

PRIVACY NOTICE: PLURIMI GROUP

This privacy notice provides information on how Plurimi¹ collects and processes your personal data when you visit our website or receive a service from us.

1. Important information and who we are

Plurimi is made up of different legal entities, details of which can be found on our website: www.plurimi.com. When we mention "Plurimi", we are referring to the relevant company in the Plurimi Group responsible for processing your data which will be clear to you in your Client Agreement or this Privacy Notice. Plurimi Wealth LLP is the controller responsible for this website.

We have appointed a local data protection officer (DPO) in each of our Plurimi Group entity jurisdictions – details of which can be found below. If you have any questions about this privacy notice or our data protection practices, please contact the relevant DPO.

LOCAL DPO CONTACT DETAILS:

Plurimi Local Entity	Plurimi Group entity	Email	Address
David Witzer	Plurimi Wealth LLP	dpo@plurimi.com	30 St. James's Square, London SW1Y 4AL
Gabriella Salmon	Plurimi Wealth (Dubai) Limited	dpodubai@plurimi.com	Office 202, Level 2 Gate Village Building 6, Dubai International Financial Centre, Dubai, 507094, United Arab Emirates
Chiara Incardona	Plurimi Wealth Monaco SAM	dpomonaco@plurimi.com	Europa Résidence Place des Moulins, 98000 Monaco
Marcelo Porcu	Plurimi Wealth Solutions Limited	dpogibraltar@plurimi.com	57/63 Line Wall Road, Gibraltar.

¹ Plurimi means Plurimi Wealth LLP, Plurimi Wealth (Dubai) Limited, Plurimi Wealth Monaco SAM, Plurimi Wealth Solutions Limited.

OTHER USEFUL DETAILS

Plurimi Local Entity	Data Commissioner	Jurisdiction	Retention Period	Local Data Protection Legislation
Plurimi Wealth LLP	The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk	United Kingdom	5 years (from end of the business relationship)	UK GDPR and Data Protection Act 1998. The retained EU law version of the General Data Protection Regulation ((EU) 2016/679) as defined in the Data Protection Act 2018. Personal Data is subject to the legal safeguards specified in the UK GDPR.
Plurimi Wealth (Dubai) Limited	DIFC Commissioner of Data Protection commissioner@dp.difc.ae	Dubai International Financial Centre	6 years (from end of the business relationship)	Data Protection Law DIFC Law No. 5 of 2020.
Plurimi Wealth Monaco SAM	Commission de Contrôle des Informations Nominatives – CCIN 11 rue du Gabian - « Le Concorde » - 98000 Monaco Tel: (+377) 97.70.22.44	Monaco	6 years (from end of the business relationship)	Act No. 1.165 of 23 December 1993, consolidated since the Act No 1.454 of 30 October 2017.
Plurimi Wealth Solutions Limited	Gibraltar Regulatory Authority, 2nd floor, Eurotowers 4, 1 Europort Road, Gibraltar. +350) 20074636 (+350) 20072166 info@gra.gi	Gibraltar	5 years (from end of the business relationship)	Gibraltar GDPR (consisting of both Gibraltar GDPR and the Data Protection Act 2004)

2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity Data e.g., your name, date of birth, address, other contact details (including email address, telephone number, passport number, national insurance number or another national identifier)
- Contact Data including information from. e.g., phone calls, emails/letters.
- Financial Data e.g., your bank account details, other payment or financial information.
- Transaction Data.
- Technical Data.
- Profile Data.
- Usage Data.
- Marketing and Communications Data.

- Information that is automatically collected e.g., via cookies when you visit one of our websites we will collect certain information such as the type of browser used, Internet Protocol ('IP') address.
- Information which you or third parties provide to us as part of, or contained within, any supporting documentation provided to us in accordance with our General Terms and Conditions of Business or where reasonably requested by us, such as birth certificates, death certificates, marriage certificates, grants of probate and proof of identity and address.
- Information provided by you about other people associated with you e.g. name and address of a representative acting on your behalf.
- Information classified as special category data ('sensitive' personal information) e.g., relating to health. Where we collect and use sensitive personal information, this information will only be collected and used where it's needed to provide the service you have requested or to comply with our legal obligations, and where we have also obtained your express consent to process the data.

We use different methods to collect data about you:

- From you, during the onboarding due diligence process e.g., our client data booklets or financial personality questionnaires.
- While carrying out anti-money laundering checks.
- Through our client annual reviews process.
- Through visiting our website.
- Through relevant third parties.

3. How we use your personal data

We will only use your personal data for the purpose for which we collected it which may include the following:

- To register you as a new customer on our CRM platform (inc. under relevant legal or regulatory requirements, anti-money laundering and know your customer due diligence checks).
- To onboard you with a third-party (inc. a Custodian Bank or other relevant party with your consent).
- To provide services under your Client Agreement.
- To manage your relationship with us in the ordinary course of business.
- To improve our website, services, marketing, or client relationships.
- To recommend services (or products) which may be of interest to you.

We always ensure this information is collected and processed as per our legitimate interests in a way that is not excessive and unnecessary. We feel that it is in our legitimate interests to process your information to better understand you and your needs so we can:

- contact you with specific information relating to the services we provide you under our client agreement.
- send you tailored advice, based on what we know about you

- develop our performance
- collate and analyse management information

4. How we share your personal data

We will only disclose your personal information in accordance with the applicable laws and regulations as discussed in this Privacy Notice and where necessary to provide the service to you, if relevant, as per our client agreement. Whenever we share your personal information we will do so in line with our obligations to keep your information safe and secure.

We may share your personal data within the Plurimi Group and with relevant external third parties, such as:

- Our client relationship management system provider.
- IT support provider
- Relevant Custodian Banks
- Financial Auditor
- Internal Auditor
- Courts or Regulators
- Other related third parties who enable us to provide our services.

For more information, please contact the local DPO.

5. International transfers

We may transfer, store, and process your personal data outside the Jurisdiction relevant to the Plurimi Group entity with which you have a Client Agreement.

For more information, please contact the local DPO.

6. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the relevant local DPO or Data Commissioner, contact details provided above.

7. Further details

If you are looking for more information around how we process your personal data including data security, data retention and lawful processing bases, please contact the local DPO.