



DATA PROTECTION NOTICE

Griffin Trust Group

Protecting the privacy of Related Parties¹ is very important to us. In the following, we outline the basis on which we collect and process personal data, for what purposes we use and disclose your personal data and your rights in respect of your personal data.

The basis for processing personal data

In order to be able to provide our Services² and in order to adhere to our legal obligations in accordance with the Liechtenstein Due Diligence Act and Ordinance (“DDA” and “DDO”) and to protect our legitimate interests, we, the Griffin Trust Group³, process personal data that we obtain from our Related Parties.

In doing so, as a responsible organisation, we comply with the European General Data Protection Regulation (“GDPR”⁴) and the Liechtenstein Data Protection Act.

What personal data we process

Relevant personal data that we process includes personal information such as name, address and other contact details, date and place of birth, and nationality, identification data (e.g. ID card and passport details), authentication data (e.g. signatures), bank account details, information obtained from worldcheck as well as information concerning your occupation, income and source of wealth, if applicable by law).

To the extent necessary to meet our obligations under the GDPR, the DDA and the DDO and to provide our Services, we may obtain further information from publicly available sources, (e.g. registers, commercial and association registers, press, internet).

How we collect personal data

Personal data that we process is obtained from various sources, including but not limited to:

- Information you provide to us from time to time;
- Information about you provided to us by the contracting party acting on your behalf (e.g. your company or an intermediary);
- When you communicate with us by telephone, fax, email or other forms of electronic communication ;
- Our client on-boarding forms;
- Other companies in the Griffin Trust Group;
- Your agents, advisers, intermediaries, and custodians of your assets;

¹ “Related Parties” means: Contracting Partners, Founders of Foundations, Institutions and Companies, Settors and Protectors of Trusts and Beneficiaries, Directors of Mandates, Persons who exercise control over companies that we administer, advisors, amongst others

² “Services” means a) company formation, management, administration, (b) provision of registered agent services, company secretarial services, nominee directors or shareholders, (c) bank or brokerage introductions, (d) trustee, board of foundation, advisory and other related services provided by Griffin Trust to Related Parties.

³ “Griffin Trust Group” means: Griffin Trust AG, Griffin Trust Services AG and GTAG Solutions FZE

⁴ Further information in this regard can be found here: <https://www.eugdpr.org/>



- To the extent necessary to meet our obligations under the GDPR, the DDA and the DDO and to provide our Services, we may obtain further information from publicly available sources, (e.g. registers, commercial and association registers, debt directories, press, internet).

How we protect personal data

We protect your personal data through appropriate technical and organizational security measures and store them electronically on secure servers and physically in secure premises.

Who we disclose or transfer personal data to

Please note that we will not transfer any data to a third party unless required by law (e.g. under the Common Reporting Standards) or required in the course of providing our Services to you (e.g. providing information to advisors, banks and lawyers, amongst others in order to facilitate transactions that we are undertaking on your behalf or enable them to comply with their own due diligence laws).

How long we store personal data

Any data that we hold about you will be stored as long as our relationship exists and thereafter for further 10 years.

What your rights are in respect of personal data

We would like to inform you that under the new GDPR, you have the following rights:

- the right to **access** according to Article 15 of the GDPR,
- the right to **rectification** according to Article 16 of the GDPR,
- the right to **erasure** according to Article 17 of the GDPR, the right to **restrict processing** according to Article 18 of the GDPR, the right of **object** according to Article 21 of the GDPR,
- if applicable – the right to **data portability** according to Article 20 of the GDPR.
- You may at any time lodge a complaint with the responsible data protection authority under Article 77 of the GDPR. More information in this regard can be found here:

<https://www.llv.li/#/1758/datenschutzstelle>

The above rights may be subject to special laws in Liechtenstein (such as the DDA and the DDO) and we may be entitled to refuse requests where exceptions apply.

Our Data Protection Officer

Should you wish to exercise any of your rights or withdraw any consent that you have granted or will grant to us, please contact our Data Protection Officer at:

Griffin Trust AG
C/o Compliance
Email: dataprotection@griffin.li
Tel : +423 237 69 00

Effective Date: 25th May 2018