

## Robus Group Privacy Notice

Robus Group consists of a holding company and subsidiaries based in Guernsey and. This Privacy Notice applies to all entities in the Group.

The Group is committed to maintaining the accuracy, confidentiality and security of personal information it holds in accordance with the relevant laws. This Privacy Notice describes the personal information that the Group collects, how we use and to whom we disclose this information.

For the purposes of this Privacy Notice:

Data Protection Law ('DP Law') means the relevant legislation in each jurisdiction i.e.:

- Guernsey: Data Protection (Bailiwick of Guernsey) Law 2017
- Gibraltar: Data Protection Act 2004 (as amended)

### What is personal information?

For the purposes of this Privacy Notice, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. Personal information does not include anonymous or non-identifiable information (i.e. information that cannot be associated with or tracked back to a specific individual).

### Types of Personal Data we collect, process, hold and share include:

- Name
- Date of birth
- Residential Address
- Contact details
- Qualifications
- Proof of identity
- Tax information
- Background check data
- Source of funds (where relevant)
- Source of wealth (where relevant)
- Bank details
- Occupation / outside interests
- Special categories of data including criminal information
- Cookies and usage data (website)

### Why we collect and use this information

- Providing our contracted services
- Maintaining and using relevant electronic filing systems
- Conducting anti-money laundering/countering the financing of terrorism risk reviews
- Keeping records up to date
- Complying with any requirement of Law, Regulation or reporting to a Regulatory or Tax authority
- As an employer
- Monitoring and analysing website traffic (see Cookies section below)

We do not use automated decision making (including profiling) in any circumstances.

In the future, if we intend to process personal data for a purpose other than that which it was collected, we will update this Privacy Notice, providing information on that purpose and any other relevant information.

### **The lawful basis on which we process this information**

The Company processes personal data, including any special category data, to comply with its legal and contractual obligations.

### **Collecting this information**

Most of the information we hold will have been collected directly from the individual concerned upon our request. In some cases, we collect data from third parties, for example, referees, background checking services, or other companies in the Robus Group.

### **Cookies**

We may use cookies to identify which pages are being used. This helps us analyse data about webpage traffic and continuously improve our website. We only use this information for statistical analysis purposes and then the data is removed from the system.

Most internet browsers will accept cookies by default. You can choose to decline cookies by changing your browser settings. Please note however that you may be unable to use some features of the website if cookies are disabled.

### **Storing this information**

We hold personal data both in hard copy files and on IT systems. The information will be stored until the expiration of a period of six years after the termination of our relationship.

We take the security of personal data seriously. We have internal policies and controls in place to ensure that personal data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **Who we share this information with**

Access to personal information is limited only to staff who need it in order to fulfil their duties.

Personal data may be shared between Group companies and with contractors as necessary to fulfil our legal and contractual obligations. We may also share information with third parties at the request of the data controller, for example to our clients' banks and auditors. Additionally, information may be shared with our auditors and parties that provide certain information technology and data processing services to us so that we may operate our business.

In limited and necessary circumstances, your information may be transferred outside of Guernsey, Gibraltar or the European Economic Area, or countries not appearing on the EC Adequacy List, to comply with our legal or contractual requirements. In such cases we have implemented safeguards to ensure the security of your data, including written contracts with the relevant parties.

### **Your Rights**

Under the General Data Protection Regulation (GDPR) and the DP Law, you have certain rights with regards to your personal data. You have the right to request from us access to and rectification of your personal data. In certain circumstances, you have the right to request erasure of your personal data, the right to restrict processing, the right to object to processing, and the right to receive your data in a machine-readable format.

If you would like to make a request under any of the above-mentioned rights, please contact the relevant Robus Responsible Officer listed below, preferably by email or regular post.

You have the right to file a complaint with the relevant data protection regulatory body (see below) if you believe that we have not complied with the requirements of GDPR or the DP Law with regard to your personal data.

## **Identity and contact details of controller and Responsible Officer**

The Company is a controller and processor of data for the purposes of GDPR and the DP Law.

If you have any concerns as to how your data is processed, you can contact:

### **Guernsey**

#### Manus Carvill

Head of Risk & Compliance

**Email address:** [manus.carvill@robustgroup.com](mailto:manus.carvill@robustgroup.com)

**Correspondence address:**

Robus Risk Services (Guernsey) Limited  
PO Box 549, Town Mills, Rue du Pre, St Peter Port,  
Guernsey, GY1 6HS, Channel Islands

### **Data Protection Regulatory Body**

#### Office of the Data Protection Commissioner

St Martin's House, Le Bordage, St Peter Port

Guernsey GY1 1BR

**Email:** [enquiries@odpc.gg](mailto:enquiries@odpc.gg)

### **Gibraltar**

#### Knolly Knights

Deputy Head of Risk & Compliance

**Email address:** [knolly.knights@robustgroup.com](mailto:knolly.knights@robustgroup.com)

**Correspondence address:**

Robus Risk Services (Gibraltar) Limited  
5/5 Crutchett's Ramp, Gibraltar, GX11 1AA

#### Gibraltar Regulatory Authority

2<sup>nd</sup> Floor, Eurotowers 4, 1 Europort Road,

Gibraltar GX11 1AA

**Email:** [info@gra.gi](mailto:info@gra.gi)