



## Privacy Policy

### FCM Holdings Limited &

### Our Affiliated Entities (The FCM Group)

#### Introduction

This privacy policy ("the policy") describes how FCM Holdings Limited collects, uses and shares the information you provide to us and the information we collect in the course of operating our business and in using our websites.

In this policy, where we refer to "FCM" (or "we"/"us"/"our"), we mean **FCM Holdings Limited** of 2nd Floor, International House, 41 The Parade, St Helier, Jersey, JE2 3QQ, which is the controller of personal data obtained via our websites.

References to "FCM" (or "we"/"us"/"our") also mean the following entities which are affiliated with us for regulatory purposes:

- Odin Investment Management Limited
- FCM Limited
- FCM Trust Limited
- FCM Directors Limited
- FCM Corporate Services Limited
- Independent Financial Consultants (C.I.) Limited
- FCJ Fiduciaries Limited
- Queen Street Nominees Limited
- La Landelle (Jersey) Limited
- FCJ Resources Limited

FCM through its affiliated entities provides both investment business and trust company business in Jersey. Its affiliated entities provide a related range of related financial services, details of which can be found on our websites.

We may collect information from you through your use of these websites, when you request information from us or engage with our companies, investments, trust or other services, or as a result of your relationship with one or more of our employees or otherwise in the course of our business.

You may also be a beneficiary or a prospective beneficiary in a trust structure of which we are a trustee.

References in this notice to "your information" are also to personal information that you provide to us or which we otherwise gather in the course of operating our business.

You can contact the FCM Data Protection Lead in relation to data protection and your rights by email at [john.wood@fcmtrust.com](mailto:john.wood@fcmtrust.com) or in writing to:

The Data Protection Lead

FCM Holdings Limited

2nd Floor

International House

41 The Parade



St Helier

Jersey JE2 3QQ

### **The Information We Collect**

We may collect various types of personal data about you, including:

- your personal identification information (which may include your name and passport information, your IP address and personal data relating to claims, court cases and convictions, politically exposed person (PEP) status, personal data available in the public domain and such other information as may be necessary for FCM to provide its services and to complete its CDD process and discharge its AML/CFT/CPF obligations)
- your contact information (which may include postal address and e-mail address and your home and mobile telephone numbers)
- your family relationships (which may include your marital status, the identity of your spouse and the number of children that you have)
- your professional and employment information (which may include your level of education and professional qualifications, your employment, employer's name and details of directorships and other offices which you may hold)
- financial information, sources of wealth and your assets (which may include details of your assets, sources of wealth, shareholdings and your beneficial interest in assets, your bank details and your credit history)
- transaction data including details about payments to and from you and other details of services you have obtained from us
- profile data including usernames and passwords, details of services, your interests and preferences
- information about client and beneficiary matters which may include a (but may not be limited to) wide range of personal information about employment, health, family issues and relationships, regulatory status
- we may also collect and process personal data regarding people connected to you, either by way of professional (or other) association or by way of family relationship
- we may also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' usage data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

If you apply for a position with us we may collect personal information relating to your past employment, professional qualifications and education, your nationality and immigration/residential status, opinions from third parties about you (such as references) and other details about you which may be gathered during the recruitment process. We may also review publicly available information about you on your social media accounts.

### **Where We Obtain Your Personal Information**

We collect your personal information from the following sources:

- personal information which you give to us, such as:
  - such other forms and documents as we may request that are completed in relation to the administration/management of any of our services



- information gathered through client due diligence carried out as part of our compliance with regulatory requirements
- any personal information provided by way of correspondence with us by phone, email or otherwise
- personal information we receive from third party sources, such as:
  - our clients: in connection with matters upon which we are or may be instructed (for example where you are a beneficiary of a trust (or someone connected to such a person) or a counterparty to a transaction or an employee of one of our clients)
  - entities in which you or someone connected to you has an interest
  - your legal and/or financial advisors
  - financial institutions who hold and process your personal information
  - other publicly available sources such as Companies House, the Jersey Financial Services Registry etc.
  - credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements
  - personal information received in the course of dealing with advisors, regulators, official authorities, payment providers and service providers by whom you are employed or engaged or for whom you act.

### **Information That We Collect Through Our Website**

You are not required to provide any personal information on the public areas of our website; however you may choose to do so by completing any of the forms which are included on the following pages:

- [careers](#)
- [contact us](#)

In addition to the information you provide above, FCM collects the domain names and IP addresses of its visitors, along with usage statistics, analytics and browsing history. This data may be used to promote our services. Please see our cookies policy for more details about this. You may also provide us with personal information if you contact us by email, telephone or letter.

### **How We Use Your Information**

Unless we inform you otherwise then we may hold and process your personal information on the following lawful grounds:

- the processing is necessary to comply with our legal obligations including in any employment or social field
- the processing is necessary for our legitimate interests or the legitimate interests of a third party to whom your personal information is disclosed, provided your interests and fundamental rights do not override those interests
- the processing is necessary for the performance of a contract to which you are a party, or to take such steps, at your request, with a view to entering you into such a contract
- the processing is necessary to exercise, bring or defend a legal claim or to prevent or to establish legal rights and detect an unlawful act
- in exceptional circumstances, where we have obtained your consent to processing your personal information for a specific purpose.



At FCM we are committed to protecting and respecting your privacy. We provide investment, trust, fiduciary, corporate and other professional services to our clients and we use your personal data for those purposes. Normally the purposes for which we use your personal data will be clear when we collect that data. We will not use your personal data for purposes that are not clear when we collect that data and will only use your personal information:

- to conduct administrative or operational processes within our business
- to provide and improve our investment, trust, fiduciary and other services
- to compile anonymous statistics, for example website usage statistics
- to perform a contract which we may have with you
- to comply with our legal and regulatory obligations
- to establish, exercise or defend the legal rights of FCM or for the purpose of legal proceedings
- to process and respond to requests, enquiries or complaints received from you or someone connected to you
- to send you marketing material (e.g., client briefings)
- to provide you with personalised content
- to invite you to events
- for other legitimate business purposes
- to review and process your application should you apply for a position with us.

#### **How and Why We Share Your Information**

We may share your personal information with our associated affiliates set out at the start of this policy.

We may also share your personal information outside FCM. This may include disclosures to:

- third party agents, suppliers or contractors, in connection with the processing of your personal information for the purposes described in this policy, which may include, but is not limited to:
  - IT and communications service providers
  - our own advisers such as auditors and accountants and any external legal advisers which we may instruct from time to time
- third parties relevant to investment, trust and other services that we provide, which may include, but is not limited to:
  - counterparties (or potential counterparties) to transactions
  - banks and other financial institutions
  - other professional service providers
  - regulators
  - law enforcement agencies
  - governmental institutions
  - to the extent required by law, regulation or court order, for example if we are under a duty to disclose your personal information in order to comply with any legal obligation such as our AML/CFT/CPF obligations

We may disclose your personal information for the purposes of seeking references and confirmation of the details which you have provided should you apply for a position with us.

#### **International Transfers**

Where we transfer your personal information outside the European Economic Area (the "EEA"), we require the recipients of that personal information to put in place adequate measures to protect it and we will ensure that it



is protected and transferred in a manner consistent with legal requirements applicable to the information. This can be done in a number of different ways, for instance:

- the country to which we send the personal information may have been assessed by the European Commission as providing an "adequate" level of protection for personal data (this includes Jersey and Guernsey)
- the recipient may have signed a contract based on standard contractual clauses approved by the European Commission
- where the recipient is located in the US, it may be a certified member of the EU-US Privacy Shield scheme.

In other circumstances, the law may permit us to otherwise transfer your personal information outside the EEA. In all cases, however, any transfer of your personal information will be compliant with applicable data protection law.

You can obtain more details of the protection given to your personal information when it is transferred inside or outside Europe by contacting us at [john.wood@fcmtrust.com](mailto:john.wood@fcmtrust.com).

### **Direct Marketing**

We may ask whether you wish to receive marketing from us and this will be presented to you as an option on the relevant application form or page on our website where necessary. We may also contact you by email or other means to inform you about other services or events which may be of interest to you.

You have the right at any time to stop us from contacting you for marketing purposes. If you wish to do so, please either unsubscribe or write to our data protection contact at our address below.

### **Retention of personal information and security**

Your personal information will be retained for as long as required:

- for the purposes for which the personal information was collected
- in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations
- as required by data protection laws and any other applicable laws or regulatory requirements.

We will ensure that the personal information that we hold is subject to appropriate security measures.

If we rely on consent to process your personal information, you have the right to withdraw your consent at any time. However, if you withdraw consent it may impact on our ability to provide services.

### **Access To And Control Of Your Personal Information**

You have the following rights in respect of the personal information about you that we process:

- the right to access and port personal information
- the right to rectify personal information
- the right to restrict the use of personal information
- the right to request that personal information is erased
- the right to object to processing of personal information.

You also have the right to lodge a complaint about the processing of your personal information either with us or with the Jersey Office of the Information Commissioner (<https://jerseyoic.org>).



You can contact the Jersey Office of the Information Commissioner at the following address:

Office of the Information Commissioner

5 Castle Street

St Helier, Jersey, JE2 3BT

Or by telephone at +44 1534 716530 or by email at [enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org).

You may also have the right to make a complaint to a competent supervisory authority or in your usual place of residence, your place of work or in the place of the alleged infringement.

Where we have relied on consent to process your personal information, you have the right to withdraw consent at any time.

If you wish to exercise any of the rights set out above or for further information, please contact our Data Protection Lead at our address above or by email at [john.wood@fcctrust.com](mailto:john.wood@fcctrust.com).

#### **Inaccurate Or Amended Information**

Please let us know as soon as possible if any of your personal information changes (including your correspondence details). Failure to provide accurate information or to update information when it changes may have a detrimental impact upon our ability to provide services to you.

#### **Questions And Contact Information**

If you have any questions in relation to this policy please contact our Data Protection Lead at our address above or by emailing [john.wood@fcctrust.com](mailto:john.wood@fcctrust.com).

#### **Changes To This Policy**

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure you are aware of any changes. We last updated this policy on 26 November 2024.