@jpintegra.com.

In any case in which a data subject chooses not to provide any personal data or where any of the rights set out above are exercised to limit the processing of personal data the Group may be unable to provide relevant services, or there may be a restriction on the services which can be provided.

Retention

The Group only keeps data for as long as necessary to fulfil the purposes (as set out above) for which we collected it or for the duration of the business relationship. The Group may also store the data for as long as it is necessary or required in order to fulfil legal, contractual or statutory obligations, and for the establishment, exercise or defence of legal claims, and in general where it has a legitimate interest for doing so.

Any requests for further information in relation to the continued processing of specific data, and requests for destruction of data, should be made to privacy@jpintegra.com.

Group Entities

Full details of all Group entities are included in the About section of our website.

Changes to this Privacy Notice

We keep this Privacy Notice under review and any updates will appear on our website at www.jpintegra.com.

We last updated this Privacy Notice on 25 May 2018.

How to contact us

If you have any questions about this Privacy Notice or any data which we hold about you, please contact: privacy@jpintegra.com.