

Privacy Policy

May 2018

Privacy Policy

Protecting privacy is fundamental to the way the bridport Group, of which bridport & co (Jersey) Ltd and bridport & cie sa are part, does business. bridport is committed to safeguarding the personal information we collect and use about individuals and we will only process that information in accordance with all applicable laws.

This Policy applies to the following bridport entities:

bridport & cie sa	Place Longemalle 1, 1204 Geneva, Switzerland Bleicherweg 39, 8002 Zurich, Switzerland
bridport & co (Jersey) Ltd	6 Bond Street, St. Helier, Jersey, JE2 4WG, Channel Islands
Parkwell Limited	6 Bond Street, St. Helier, Jersey, JE2 4WG, Channel Islands

In this Policy, any reference to “bridport”, “we”, “us” or “our” includes each of the entities listed above. Any reference to “personal information” means any personal data or details from which you may be identified either alone or in conjunction with any other information we may have or be able to access either that you provide to us and/or we obtain from others within or outside the bridport Group.

This Privacy Policy does not apply to bridport’ use of personal information collected for any internal purposes such as staff administration. Any such use is covered in separate policies available internally within the bridport Group. It applies to all other processing of personal information by bridport.

This Privacy Policy sets out:

- what personal information we may collect and hold;
- the purposes for which your personal information may be collected, held, used and disclosed;
- how we collect and hold your personal information;
- how we protect your personal information;
- who we may share your personal information to (including overseas recipients);
- how you may access and correct your personal information; and
- how you can contact us.

1. The Personal Information We May Collect and Hold

bridport collects personal information that it believes is reasonably necessary for our primary business functions and/or activities. We generally only collect personal information in the course of working with you as someone associated with an existing or potential corporate or institutional client (e.g. an

owner, beneficial owner or their close family members in limited circumstances, a key contact, employee, director or representative); or

- engaging service providers and professional advisers of bridport.

Personal information we collect about you would typically include:

- Your name and contact details;
- Your role/position/title, your employer and your area of responsibility;
- If applicable, certain identifying information such as address, occupation and a copy of your identification document(s) (for example, your passport) as required by laws and regulations addressing anti-money laundering and related matters.

2. The Purposes for Which bridport Collects, Holds, Uses and Discloses Personal Information

We only collect, hold, use and disclose personal information about you for the purpose for which it was disclosed to us or purposes related to our primary business functions and/or activities which you would reasonably expect us to use it for without your permission.

In general, bridport collects, holds, uses and discloses personal information for the following essential and necessary purposes:

- complying with laws and regulations regarding anti-money laundering, anti-terrorist financing, financial abuse, fraud and any other criminal activity, including participating in internal and external investigations if any of these or any other suspicious activities are suspected;
- complying with any other legislative and regulatory requirements and requests to which we are subject;
- engaging service providers, contractors or suppliers relating to the operation of our business; and
- other primary business-related purposes such as accounts, record keeping and the potential transfer of business interests.

We also collect, hold, use and disclose your personal information for the following optional purposes, though if you do not agree to processing for these purposes then we may not be able to provide you or our corresponding client with our products and services:

- maintaining contact with our clients and other contacts;
- keeping our clients and contacts informed of our services, products and events; and
- providing financial products or services that have been requested.

3. How We Collect and Hold Your Personal Information

Whenever it is reasonable and practicable to do so, we will collect personal information about you when you provide it to us or it is provided to us with your authority (for example, by way of forms, face to face meetings, telephone calls, faxes, letters, email and other communications).

Occasionally we may collect your personal information from a third party, in particular from authorized, regulatory, public sources such as government regulators, industry self-governing bodies and other publicly available records. This will be most common when we are complying with our legal obligations regarding money laundering and other financial crime. If appropriate, in these circumstances we will either notify you of our sources or seek your consent to their use.

We generally hold personal information within paper or electronic files, including emails. This may also include electronic recordings of telephone calls where we are obliged by law or industry regulation to record such calls. We may in some circumstances store personal information with a third party data storage provider. Your personal information may also be held in a secure archiving facility. We will take reasonable steps to ensure that all personal information that we hold or is held on our behalf is protected from misuse and loss and from unauthorised access, modification and disclosure. Please refer to “How we protect your information” below.

bridport does not use any government-issued identifiers (such as national insurance numbers, tax file numbers or NRICs) as its own identifier.

4. How We Protect Your Personal Information

We have in place a number of technical and organization measures to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. These include but are not limited to:

- personal information is only accessible by limited, relevant members of staff, and all staff are bound by duties of confidentiality;
- all electronic information is held on systems that incorporate firewalls, password-controlled access and virus protection procedures;

We keep your information for no longer than is necessary for the purpose for which it was collected. When we no longer require your personal information, we will securely destroy and/or delete it from our systems as far as is reasonably and technically possible.

While we will always use our best efforts to protect your personal information, please be aware that we cannot guarantee its security, particularly if it is sent over the internet or through any other unsecure channel.

5. How We May Share Your Personal Information

bridport may from time to time disclose personal and sensitive information to:

- other bridport entities within the bridport Group, in which case your personal information will be collected, used, disclosed, managed and stored in accordance with this Privacy Policy or local privacy law, whichever has the highest standards of protection. bridport has offices in Jersey and Switzerland.
- third party service providers (for example, when we have outsourced certain functions to specialist providers). We will only provide such information as is necessary for the service provider to carry out their function and it will be subject to confidentiality clauses in the applicable services agreement, as well as other clauses reflecting our obligations to you as the controller of your personal information. These service providers may be located in

jurisdictions other than that in which your information was collected. When we transfer personal data to third parties in jurisdictions other than yours, bridport takes such steps as are reasonable in the circumstances to ensure that the third party does not breach this Privacy Policy or any and all applicable privacy laws. If there is any conflict between these various laws, the law with the highest standard shall prevail;

- excluding sensitive information and limited to your personal information only, to the financial services industry media and associations, for the purposes of networking and conference organisation and market surveys and awards;
- regulatory authorities in any jurisdiction in which bridport operates, upon their request; or
- as otherwise required by any applicable laws.

We may share your personal information in other ways if you have expressly consented in advance to that sharing.

We do not rent or sell your personal information to third parties.

6. Access to Personal Information

You have the right to request access to the personal information about you in bridports' possession and to request its correction. Subject to confirming your identity and any other requirements required by law, bridport will provide you with access to your personal information within a reasonable time frame and in accordance with the local applicable law. Under certain circumstances and where we are permitted to by the local applicable law, we may not provide you with access to certain information. If this occurs, we will explain why in writing to you when we respond to your request. If we deny your request for access on any basis, we will again explain the reasons for this decision in writing to you.

To request access please contact the Head of Compliance in the relevant jurisdiction who will coordinate your request. The contact details are set out in the "Contacting us" section below. bridport may charge the reasonable costs of providing you with access to your personal information, subject to any limit imposed by local law.

7. Correction of Personal Information

We endeavour to ensure that the personal information that we collect, hold, use or disclose is accurate, complete (in the context of the processing we carry out) and up-to-date. If you believe that any of your personal information that we hold is not accurate, complete or up-to-date, please contact us using the details below and provide us with supporting documents explaining how and/or why our records are incorrect.

If we agree that your personal information requires correcting we will take reasonable steps to do so. If we do not agree, we will provide you with the reasons for not correcting your personal information. We will keep a record of your request and our reasons for not agreeing with you.

8. Requests to Stop Processing

You are entitled to ask us at any time to stop processing your personal information, either entirely or specifically in relation to certain purposes such as marketing.

If you wish us to stop processing for specific purposes, for example if you wish to stop receiving any marketing e-mails or other communications from bridport, please contact us either on the details set out below or through your usual bridport contact and ask us to stop / not to send you any further material.

If you wish us to stop processing your personal data entirely, please contact us either using the details below or through your usual bridport contact. Please be aware that if you ask us to stop processing your information for the optional purposes, we may not be able to continue to assist you. For example, we would not be able to contact you about the products or services you or our corresponding client already receive from us, or we would not be able to send you information about other products, services, events or research.

We may not be able to stop processing your information where we are required to do so by law (for example, for financial crime-related purposes) or any other necessary purpose. However, if this is the case, we will write to you and explain this.

We will endeavour to respond to your request within a reasonable period of time from when we receive it.

9. Cookies

We may track and process information and data in relation to your use of our Website using “cookies”. A cookie is a small file which is sent to your browser and stored on your computer’s hard disc and helps us understand and track your use of the Website and where we can improve the information and services provided.

We use cookies solely to gather information on IP addresses and pages visited, to analyse trends, administer the Website, track users’ movements on the Website and gather broad demographic information for aggregate use. For example, we may record your device information including hardware and software used, general location, when and how you interact with our Website and your registration and log-in activity when you use the Website and related online platforms. IP addresses are not linked to other personally identifiable information and will not be used to deliver targeted marketing messages.

We only share this information with bridport’s officers, employees and third-party contractors. Where we use or share information from or with third parties, we will respect any permissions that you have set about how you would like your information to be used.

Most internet browsers allow you to stop receiving cookies via options/settings. You may enable these options/settings. However, this will mean that our system may not recognise your computer when you log in and so you may not be able to use or access certain parts of the Website.

10. Links to Other Websites

This Website may contain links to other websites. This Privacy Policy extends only to our Website and does not cover your use of, provision of data to and collection of data on any website not connected to us which you may link to by using hypertext links within the Website.

We recommend that you check the privacy policy of each website that you visit before submitting any personal information and contact the owner or operator of that website if you have any concerns.

11. Changes to the Privacy Policy

We may edit or amend this Privacy Policy from time to time. If we make any substantial changes to this policy, we will notify you by using a prominent notice on the home page of our Website.

From time to time we may make improvements or changes to our services, or there may be amendments to laws or regulation or developments in the technology or processes we use. If we intend to make any significant changes to the use of your personal information in a manner different to that stated at the time of collection, we will notify you by posting a notice on our Website.

12. Contacting Us

If you would like more information about how we manage your personal information or to request access to or correction of your personal information as processed, please contact:

In Jersey

Head of Compliance
bridport & co (Jersey) Ltd
6 Bond Street
St. Helier
Jersey
JE2 3NP
Channel Islands

Compliance@bridportjersey.net

In Switzerland

Head of Compliance
bridport & cie SA
Place Longemalle 1
1204 Geneva
Switzerland

Compliance@bridport.ch

13. Complaints

If you wish to raise any concerns about a breach or potential breach of your privacy, please contact the Head of Compliance in writing on the details set out above. We will make every effort to resolve your complaint internally and within a reasonable timeframe, escalating it where appropriate. We will inform you of the outcome of our resolution of your complaint.

If you are not satisfied with the outcome of your complaint, you may be able to lodge a complaint with your local Privacy regulator. Each regulator may have a different process for lodging complaints and we encourage you to contact your local regulator first to check this. We have set out the contact details for the Privacy regulators in the jurisdictions which this Privacy Policy covers below:

In Jersey

The Office of the Information Commissioner
Brunel House
Old Street
St Helier
Jersey JE2 3RG

In Switzerland

Federal data protection & Information Commissioner
Feldeggweg 1
CH - 3003 Bern
Switzerland

bridport & co