

OUR PRIVACY NOTICE

Introduction

This notice describes how JAR Geneva S.A. collects personal data from you during our business and how we then use that information in order to provide you with services. We will detail the reasons we process your data, how it is stored and what your rights are in respect of your dealings with JAR.

What is GDPR?

The General Data Protection Regulation (GDPR) replaces the current data protection legislation on 25 May 2018 and the changes are driven by the goal of providing individuals with more control over their data and how they allow companies to use it. New rights have been introduced to assist individuals and greater obligations have been placed on companies to fulfil before they can process someone's personal data.

Who we are and what we do

JAR Geneva S.A. is a Wealth Management boutique which is headquartered at 14 rue du Rhône, 1204 Geneva, Switzerland, Tel: 71 10 900 22 41*

We are independent advisers providing a comprehensive range of tailored investment services for our clients as well as acting as portfolio managers for several funds. The JAR group includes offices in London, Dubai, Geneva and Gibraltar.

Your Data Privacy

JAR is a data controller registered with the Information Commissions Office (ICO) which can be seen here: <https://ico.org.uk/ESDWebPages/Entry/ZA205316>. We are responsible for the accurate processing of your data and ensuring that it is secure. We are committed to protecting the rights of individuals with whom we interact and in line with the data protection regulations.

This privacy notice was last updated in May 2018 to bring it in line with the requirements of GDPR. It may be amended from time to time to reflect the changes in the law or the services which JAR offers.

You can contact JAR at any time by emailing us on contac@jargeneva.com or calling the above number.

What information we may collect about you

We process personal information to enable us to provide financial services and advice, maintain our own accounts and records and in certain instances to promote our services. For this reason, the information processed may include:

- Personal and Contact – Name, date of birth, gender, national identifier such as passport number or National tax identifier, where you live and how to contact you.
- Socio-Demographic – Details about your work and profession, your nationality and your lifestyle including relevant expenditure.
- Sensitive data – from time to time there may be a need to capture your sensitive data which are things such as information on your physical or mental health or any criminal convictions. This is to help us understand your financial needs in respect of future planning and insurance requirements as well as meeting our regulatory obligations. There is special treatment under the law for this type of data and we will only use it where it is necessary and the law allows.
- Contractual – Details required in order to enter into a contract or provide services to you or on your behalf.
- Financial – we will capture as much information about your finances and investments as is necessary in order for us to act for you. This will include details of assets and liabilities, income, pensions, investment experience, employment history along with your attitude to risk and any other information which may be required.
- Communications – during the course of our correspondence with you we will also learn further information about you and this personal data may also be used to enhance the services we offer you.
- Who we collect information on – The information detailed above may be about you personally as well as you family and associates and suppliers and enquirers.
- Consents – Any consents or preferences that you give us will be related to you alone. This includes your contact preferences and the marketing communications you want to receive from us.

How we collect your personal information

We may collect your personal information from the following sources:

When you provide us with Data directly:

- During the account opening process, we will complete a number of forms to allow us to build a picture of you and your needs
- When you talk to us on the phone
- In emails and letters
- In customer surveys
- During annual reviews where we update your information and details

Data we collect when you use our services:

- Payment and bank details when you provide them to us. Including when we are involved in setting up any accounts you instruct us to with external parties including custodians.
- Transactional data
- Profile and usage data. We may gather data from devices you use to connect to our services using cookies and other internet tracking software

Data from third parties we work with:

- Companies or individuals that introduce you to us
- Information service providers – we are required to undertake screening against negative media, PEP and sanctions lists as part of client due diligence. For that JAR use online tools which may provide us with personal data.
- Other professional bodies
- Regulators and Law enforcement agencies • Public information sources including Companies House and other business/directorship searches.

How we use your personal information

We may use personal information to:

- Administer and manage your account with JAR
- Provide you with appropriate services and advice
- Carry out your instructions in relation to your account and on your behalf with custodians and investment houses.
- Invoice and take payments
- Fulfil our regulatory obligations
- Communicate with you

Our Legal bases for using your personal data

In order to process your data it has to be necessary to our purpose as well as meeting a legal reason for doing so. There are a number of legal bases that can apply and for our relationship with you we will process your data for one of the following reasons:

1. Where contractually it is needed to provide you with our services or products
2. To comply with our legal obligations including regulatory requirements
3. Where it is in our legitimate interests to do so
4. With your consent

In the main we will rely on our contractual relationship or the legal obligations placed on JAR to correctly process your data in order to adhere to our regulatory requirements. This can include complying with the Money Laundering, Terrorist Financing and Transfer of Fund Regulations 2017 or when we determine whether a product is suitability for your needs and where we categorise you as a particular type of client under the FCA's rules.

Sharing your information

At all times we will respect your wishes regarding sharing any of your personal data. There may be instances where it is necessary for JAR to share your information in order to provide you with a product or service or to fulfil a legal obligation. As such your information could be shared with members of the JAR group in the course of managing your account and providing you with a service. During the course of our activities we may also be required to share your information with regulators, professional advisers and consultants, service providers, credit reference agencies and business associates as well as companies that introduce you to us and companies you ask us to share your data.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of JAR Geneva S.A. our customers, or others we will only do so to the extent that is required to fulfil our obligation. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

International Data Transfers

We operate internationally and may transfer information to countries outside the European Economic Area (EEA) for the purposes described in this policy. For example, we deal with a number of custodians in other jurisdictions including Switzerland and as such would be required to share your details with them during the account opening process and on an ongoing basis.

We rely on multiple legal bases to lawfully transfer personal information internationally. These include your consent, compliance with a legal duty, and European Commission approved model contractual clauses which require certain privacy and security protections from specific jurisdictions.

Where we store and process your personal data

The data that we collect from you will generally be stored inside the EEA. In the course of our business and dependent on the third party suppliers we chose there may be cause for your data to be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). In these instances, there may also be reason for it to be processed by staff operating outside the EEA who work for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. JAR Capital will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. You should be aware that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of all data transmitted; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features with a view to preventing unauthorized access. How long we keep your personal information We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a data retention policy and run data routines to remove data that we no longer have a legitimate business interest in maintaining. For regulatory purposes we are required to retain client data for up to a period of 7 years following the end of that business relationship. If your information is no longer required for us to process for our business relationship with you we will where possible delete that information. However, where we are legally required to store the information for a longer period then access to your information will be restricted to select individuals within our firm and will only be handled for specific purposes in line with our privacy policy.

Marketing

During our relationship we will collect and update data with which we are able to contact you. In the main we will utilize a postal or email address of your preference. These details, which you have provided to JAR, will be used in respect of the operation of your account including sending you service notifications and respond to you when you contact us.

In addition we may also use your information to promote new features or products that we think you would be interested in. Where you are investor or potential investor in one of our funds and have signed up to our distribution group we will send you regular material on the performance of said funds along with other updates we believe are relevant for your needs. You can control the marketing communications you receive or opt out entirely at any times.

Your rights

The implementation of GDPR brings with it additional rights for data subjects which are outlined below. You have the right to:

- Request access to the personal information a company holds on you.
- Request correction of the personal information that we hold about you. If you believe that there are inaccuracies in the information we hold this right enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information, also known as the right to be forgotten. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). Please note that if there is a legal basis for which we are required to retain your information then we may not be able to enact your right to erasure. We will of course advise you of any such instance at the time of request.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. If you object to your information being processed by JAR Capital or a third party we may no longer be able to act

for you.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request to move, copy or transfer your personal information to another party in certain formats, if practicable.
- Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

How to get a copy of your information

The GDPR gives you the right to access information held about you by any company. We also encourage you to contact us to ensure your data is accurate and complete. You may request a copy of your personal information at no cost. This is often referred to as a subject access request.

Any request for detail of the information we hold on you should be sent to data@jarcapital.com or to our postal address:

Subject Access Request JAR Geneva S.A. 14 rue du Rhône, 1204 Geneva, Switzerland, Tel: 71 10 900 22 41+

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to contact@jargeneva.com.