



Privacy Policy Statement

Who are we?

Hansard is an owner-managed boutique Guernsey licensed trust company, licenced by the Guernsey Financial Services Commission, registration reference 43734, who provide independent fiduciary services in collaboration with other trusted service providers and professionals.

Data Protection Officer (“DPO”)

Hansard’s DPO is Bernadette H A Marquis, who can be contacted by email bernadette@hansardtrust.com, telephone +44 1481 727644 or in writing to Hansard Limited, Granary House, The Grange, St Peter Port, Guernsey, GY1 2QG. Should you have any queries about the contents of this Statement please contact Bernadette.

Hansard act as a Controller and Processor of data as defined by the Data Protection (Bailiwick of Guernsey) Law, 2017, (“the Law”).

This privacy policy statement describes how Hansard collects, uses, processes and shares information and data that we collect in the course of providing our professional services to our existing clients and potential clients, a copy of which can be located on Hansard’s website www.hansardtrust.com and we would encourage you to check this page from time to time to ensure that you are aware of any changes and updates to this statement.

On occasions Hansard may refer to other links through the website however we do not accept responsibility for the consequences of the use of those links. Please be aware that these websites will have their own privacy policies over which Hansard has no responsibility or control.

Hansard’s website uses Cookies some of which may be turned on and off. By accessing the website Cookies will be activated.

Personal privacy is very important to Hansard and we are committed to ensuring that personal data is protected at all times in accordance with the Law and to provide certain information to you which is clearly set out within this Statement.

The information and data we collect

In order for Hansard to provide services to our clients as set out in our terms and conditions and/or any agreement or letter of engagement between Hansard and the clients, and/or controllers and personnel of a client in cases where the client is not a natural person, Hansard collects personal data which may include:

- Full name, address, email address, telephone number and other contact information;
- Date and place of birth;
- Nationality;
- Gender;
- Occupation, name of employer, employment history, qualifications, training records;
- Tax residency;
- Due diligence documentation (identification information and documentation i.e. passport, national ID card, driver’s license)

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- Utility bills, Bank statements;
- Additional information and documentation regarding any political status (i.e. politically exposed persons status);
- Source of wealth and source of funds information and verification documentation;
- Family and business connections, (i.e. next of kin, beneficiaries etc.);
- Beneficial ownership of entities owned by a client or potential client;
- Shareholdings and other assets legally owned by a client or potential client;
- Directorships and information required to be held by any applicable legislation;
- Details of business relationships and organisations which may be connected to a client or potential client;
- Technical data such as your internet protocol (“IP”) address and cookies;
- Any other personal information related to an individual, that a client, adviser or other party may provide to us in the course of a business relationship;
- **Special category data** – this is data, as listed below that requires extra protection due to the potential harm that may result if this data is mis-used.
 - Racial or ethnic origin;
 - Political opinion;
 - Religious beliefs or similar;
 - Trade union membership;
 - Physical or mental health or wellbeing;
 - Criminal proceedings;
 - Convictions;
 - Genetic data;
 - Biometric data;

This information is obtained to enable Hansard to fulfil our obligations in accordance with the anti-money laundering and countering the financing of terrorism legislation, the data protection legislation and other regulatory requirements in place in the Bailiwick of Guernsey and to meet our reporting obligations in accordance with the global Common Reporting Standard on Automatic Exchange of Information (CRS) and the Intergovernmental Agreements between Guernsey and the US to implement Foreign Account Tax Compliance Act (“FATCA”).

Hansard has a legal obligation to ensure that personal information and data is kept accurate and up to date. It is important individuals in respect of a business relationship inform us of any changes during a business relationship with us. Please assist us to comply with this obligation by ensuring that you inform us of any changes.

Hansard will only retain personal data for as long as necessary to fulfil the purpose it was collected it for. Personal data held on record will be destroyed following the end of a relationship in accordance with the legislative and regulatory requirements in force in Guernsey.

Where we obtain personal information

We collect personal information directly from our clients or potential clients, indirectly from third party sources for example, a legal and/or financial adviser, open source information that is publicly available over the internet and personal information received during the course of business with advisers, regulators, both within and outside the Bailiwick of Guernsey, official authorities and service providers, subscribed service sources of risk intelligence and membership registers, as applicable.

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How Hansard use personal information and data

Hansard are committed to protecting and respecting your data and privacy and consider looking after people's data a privilege, it is a pre-condition of good business practices. We may hold and process client data to perform our duties, to comply with our legal and regulatory obligations and for business purposes. It is processed to conduct administrative and operational processes within our business, in communications with clients or potential clients in connection to the services we provide. The processing of information supplied by email is also recorded in our customer relationship management system.

Sharing Data

In some cases we may be required to share or disclose your personal information with selected third parties, for example:

- Banks - it is usual practice to supply personal data information to the banks so that they can fulfil their legal and regulatory requirements to open and maintain a bank account;
- Investment Managers and Advisers;
- Property Managers or Agents;
- Legal and/or Tax Advisers;
- Accountants or Auditors;
- Tax Authorities;
- Law Enforcement Agencies;
- To comply with a court order or judgement;
- In connection with legal proceedings, obtaining legal advice or otherwise for the purposes of establishing, exercising or defending legal rights;
- Other Trust and Corporate Service Providers;
- Suppliers and sub-contractors, for the performance of any contract we enter into with them, such as IT contractors;
- Analytics and search engine providers that assist us to adhere to anti-money laundering and countering the financing of terrorism regulations and rules;
- Regulatory bodies, to comply with our legal and regulatory obligations – our domestic regulator is the Guernsey Financial Services Commission

Hansard may, as part of our ongoing provision of services, be required to transfer personal data outside of Guernsey, the European Union, and the European Economic Area or outside of other jurisdictions assessed by the Guernsey Data Protection Commissioner and/or the European Union as having equivalent and adequate data protection legislation in place. If you have any concerns in this respect please contact us to discuss the matter further.

An Individual's Rights

The Law provide individuals with a number of specific rights in respect of the processing of data. These include the right to request details of personal data relating to you, held by us and to request Hansard to delete or rectify any inaccurate information.

Please be advised that if you are concerned about the way in which Hansard handles your personal data you have the right to lodge a complaint with the Office of the Guernsey Data Protection

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Commissioner, where Hansard is registered as a Data Controller, Levy Collection Agent and Processer at the following address: The Office of the Guernsey Data Protection Commissioner.

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