Martyn Fiddler Tax – Privacy Notice

1. Overview

Martyn Fiddler Tax Limited (the 'Company' or 'MFT') is committed to protecting the privacy and security of your personal information. MFT is a subsidiary of ICM Group Limited (the 'Group').

This Privacy Notice 'Notice' describes how we collect and use personal information about you in your capacity as a client of MFT in accordance with the General Data Protection Regulation as applied in the Isle of Man ('GDPR').

MFT is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to provide you with information about our processing, which is the purpose of this Notice. This Notice does not form part of any contract to provide services. We may update this Notice at any time.

It is important that you read this Notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. The registered office of MFT is Millars Three, Southmill Road, Bishop's Stortford, Hertfordshire, CM23 3DH, United Kingdom.

2. The type of information we hold about you

Personal data, or personal information, means any information about a living individual from which that living individual can be identified. It does not include data where the identity has been removed (anonymous data).

Depending on your relationship with the Company, we may collect, store, process and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth;
- Place of birth:
- Gender;
- Passport details;
- Nationality;
- National identification numbers, tax reference numbers and tax codes;
- Tax status information;
- Years at residential address;
- Source of wealth information;
- Bank account details;
- Photographs; and
- Any other relevant information obtained through background checks and online screening.

3. How we collect your personal information

We collect personal information about you through the application and on boarding process, either directly from you or a third party representative which you have appointed. We may collect additional personal information in the course of the relationship from background check agencies.

4. Legal basis for processing your personal information

We comply with our obligations under the GDPR by, amongst other things, having a clear lawful basis and defined purposes for processing personal data, keeping it up to date; storing and destroying it securely; not collecting or retaining excessive amounts of data; and protecting personal data from loss, misuse, and unauthorised access or disclosure. We have appropriate systems and procedures in place to protect your personal information and ensure these requirements.

We will process your personal information in the following lawful circumstances:

- Where we need to perform the contract we have entered into with you or in anticipation of entering into a contract with you;
- Where we need to comply with a legal obligation; and
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override these interests.

5. Do we need your consent?

We do not need your consent when processing your personal information in accordance with this Notice. Your personal information is required to enable us to perform the contract we have entered into with you, to comply with our legal obligations and for our legitimate interests.

In limited circumstances, we may seek your consent to process particularly sensitive data or to process your personal information for certain marketing purposes. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

6. Situations in which we will use your personal information

We obtain all the categories of information in the list above (see section 2) primarily to allow us to perform our contract with you and to enable us to comply with our legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- To maintain accurate "know your customer" information and conducting anti-money laundering, sanctions and background checks;
- To provide, operate, process and administer our services or to process applications for our services;
- To fulfil foreign and domestic legal, regulatory, governmental, tax, law enforcement and compliance requirements;
- To verify the identity or authority of relevant individuals, representatives who contact us or who may be contacted by us;
- To carry out or respond to requests, questions or instructions from verified representatives;
- For risk assessment, statistical and trend analysis and planning purposes, including to carry out data processing, statistical and anti-money laundering and sanctions analyses;
- For crime and fraud prevention, detection, investigation and prosecution;
- To contact you and to respond to communications from you, including a complaint;
- To perform internal management and management reporting, to operate control and management information systems, and to carry out business risk, control or compliance reviews or testing, internal audits or enable the conduct of external audits;
- To comply with contractual arrangements or to support initiatives, projects and programs by or between financial industry self-regulatory organisations, financial industry bodies, associations of financial services providers or other financial institutions;
- To manage the Company's relationship with you;
- To comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within the Group and any other use of data and information in accordance with any Group wide programs for compliance with tax, sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- To improve the quality of our products and services, to develop additional products and services, and for staff training and quality assurance purposes;
- To protect and/or enforce our legal rights and interests, including defending any claims; and;
- To keep you updated with news emails, and information about our services, invites to our events and related information.

7. Processing of third party personal data

When you supply us with personal data about another individual you must ensure that you:

- Notify the third party that you are providing their personal information to us and obtain their permission;
- Provide the third party with a copy of this Notice;
- Promptly notify the third party of any changes to this Notice that we notify you of; and
- Ensure that, to the best of your knowledge, the personal information is accurate and up to date, and promptly notify us if you become aware that it is incorrect.

8. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract you have entered into with us, or we may be prevented from complying with our legal obligations (in which case, in any event, we might be required to terminate the client relationship).

9. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will provide you with an updated Privacy Notice which will explain the legal basis which allows us to do so.

10. Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collect it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are contained within our Data Retention Policy.

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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client of the Company we will retain and securely destroy your personal information in accordance with our Data Retention Policy.

11. Data sharing

Any data we receive relating to you or your affairs will be kept strictly confidential within MTA, unless it is appropriate for us to share your personal information with contractors, consultants, regulatory bodies, banks, persons carrying out background checks, government, tax authorities, IT service providers and other members within the Group. We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

The Company may transfer the personal information we collect about you to another country in order to perform our contract with you or where required to do so by law. We will take appropriate measures to ensure your personal data remains protected to the standards described in this Privacy Notice.

12. Contact details

If you have any questions about this Privacy Notice or how we handle your personal information, please contact our Data Protection Officer at the address details as shown within the footer of this notice with the reference - Data Protection. If you have a concern or question, we would be grateful for the opportunity to try and resolve, or answer, this directly in the first instance. You also have the right to make a complaint at any time to the Isle of Man Information Commissioner, the supervisory authority for data protection issues in the United Kingdom.