

This notice sets out how SEI Investments - Guernsey Limited (“SEIG”, “we”, or “us” ) will process personal data (as a data controller) and the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this privacy notice.

## Personal data that we collect about you

SEIG rely on the group policies of SEI Investments (Europe) Limited. Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients only to share personal data where it is strictly needed for those purposes.

We process many categories of personal data, including as appropriate for the services we are providing:

- Contact details, such as name, postal address, telephone number and email address
- Investments and other financial and transactional data, such as bank account information
- Other personal data, such as date of birth, NI

We also collect personal data through a variety of sources, such as cookies and other technologies that record data about the use of our websites, websites that implement our Services, and the use of our Services generally, this may include Browser and device data (such as IP address, device type, operating system and Internet browser type, access times and referring website) and cookie and tracking technology data.

## Uses of your personal data

Your personal data may be stored and processed by us in the following ways and for the following purposes:

- **Providing services**

Some of our services require us to process personal data, whether to comply with a legal obligation or to pursue our legitimate interests, including:

- to facilitate the opening of your account and ongoing administration of your investments as necessary for the performance of your contract
- in order to carry out anti-money laundering checks and related actions appropriate to meet any legal obligations in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption and tax evasion

- to report tax related information to tax authorities to monitor and record calls and electronic communications
  - to disclose information to other third parties such as service providers, auditors, regulatory authorities and technology providers
  - to update and maintain records
  - to retain AML and other records of individuals
- **Administering, managing and developing our businesses and services**

We process personal data in order to run our business, including:

- managing our relationships with clients
  - developing our businesses, services, maintaining, and using information technology systems
  - administering and managing our website, systems, and applications
- **Security, quality and risk management activities**

Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. As part of our client and engagement acceptance, we carry out searches using publicly available sources to check that there are no issues that would prevent us from working with a particular client.

- **Providing our clients with information about us and our range of services**

With consent or otherwise in accordance with applicable law, we use client contact details to provide information that we think will be of interest about us and our services.

- **Complying with any requirement of law or regulation**

We need to keep certain records (which may contain personal data) to demonstrate that our services are provided in compliance with legal and regulatory obligations.

Where agreed with our clients, we may use information that we receive in the course of providing services to improve our service delivery and to develop new technologies and offerings.

We are entitled to use your personal data in these ways because: we have contractual obligations that we have to discharge; we have legal and regulatory obligations that we have to discharge; and we may need it in order to establish, exercise or defend our legal rights.

### **Disclosure of your information to third parties**

When we share data with others, including our affiliates, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

We may share your personal data outside of SEI and our affiliates for the following purposes:

- to third party agents or contractors for the purposes of providing services to us and to help provide, run and manage our information technology systems
- to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation
- if we sell any of our business or assets or are acquired by a third party, in which case we may disclose your personal data to the buyer / prospective buyer

### Transfers of personal data outside the European Economic Area

Where we transfer your personal data outside the European Economic Area (“**EEA**”), we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA and that all transfers of personal data outside the EEA are done lawfully. This can be done in a number of ways, for instance, under an agreement which covers the EU requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us in accordance with the “Contacting us” section below.

### Retention of personal data

- How long we hold your personal data for will be determined by various criteria including: the purpose for which we are using it (we will need to keep the data for as long as is necessary for that purpose) and any legal obligations (laws or regulation may set a minimum period for which we have to keep your personal data).

### Your rights

Where we decide how and why personal data is processed, we are a data controller and, subject to any competing legal entitlement or obligation, individuals have a number of legal rights in relation to the personal data that we hold about them:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you
- where we process personal data based on consent, the right to withdraw your consent to our processing of your personal data at any time the right to request that we rectify your personal data if it is inaccurate or incomplete
- the right to request that we erase your personal data in certain circumstances
- a right to restrict or object to our processing of personal data and the right to data portability (some of these rights will only be available from 25 May 2018)

We hope that you won't ever need to, but if you do want to complain about our use of personal data, you have the right to lodge a complaint with the Data Protection Authority ("DPA") (the Guernsey data protection regulator) by contacting the DPA, or by searching their website at <https://odpa.gg/>

### Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to our Data Protection Officer at:

SEI Investments (Europe) Limited  
1st Floor Alphabeta, 14-18 Finsbury Square  
London  
EC2A 1BR  
Phone: +44 (0)20 3810 8000  
Email: [DataProtectionOfficer@seic.com](mailto:DataProtectionOfficer@seic.com)