



PRIVACY NOTICE



INTRODUCTION

JTC Law takes your privacy seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, use, retain and share your Personal Data. It also explains your rights in relation to your Personal Data and how to raise a concern. Capitalised terms are defined below.

This privacy notice covers our Processing of Personal Data when you interact with us as a Data Subject, which includes your capacity as a client/customer. When we collect, use or are responsible for Personal Data about you, we are subject to Data Protection Laws.

JTC Law Jersey office's main establishment deciding the purposes and means of its processing of Personal Data is in Jersey. JTC Law Jersey's lead supervisory authority will generally be the Office of the Information Commissioner, Jersey. Jersey's legal framework for data protection is certified under the GDPR as 'adequate' (equivalent).

JTC Law (Cayman) LLP's main establishment deciding the purposes and means of its processing of Personal Data is in the Cayman Islands. JTC Law (Cayman) LLP's lead supervisory authority will generally be the Office of the Ombudsman, Cayman Islands.

1. DEFINED TERMS

Data Subject means the person to whom the Personal Data relates.

Data Protection Laws means the GDPR, the DPJL, the Data Protection Authority (Jersey) Law 2018, the DPA or equivalent laws as applicable.

DPA means the Data Protection Act (2021 Revision) of the Cayman Islands.

DPGO means the Data Protection Governance Officer.

DPJL means the Data Protection (Jersey) Law 2018.

GDPR means the General Data Protection Regulation 2016/679.

JTC Group has the same meaning as 'JTC' in the terms and conditions of JTC Group at www.jtcgroup.com/terms-of-business.

JTC Law or the **JTC Law Group** means the JTC Law group of entities as set out in the JTC Law Disclaimers, which can be found on at www.jtcgroup.com/services/jtc-law/. When we mention 'we', 'us' or 'our' in this privacy notice, we are referring to the JTC Law person or entity controlling your Personal Data.

Personal Data under the Data Protection Laws means any information that identifies or could identify you. In certain jurisdictions it is referred to as 'personal information'.

Processing means any operations performed on Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Special Category Data means Personal Data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade union membership, genetic and biometric data (when processed to identify an individual uniquely), data concerning health, sex life or sexual orientation, and in the Cayman Islands, Jersey and Guernsey, criminal records or alleged criminal conduct.

2. PERSONAL DATA WE PROCESS ABOUT YOU

We will never Process Personal Data outside of reasonable expectations. Depending on the nature of our interaction with you, our Processing encompasses:

- > **contact information**, including your postal address, email address(es), telephone number(s), company details and where applicable, social media contact information;
- > **identity information**, including your current and former names, gender, date and place of birth, nationality, passport information, and birth certificate;
- > **preference information**, including dietary restrictions, preferred correspondence language, professional interests, meetings and events attended etc. (including images or videos obtained during meetings or events hosted by us or attended at our offices);
- > **verification information**, including government-issued documents, bank statements, and utility bills and other information required for the JTC Law Group to meet its legal and regulatory requirements;
- > **taxation information**, including domicile, tax identification number, tax returns and tax advice;
- > **source-of-wealth information**, including pension plans, property sale documentation and loan documents;
- > **financial information**, including, bank account information, assets held and on what basis (eg legal/beneficial ownership, etc);
- > **trusts information** (if applicable), including settlor details and letters of wishes;
- > employment information;
- > **criminal records or allegations information**, including details of any official body's investigation of you and sanctions applying against you;
- > insolvency/bankruptcy/*en desastre* information (as applicable);
- > debtor information;
- > **connected-persons information**, including familial relationships;
- > **politically exposed person information**, including your political activities and relationships;
- > information in the public domain;
- > **correspondence** between you, your agents/representatives, and us;
- > billing, transaction and payment information; and
- > **technical data**, including information about how you use our website, IT, communication and other systems. Further information on how we process cookies data can be obtained by contacting the DPGO.

We collect and use this Personal Data to provide services to you. If you do not provide Personal Data we ask for, it may delay or prevent us from providing such services to you.

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect most of this Personal Data directly from you—in person, by telephone, video call, text or email and/or via our website. However, we may also collect information:

- > from publicly accessible sources, e.g. the Jersey Financial Services Commission Registry.
- > directly from a third party, e.g.:
 - > settlors, beneficial owners, employers, employees, financial services providers or their group entities or other third parties connected to you (for example, businesses contracted to obtain and confirm verification of identity);
 - > sanctions screening providers;
 - > customer due diligence providers, e.g. World Check; and
 - > professional suppliers.
- > from a third party with your consent, e.g. your bank or building society.
- > from cookies on our website.
- > via our IT systems, e.g.:
 - > from door entry systems, reception logs and videos or images taken during events at our offices or hosted by us;
 - > through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems; and
 - > we may from time to time record telephone calls.

4. HOW AND WHY WE USE YOUR PERSONAL DATA

Under Data Protection Laws, we can only use your Personal Data if we have a proper reason, including:

- > where you have given consent;
- > to comply with our legal and regulatory obligations;
- > for the performance of a contract with you or to take steps at your request before entering into a contract;
- > in the substantial public interest;
- > to protect your vital interests; or
- > where applicable, for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your non-sensitive Personal Data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

Where our basis for Processing your Personal Data is your consent, you can withdraw such consent without penalty. The table below further explains what we use your Personal Data for and why.

What we use your Personal Data for	Our reasons and interests
Entering into client relationships and providing legal services to you.	To perform our contract with you or to take steps at your request before entering into a contract (including, as examples, conflicts of interests, anti-financial crime procedures, client and matter management, billing and debt collection)
To manage our client and intermediary relationships and other business relationships.	To ensure the business is conducted efficiently and with a view to enhancing client service.
Preventing and detecting fraud or other unlawful financial activity against you or us.	To minimise fraud or other unlawful financial activity that could be damaging for you and/or us.
<p>Conducting checks to identify our customers and verify their identity.</p> <p>Screening for financial and other sanctions or embargoes.</p> <p>Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our regulators.</p>	To comply with our legal, financial and regulatory obligations.
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.	To comply with our legal, financial and regulatory obligations.
Operating IT systems, software and business applications.	To provide agreed services to you in a safe and efficient manner.
Ensuring security and internet use policies are adhered to.	To make sure we are following our own internal procedures so we can deliver the best service to you.
Operational reasons, such as improving efficiency, training and quality control.	To be as efficient as we can so we can deliver the best service to you at the best price.
Ensuring the confidentiality of commercially sensitive information.	<p>To protect trade secrets and other commercially valuable information.</p> <p>To comply with our legal and regulatory obligations.</p>
Statistical analysis to help us manage our business, eg in relation to our financial performance and for the purposes of our internal knowhow and staff training.	To be as efficient as we can so we can deliver the best service to you at the best price.
Preventing unauthorised access and modifications to systems.	To prevent and detect criminal activity that could be damaging for you or us. To comply with our legal and regulatory obligations.
Client/customer communication.	<p>To perform our contract with you or to take steps at your request before entering into a contract.</p> <p>To comply with our legal and regulatory obligations.</p> <p>To make sure that we can keep in touch with our clients, customers and contacts about existing orders and new products.</p> <p>To update our records.</p>

Statutory returns and regulatory filings.	To comply with our legal, financial and regulatory obligations.
Ensuring safe working practices, staff administration and assessments.	To assess and comply with our legal and regulatory obligations. To make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you.
Marketing our services and those of selected third parties to: —existing and former customers; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	To promote our business to existing and future clients.
External audits and quality checks, eg for the audit of our accounts.	To maintain our accreditations so we can demonstrate we operate at the highest standards. To comply with our legal and regulatory obligations.
Conducting surveillance over electronic/telephonic communication; recording CCTV footage.	To assure service quality, for training, to detect and prevent potentially unlawful conduct, including the protection of JTC Law, its staff, contractors, systems and premises.
To enforce or defend rights.	To ensure our rights and the rights of those under our scope of responsibility are protected.
To liaise with regulatory authorities.	To ensure we meet our reporting obligations and commitment to government agencies and law societies which have jurisdiction.

Where we Process your Special Category Data, we will also ensure we are permitted to do so under the Data Protection Laws, e.g.:

- > to protect your (or someone else’s) vital interests where you are physically or legally incapable of giving consent;
- > to comply with another law;
- > to prevent unlawful acts, including money laundering or other financial misconduct, and the financing of terrorism;
- > to establish, exercise or defend legal claims; or
- > where we have your explicit consent.

5. MARKETING

We may use your Personal Data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

Where we have a legitimate interest in using your Personal Data for marketing purposes (see above ‘How and why we use your Personal Data’) we do not usually need your consent. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by contacting us at info@jtc-law.com . You can also select to opt-out from all future marketing communications via unsubscribe link found in marketing emails.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your Personal Data with respect and never sell or share it with other organisations outside of the JTC Law Group and JTC Group for marketing purposes.

6. WITH WHOM WE SHARE YOUR PERSONAL DATA

We will share your Personal Data with companies within the JTC Law Group, JTC Group and third parties we use to help deliver our services to you, e.g. financial service providers, accountants, compliance service providers, payment service providers, data warehouses and delivery companies.

As required, we also share your Personal Data with:

- > JTC Group and other third parties we use to help us run our business, eg company secretarial, administrative, human resource, compliance service providers, consultants, marketing agencies or website hosts;
- > organisations with whom we co-host marketing events;
- > professional advisors, including lawyers, regulatory specialists, tax advisers and debt collectors;
- > IT service providers or other sub-contractors, agents or service providers of the JTC Law and JTC groups;
- > any government or public register where data is required to be included;
- > our insurers and banks;
- > intermediaries;
- > third parties you approve, e.g. social media sites you choose to link your account to or third party payment providers;
- > regulators, law societies or other government or enforcement agencies to whom we have a disclosure obligation; and
- > competent courts and tribunals who issue an order with which we are obliged to comply.

Whilst the ownership of each JTC Law Group entity is separate from and independent of the JTC Group, we are reliant on certain services and provisions provided by the JTC Group to carry out our business, including, for example, the provision of premises, security systems, human resource, compliance support and IT services. Accordingly, the provision of data to one entity in the JTC Law Group may necessarily result in that data being accessible by other members of the JTC Law Group as well as entities within the JTC Group as detailed on the JTC Group website.

We only allow our service providers to handle your Personal Data if we are satisfied they take appropriate measures to protect it. We also impose contractual obligations on service providers to ensure they can only use your Personal Data to provide services to us and to you. On occasion we may also need to:

- > share Personal Data with external auditors, e.g. in relation to ISO accreditation and the audit of our accounts;
- > disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations; and
- > share some Personal Data with other parties, such as potential buyers of some or all of our business or the JTC Group business or during a potential or actual restructuring, merger, sale or expansion of any part of our business or the business of the JTC Group —usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

7. WHERE YOUR PERSONAL DATA IS HELD

Personal data may be held at our offices and those of our group entities, third party agencies, service providers (including CRM systems and servers), representatives and agents as described above (see above: '**Who we share your Personal Data with**').

Some of these third parties may be based outside Jersey or the Cayman Island or jurisdictions where a JTC Law Group entity is located. For more information, including on how we safeguard your Personal Data when this happens, see below: '**Transferring your Personal Data Abroad**'.

8. HOW LONG WE WILL KEEP YOUR PERSONAL DATA

We will keep your Personal Data while you have a relationship with us or we are providing services to you. We will then keep your Personal Data only for as long as necessary:

- > to respond to any questions, complaints or claims made by you or on your behalf;
- > to show that we treated you fairly; and
- > to keep records required by law.

We will not keep your Personal Data for longer than necessary. Different retention periods apply for different types of Personal Data. Further details on this are set out in our Record-Keeping and Retention and Destruction Policy. Further information may be requested in this regard, please see '**How to contact us**' below.

When it is no longer necessary to keep your Personal Data, we will delete or anonymise it.

9. TRANSFERRING YOUR PERSONAL DATA ABROAD

To deliver services to you, it is sometimes necessary for us to share your Personal Data abroad, e.g.:

- > with our offices or entities or individuals within JTC Law or, where appropriate, the JTC Group;
- > with your and our service providers located abroad;
- > if you are based in another jurisdiction from where we are; or
- > where there is an international dimension to the services we are providing to you.

We transfer your Personal Data from the British Islands or European Union or the Cayman Islands where:

- > the recipient jurisdiction is a member of the European Union and/or the European Economic Area;
- > the recipient jurisdiction ensures an adequate level of data protection, as determined by the European Commission (and/or local data protection authority);

- > The recipient has agreed through contract to protect the data in accordance with appropriate data protection standards applicable to the data being transferred or we have obtained consent from you or the relevant person to the data being transferred; or
- > a specific exception applies under the Data Protection Laws.

These are explained below.

9.1 TRANSFERS WITH APPROPRIATE SAFEGUARDS

Where the European Commission or such other applicable data protection authority has not designated a non-EU Member State as 'adequate', we may transfer your Personal Data to such jurisdiction if we are satisfied the transfer complies with the Data Protection Laws, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

You may approach our DPGO to discuss accessing a copy of the relevant safeguards in the appropriate case.

9.2 ALTERNATIVE BASES

In the absence of an adequacy decision or appropriate safeguards, we may transfer Personal Data to a third country on an alternative basis under the Data Protection Laws, e.g.:

- > the transfer is necessary for a contract in your interests, between us and another person;
- > the transfer is necessary to establish, exercise or defend legal claims;
- > the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;
- > the transfer is in the public interest; or
- > you have explicitly consented to the proposed transfer after having been informed of the possible risks.

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms and are not otherwise prohibited. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your Personal Data on this ground.

9.3 TRANSFER JURISDICTIONS

We transfer Personal Data to the following jurisdictions depending on the needs of the client and the Processing:

- > EU Member States: including Luxembourg, the Netherlands, and the Republic of Ireland;
- > Adequate jurisdictions: including Guernsey, the Isle of Man, Jersey, New Zealand, Switzerland and the United Kingdom; and

- > Other jurisdictions: including the British Virgin Islands, Cayman Islands, Hong Kong, Malaysia (including Labuan), Mauritius, Panama, the Seychelles, Singapore, Switzerland, South Africa, United Arab Emirates, and the United States of America.

We may transfer to other jurisdictions on a bespoke or ad-hoc basis. If we do so, we shall transfer lawfully in accord with the above mechanisms.

9.4 FURTHER INFORMATION

If you would like further information about data transferred abroad, please contact our Data Protection Governance Officer (see '**How to contact us**' below).

10. YOUR RIGHTS

You may have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your Personal Data.
Rectification	The right to require us to correct any mistakes in your Personal Data.
Erasure (also known as the right to be forgotten)	The right to require us to delete your Personal Data— in certain situations.
Restriction of processing	The right to require us to restrict processing of your Personal Data in certain circumstances, eg if you contest the accuracy of the data.
To object	The right to object: —at any time to your Personal Data being processed for direct marketing (including profiling); and —in certain other situations to our continued processing of your Personal Data, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

Generally we will have up to four weeks to respond to your request, but in limited circumstances where a request is complex, this period can be extended by a further eight weeks. Typically the more targeted a request is, the quicker we will be able to assist you. If you chose not to provide any personal data or where any of the rights set out above are exercised

to limit the processing of personal data, we may be unable to provide the relevant services or there may be a restriction on the services we can provide.

11. KEEPING YOUR PERSONAL DATA SECURE

We have appropriate organisational and technical security measures to prevent Personal Data from being accidentally lost, or used or accessed unlawfully. We limit access to your Personal Data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable supervisory authority of a suspected data protection breach where we are legally required to do so.

12. HOW TO RAISE A CONCERN

We encourage you to contact us directly if you have any query or concern about our use of your Personal Data (see below 'How to contact us'). We hope we can resolve any issues you may have.

You can also complain to the data protection supervisory authority where you reside. You can ask us if unsure of their contact details.

13. CHANGES TO THIS PRIVACY NOTICE

This privacy notice was published on 13 January 2025 . We may update this privacy notice from time to time.

14. HOW TO CONTACT US

You can contact our DPGO by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under the Data Protection Laws or to make a complaint.

Our contact details are shown below:

OUR CONTACT DETAILS		OUR DPGO'S CONTACT DETAILS
Postal address: JTC Law PO Box 1075 JTC House 28 Esplanade St Helier JE4 2QP	Registered office: JTC Law JTC House 28 Esplanade St Helier JE2 3QA	Data Protection Governance Officer JTC Law JTC House 28 Esplanade St Helier JE2 3QA
+44 1534 700 000 info@jtc-law.com		+44 1534 700 000 info@jtc-law.com

Postal address: JTC Law (Cayman) LLP 94 Solaris Avenue 2 nd Floor Camana Bay PO Box 30745 Grand Cayman Cayman Islands KY1-1203 1 345 949 7212	Registered office: JTC Law (Cayman) LLP 94 Solaris Avenue 2 nd Floor Camana Bay PO Box 30745 Grand Cayman Cayman Islands KY1-1203 info@jtc-law.com	Data Protection Governance Officer JTC Law (Cayman) LLP 94 Solaris Avenue 2 nd Floor Camana Bay PO Box 30745 Grand Cayman Cayman Islands KY1-1203 1 345 949 7212 info@jtc-law.com
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Full details of JTC Law Group entities are included in the JTC Law Disclaimers which can be found on at www.jtcgroup.com/services/jtc-law/. In respect of any instruction with the JTC Law Group, the primary data controller will be the entity or individual issuing the engagement letter.

15. DO YOU NEED EXTRA HELP?

If you would like this notice in another format, please contact us (see ‘**How to contact us**’ above).