

## **AMI Financial Products Limited - GLOBAL PRIVACY NOTICE FOR CORPORATE CLIENT**

The privacy and security of our clients' data is of critical importance to us. This global privacy notice explains how we collect, manage and protect your personal data if you are an officer or employee of one of our corporate/institutional clients. It also sets out your rights as a data subject.

### **Who we are**

AMI has established itself as one of the most forward thinking & innovative financial services distribution companies in the market, this has been achieved by actively seeking out growth opportunities coupled with continuous product development. Our rapid expansion is built upon a core range of principals that include a primary focus on risk, liquidity & underlying investment mandate as with all investments it is essential to understand the risk & the opportunity. Our culture is one of ambition & progression whilst we focus on delivering a high level of service with proven results. AMI has access to a wealth of expertise both in house & through utilising the resources of the group of companies which make up our carefully selected product range.

### **Data we collect and hold about you**

We collect and process your data for various purposes connected with our services, including, for instance, data we require to manage our provision of services to you or your employer and to meet our partners legal and regulatory obligations.

What personal data we collect and for what purpose will depend on the nature of our relationship with you. For instance, if you are a director of private corporate client, then we may need to collect detailed information for due diligence and regulatory purposes.

The types of data we may collect, and process includes: Name and Contact Details: Information we require for the purposes of managing our relationship, generally including your name, job title, postal addresses, country of residence, email addresses and telephone numbers.

Due Diligence & Regulatory Details: Information we require from directors of private corporate clients to meet our legal and regulatory obligations, particularly anti-money laundering legislation, and assess the risk associated with providing services to you, including:

- Identity information including your current and former names, aliases, date of birth, country of birth, place of birth, gender, nationality and a copy of your valid passport and/or birth certificate (including issue date and expiry date, where applicable).
- Documents providing proof of your identity and address, such as copies of government issued documents, bank statements, utility bills and similar documents.
- Detailed tax status information including your tax domicile, tax identification number, copies of tax returns and tax advice received.
- Proof of the source of your wealth and funds, such as pension plans, property sales agreements and loan documents.
- Occupation and employment information, including details of legal entities you are employed by or affiliated with.
- Details of criminal convictions and disqualifications, history of bankruptcy and details of investigations by a formal official body and/or if you are named on a sanctions list.
- Details of involvement in high-risk or high-profile activities.
- Other due diligence information gathered from checking tools we use and from searching information in the public domain.
- Share Plan Details: If you participate in an employee share plan which we administer on behalf of your employer, then we will collect information such as the number of shares that you own and their value at any point of time

Other information: Additional information you provide to us or created by us when providing services to you

The types of data we collect may include sensitive personal data.

We collect personal data when you give it to us and from information we learn about you through our relationship. We also collect data about you from third parties, including your employer, your professional advisers, due diligence and risk assessment screening service providers and from the public domain, including from internet searches.

Purposes for which we use the data and the legal basis for doing so. When providing services to you, we may use data about you for the following purposes and on the following lawful bases:

#### **PURPOSE LAWFUL BASIS FOR PROCESSING**

Carrying out due diligence on directors of private corporate clients and performing risk Including carrying out standard due diligence checks, enhanced due diligence checks, politically exposed person checks and performing risk assessments in relation to your financial standing and eligibility for our services.

- Necessary to comply with legal obligations to which we are subject.
- Our legitimate business interest to assess the risk associated with providing you with our services.
- When processing sensitive personal data, we do so with your explicit consent.

#### **PURPOSE LAWFUL BASIS FOR PROCESSING**

Legal & regulatory compliance and compliance with law enforcement requests.

Including performing checks and monitoring transactions for the purpose of preventing and detecting crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. Also, sharing information on suspected financial crimes, fraud and threats with law enforcement and regulatory bodies.

- Necessary to comply with legal obligations to which we are subject.
- When processing sensitive personal data, we do so with your explicit consent.

To provide services to you or your employer.

Including share option plan services and all other services we provide to you.

Our legitimate business interests to provide you with share plan and other services at the request of your employer.

Internal management, administrative and organisational purposes.

This includes maintaining internal records and carrying out other business administration tasks.

- Our legitimate business interest to process your personal data in order to manage our business processes.
- Statistics and other data analysis. This includes creating forecasts and business plans, improving our services and developing new services.
- Our legitimate business interest to process your personal data to develop and improve our business through aggregated and anonymised reporting and analysis.

Sharing data with entities in our group. Including sharing client records and results of due diligence exercises with our global entities.

- Our legitimate business interest to identify and develop shared clients across our group and the jurisdictions in which we operate and to utilise existing due diligence and risk assessment.

Sharing data with other third parties. Including third parties who process personal data on our behalf.

Our legitimate business interest to share your data with trusted third parties who provide us with services relevant to our provision of services to you, including professional advisers, screening service providers and IT service providers.

Where we do not base our use of personal data about you on one of the above legal bases, we will ask for your consent before we process the personal data (these cases will be clear from the context).

In some instances, we may use personal data about you in ways that are not described above. Where this is the case, we will provide a supplemental privacy notice that explains such use. You should read any supplemental notice in conjunction with this notice. To the extent that we rely upon consent as the legal basis under which we use your data, then you are permitted to withdraw your consent at any time.

### **Sharing your data**

We may share your data with:

- Other entities in our group. We do this because we are an international organisation and work with clients across multiple jurisdictions. Sharing client records and the results of due diligence and risk assessments enables us to provide our services more efficiently and develop our relationship with you. Access to shared data is limited only to personnel who need access to carry out their assigned duties.
- Third parties who process data on our behalf to provide us or you with products or services for the purposes outlined above. These third parties include:
  - Professional advisers: Including lawyers and tax advisers.
  - Screening service providers: Including due diligence and financial crime screening database providers, such as Thompson Reuters World-Check.
  - IT service providers: Including hosting and cloud service providers, such as Microsoft.
  - Other suppliers and providers of services to us: Including banks, our sub-contractors and agents.
  - Other third parties, where required or permitted by law, for example:
    - Regulatory authorities.
    - Government departments.
    - In response to a request from law enforcement authorities or other government officials.
    - When we consider disclosure to be necessary or appropriate to prevent physical harm of financial loss or in connection with an investigation of suspected or actual illegal purpose.
  - In the context of organisational restructuring.

## **Transferring your data overseas**

When sharing data about you with other entities in our group, or if it is necessary to provide you with our services, your data will be transferred outside the country or territory in which it was collected. If your data is collected within the European Economic Area ('EEA'), this means that your data may be transferred outside of it, including to a country or organisation that may not have data protection standards equivalent to those in the EEA. If your data is collected outside of the EEA, this means that your data may be transferred into it.

Where we transfer personal data to countries outside the EEA, we will only do so where:

- The country or organisation we are transferring your data to is recognised by the European Commission as providing adequate data protection standards; or

We have implemented appropriate safeguards to ensure the protection of your personal data, such as standard data protection clauses adopted by the European Commission.

## **How long we keep your data**

The period for which we may retain your data is generally short, however our counterparts may retain data for up to five years depending on the purposes for which the data was collected, whether you have requested the deletion of the data, and whether any legal obligations require the retention of the data (for example, for regulatory compliance). We will not retain data about you for longer than is necessary to fulfil the purposes for which the data was collected.

## **How we protect your data**

We implement appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction.

## **Your rights and options**

Depending on where you are resident, you may have some or all of the following rights under applicable data protection laws in respect of your data that we hold:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.

Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you can object to us doing so and opt out of all future marketing. You can ask us to restrict the use of your personal data if:

- It is not accurate.
- It has been used unlawfully but you do not want us to delete it.
- We no longer need it.
- If you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
- In some circumstances you can compel us to remove your personal data.

You can also lodge a complaint with the national data protection authority in an EU member state of your habitual residence, place of work or place of an alleged infringement. You can find the contact details for the national data protection authorities at this link, [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

#### Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify you of the changes where required by applicable law to do so. Last modified October 2018