

Privacy Notice

1. INTRODUCTION

This Privacy Notice sets out the basis on which the Panama Private Interest Foundation (“Foundation”, “we”, “our”, “us”) provides information about how the Foundation collects and processes the personal data of our clients and individuals (“you”, “your”) who interact with us via our website www.digitalsuccessionplan.com (the “Website”), purchase or use our services, and to all subsequent correspondence or communications with those people, whether by email, telephone or otherwise.

2. WHO WE ARE AND WHAT WE DO

The Foundation specialise in providing succession planning services to our clients and our expertise includes investments, and estate planning advice.

The Foundation is a “controller” of your personal data. This means that we are responsible for deciding the purposes and means by which we use the personal data we hold about you. “Personal data” is any information by which you or any living person can be individually identified either directly or indirectly but does not include anonymised data. There are “special categories” of more sensitive personal data which require a higher level of protection.

The personal data the Foundation collects about you will depend on the services you use and our relationship with you. Where you provide information about other people (such as a spouse, civil partner, dependant and/or child) you are responsible for ensuring that they know we are processing their personal data in accordance with this Privacy Notice.

If you are located in the European Union, we, as a controller, are obliged to provide this Privacy Notice to you under applicable data protection laws including General Data Protection Regulation (EU) 2016/679. In brief this Privacy Notice explains:

- what personal data of yours we hold and why we process it;
- the legal grounds that allow us to process your personal data;
- where we obtain your personal data, who gets to see it and how long we keep it;
- your data protection rights; and
- where to address queries or complaints.

This Privacy Notice does not form part of any contract, or offer to enter into a contract, with us. It may be amended by us at any time. We reserve the right to amend this Privacy Notice at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice on the Website. We recommend that you check the Website often, referring to the date of the last modification listed at the top.

It is important that you read this Privacy Notice so that you are aware of how and why we are using your personal data. Please see Section 14 (Your Data Protection Rights) and Section 16 (Contact Details) for further information about how to contact us, your rights and how to exercise those rights.

3. WHO DOES THIS PRIVACY NOTICE APPLY TO

This Privacy Notice applies to you if you are a client of the Foundation or if you share personal data with us when you access, browse and use our Website (through various domains) and interact with us on our Website.

4. WHAT PERSONAL DATA THE FOUNDATION COLLECTS ABOUT YOU

The Foundation may collect, use, store and transfer different categories of personal data about you which we have grouped together as follows:

DESCRIPTION	TYPE OF PERSONAL DATA
IDENTITY DATA	• Name and title • Date of birth • Gender • Marital/ civil status • Tax number • Passport/Driver's Licence • Utility bill • Banking Reference
BENEFICIARIES DATA	• Address • Phone numbers • Email addresses
BENEFICIARIES DATA	Details of: • Spouse / Civil Partner / Partner • Next of kin • Dependants • Designated beneficiaries
FINANCIAL DATA	• Tax status • Tax number • Bank account details • Overall wealth situation • Salary and remuneration • Investment income • Pension information • Credit history including court judgments and any other information necessary for processing and collecting payments and fraud prevention.

DESCRIPTION	TYPE OF PERSONAL DATA
MARKETING DATA	Your preferences in receiving marketing communications from us.
COMMUNICATIONS DATA	Your interactions with us and any complaints or feedback
TECHNICAL DATA	• Internet protocol (IP) address • Your login data • Browser type and version • Location • Browser plug-in types and versions • Operating system and platform and other technology on the devices you use to access this.
USAGE DATA	Information about how you use the Website and our services.

SPECIAL CATEGORIES OF PERSONAL DATA

We may also receive and process special categories of personal data about you:

SPECIAL CATEGORIES OF PERSONAL DATA are personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership; genetic data; biometric data for the purpose of uniquely identifying an individual or data concerning health or sexual orientation.

We limit the collection of special categories of personal data from you. Typically, we will process Health Data where it is necessary and proportionate for the purposes of advising you or to comply with a legal obligation to which we are subject.

5. HOW THE FOUNDATION COLLECTS YOUR PERSONAL DATA

The Foundation may receive your personal data through various means including:

- Direct interactions

We obtain your Identity Data, Contact Data, Proof of Identity, Beneficiaries Data and Financial Data through your interactions with us including when (a) you meet with us (in person or remotely) to discuss proposed or actual services or other service-related matters; (b) we communicate by post, email, telephone, SMS, video conference or by any other means; and (c) you furnish us, or our service providers, forms, documents, contracts and other materials containing your personal data.

We collect Communications Data, Technical Data and Usage Data when you interact with us through the Website (including when these are accessed from mobile devices and by phone) or otherwise.

We collect your Marketing Data when you indicate to us your preferences for receiving marketing communications from us.

- **Automated technologies**

As you browse and interact with the Website, we collect browser data. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Policy for further details.

- **Third party sources**

We may receive personal data about you from third parties. For example, we may receive personal data about you from Technical Data from Google Analytics to better understand the use of our Website. These features use cookies and anonymous identifiers to collect information.

6. THE LEGAL BASES TO PROCESS YOUR PERSONAL DATA

The legal bases the Foundation may rely on to process your personal data are:

- Consent where you have provided freely given, specific, informed and unambiguous consent to the processing of your personal data.
- Contractual Necessity where processing your personal data is necessary for our performance of a contract with you or to take steps at your request to enter a contract.
- Legal Obligation where processing your personal data is necessary for compliance with our legal obligation.
- Legitimate Interests where processing your personal data is necessary for our or a third party's legitimate interests. We have a legitimate interest in carrying on, managing and administering our business. Part of our business management involves processing your personal data. However, your personal data will not be processed for our legitimate purposes if doing so would override your fundamental rights and freedoms which require protection of your personal data.

7. WHY THE FOUNDATION PROCESSES YOUR PERSONAL DATA

Set out below is a description of the ways the Foundation typically processes your personal data and the legal reasons the Foundation relies on to do so.

(i) Website and the Foundation's services

PURPOSE/ ACTIVITY	TYPE OF DATA	GROUNDS FOR PROCESSING
To administer and protect our business, services, our Website, and property hosted on or made available through the Website including implementing and monitoring security measures and access authentication controls; troubleshooting; data and usage analysis; testing; system maintenance; user support; and to use the outcome of support services to improve and protect our services, networks and systems. To anonymize personal data for statistical purposes, and to pseudonym passwords for security purposes.	• Contact Data • Technical Data • Usage Data	• Necessary for the performance of a contract with you. • Necessary to comply with a legal obligation. • Necessary for our legitimate interests for running our business; network and systems security; to identify and/or prevent unlawful activity or other misconduct; manage disputes and to protect our interests; collate statistical information to enhance our services and business.
To use data analytic and other technologies to monitor usage of our Website, measure the performance of the Website and to optimise them, improve our services, marketing strategy and output, user interactions, relationships and experiences. We may also process information collected when you browse and use our Website to set default options for you (such as language and country).	• Technical Data • Usage Data	To use data analytics and other technologies to monitor usage of our Website, measure the performance of the Website and to optimise them, improve our services, marketing strategy and output, user interactions, relationships and experiences. We may also process information collected when you browse and use our Website to set default options for you (such as language and country).

(ii) The services provided by the Foundation

PURPOSE/ ACTIVITY	TYPE OF DATA	GROUNDS FOR PROCESSING
To advise you on and establish your eligibility for our products and services.	• Identity Data • Contact Data • Beneficiaries Data • Financial Data • Health Data	• Necessary for the performance of a contract with you. • Necessary to comply with a legal obligation.
To process your application for our products and services.	• Identity Data • Contact Data • Beneficiaries Data • Financial Data • Health Data	• Necessary for the performance of a contract with you. • Necessary to comply with a legal obligation.
To manage and administer the benefits and related services to beneficiaries.	• Identity Data • Contact Data • Beneficiaries Data • Financial Data • Health Data	• Necessary for the performance of a contract with you. • Necessary to comply with a legal obligation.

(iii) General business interactions

PURPOSE/ ACTIVITY	TYPE OF DATA	GROUNDS FOR PROCESSING
To manage our relationships including to: (i) respond to communications; (ii) schedule, prepare for and attend meetings (in person and remotely);	• Identity Data • Contact Data • Financial Data	• Necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract.

(iii) manage, administer and take decisions regarding the on-boarding of our clients; (iv) provide, manage and administer our services and our relationship with our client including accounting, auditing, operational and taking other steps linked to the performance of our business relationship; (v) carry out our obligations under and arising from any agreements you and any product provider; (vi) manage, collect and pursue monies owed to us; (vii) notifying changes to Privacy Notice and to administer data protection, privacy and other rights.		• Necessary to comply with a legal obligation. • Necessary for our legitimate interests for responding to communications, attracting new clients and business, running our business, on-boarding our client, providing our services, providing service information and keeping records.
Conducting or exploring any re-organisation of some or all of our business and assets, merger or acquisition or other corporate deal.	• Contact Data • Financial Data	Necessary for our legitimate interests to run our business, expand or otherwise restructure our business and assets; make corporate decisions, negotiate and enter into corporate transactions.
To deal with and manage complaints, claims and legal disputes involving our client, you and/or others; to identify and/or prevent fraud or other breaches of laws; conduct or assist with internal, government, regulatory, law enforcement and other investigations, inquiries or actions; comply with our insurance policies and to exercise or defend our legal rights or to comply with court orders or orders by applicable regulators.	• Identity Data • Contact Data • Financial Data • Technical Data • Usage Data	• Necessary for the performance of a contract with you. • Necessary to comply with a legal obligation. • Necessary for the purposes of obtaining legal advice or for the purposes of, or in connection with, legal claims, prospective legal claims, legal proceedings or prospective legal proceedings, or is otherwise necessary for the purposes of establishing, exercising or defending legal rights.

		• Necessary for our legitimate interests of managing our business including complying with our policies of insurance and complying with or cooperating with any regulatory requirement or matter.
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We will only use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. AUTOMATED PROCESSING

The Foundation does not take automated decisions about you using your personal data or use profiling in relation to you.

9. THIRD PARTY INFORMATION

Other individuals' personal data

Where you provide us with personal data relating to other people, you represent and warrant that you will only do so in accordance with applicable law. You will ensure that before doing so, the individuals in question are made aware of the fact that we will hold information relating to them and that we may use it for any of the purposes set out in this Privacy Notice and where necessary you will obtain their consent to our use of their information. You will provide anyone that you provide us with personal data about with a copy of this Privacy Notice. We may notify those individuals that you have provided their details to us.

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10. DISCLOSURE OF YOUR PERSONAL DATA

We reserve the right to disclose your personal data to third parties:
if we are under any legal or regulatory duty to do so; and
to protect our rights or the safety of us, our personnel, users or others.

The Foundation may disclose your personal data for the purposes listed in Section 7 of this Privacy Notice (**Why the Foundation Processes Your Personal Data**) to the categories of recipients described in this Section 10 (**Disclosure of Your Personal Data**).

The Foundation requires its discloses to keep your personal data confidential and secure and to protect it in accordance with the law. They are only permitted to process your personal data for the lawful purpose for which it has been shared and in accordance with our instructions.

- **Service providers.** The Foundation uses third party service providers to hold and use personal data on our behalf in order to provide us with a service.
- **Advisors.** The Foundation may also disclose personal data to our professional advisors and experts in order to obtain their assistance in carrying out our services and our activities. We require these parties to keep your personal data confidential and secure and to protect it in accordance with the law. They are only permitted to process your personal data for the lawful purpose for which it has been shared and where a service provider uses your personal data as our processor, only in accordance with our instructions.
- **Public and Government Authorities.** Entities that regulate or have jurisdiction over us. We will disclose personal data in order to comply with any legal obligation, if we are ordered to do so by a court of competent jurisdiction, law enforcement, regulatory or administrative authorities. We may also do so where we consider it necessary in order to enforce our legal notices and agreements we may have with you, and/or to protect the rights, property and/or safety of our personnel, agents and others.

11. TRANSFERS OF YOUR PERSONAL DATA

In connection with our business and for administrative, management and legal purposes, we may transfer your personal data to jurisdictions outside of the European Economic Area. Where we need to transfer your personal data, we shall ensure that the transfer is lawful and that there are appropriate security arrangements in place.

12. SECURITY OF YOUR PERSONAL DATA

The Foundation is committed to maintaining the security of your personal data it processes. We maintain appropriate physical, procedural, organisational and technical security measures intended to prevent loss, misuse, unauthorised access, disclosure, or modification of your personal data under our control. We also limit access to your personal data within our organisation and to third parties that need access to your

information in providing services to us. They will only process your personal data on our instructions and are required to protect personal data. If you have reason to believe that your personal data is no longer secure, please notify us immediately using the contact information supplied in Section 16 (Contact Details).

13. RETENTION OF YOUR PERSONAL DATA

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

14. YOUR DATA PROTECTION RIGHTS

If you are based in the European Union, you have various rights under applicable data protection laws, subject to certain exemptions, in connection with our processing of your personal data, including those set out in the table below.

RIGHT	EXPLANATION
ACCESS AND INFORMATION	You are entitled to receive, on request and free of charge, a copy of all your personal data that we hold together with other information about the processing of that personal data. There are some limitations to this right. For example, if the personal data also relates to another person and we do not have that person's consent, or if the personal data is subject to legal privilege. Where there is data that we cannot disclose, we will explain this to you.
RECTIFICATION OF YOUR PERSONAL DATA	You may request to have inaccurate or incomplete information corrected and updated by us.
ERASURE OF YOUR PERSONAL DATA	This right enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing. However, where we hold and process your personal data in order to comply with legal obligations, such as compliance with tax, or for the establishment exercise or defence of legal claims, your right to ask us to delete or remove your personal data is limited.

RIGHT	EXPLANATION
OBJECT TO PROCESSING	You may object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) in order to justify the basis for our processing your personal data and there is something about your particular situation which makes you wish to object to processing on this ground.
REQUEST RESTRICTION OF PROCESSING OF YOUR PERSONAL DATA	This right enables you to ask us to suspend the processing of your personal data (e.g. if you want us to establish its accuracy or the reason for processing it).
DATA PORTABILITY	Where we process your personal data by automated means (i.e. not on paper) and this processing is based on your consent or required for the performance of a contract between us, you are entitled, where technically feasible to request that we transmit your personal data in this format to another controller.
NOT BE SUBJECT TO SOLELY AUTOMATED DECISIONS.	You have the right to be informed if your personal data will be subject to automated decision making, including profiling, where that decision impacts on your legal rights. Profiling is an automated form of processing of personal data often used to analyse or predict personal aspects about an individual person.
WITHDRAW CONSENT	Where you have provided your consent to the collection and processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the information provided below. Once we have received your notification that you have withdrawn your consent, we will no longer process your personal data for the purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
THE RIGHT TO COMPLAIN TO A SUPERVISORY AUTHORITY	You have the right to make a complaint to a supervisory authority in the European Union about our compliance with applicable data protection laws.

15. UPDATING YOUR PERSONAL DATA

You are responsible for notifying us of any changes to your personal data that you provide to us.

16. CONTACT DETAILS

If you have any questions or wish to exercise any of your data protection rights, you should raise these with our data protection team by emailing [INSERT EMAIL ADDRESS]. You may also raise complaints with the **Data Protection Commission** or another supervisory authority in the European Union.

17. CHANGES TO THIS PRIVACY NOTICE

The Foundation may change this Privacy Notice from time to time and any changes will be contained in a revised Privacy Notice posted on the Website.
