LGT Wealth Management US
14 Cornhill, London EC3V 3NR

Telephone +44 (0)203 207 8000
info-us@lgt.com, **www.lgtwm-us.com**

Privacy notice for clients

Our Approach

This Privacy Notice describes what happens to the personal information* which you supply to LGT Wealth Management UK LLP, LGT Wealth Management Limited, LGT Wealth Management US Limited and LGT Wealth Management Jersey Limited (referred to as 'LGT Wealth Management', "we", "us" or "our") in connection with the services LGT Wealth Management provides to you.

LGT Wealth Management UK LLP, LGT Wealth Management Limited and LGT Wealth Management US Limited are registered with the Information Commissioner's Office (ICO) in the United Kingdom as data controllers.

LGT Wealth Management Jersey Limited is registered with the Jersey Office of the Information Commissioner (JOIC) as a data controller.

The registered address and phone number of LGT Wealth Management UK LLP, LGT Wealth Management Limited and LGT Wealth Management US Limited are:
14 Cornhill, London EC3V 3NR, +44 (0)203 207 8000.

The registered address and phone number of LGT Wealth Management Jersey Limited are:
Sir Walter Raleigh House, 48-50 Esplanade, St Helier, Jersey JE2 3QB, +44 (0)1534 786400.

LGT Wealth Management reserves the right to change this Privacy Notice from time to time and revised terms will be posted on our website.

If you have any questions about this Privacy Notice or the information we collect and use about you, please contact the applicable Data Protection Officer depending upon where your account(s) is/are held.

LGT Wealth Management UK LLP, LGT Wealth Management Limited and LGT Wealth Management US Limited
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London, EC3V 3NR

dpo-uk@lgt.com
+44 (0)203 207 8000

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Sir Walter Raleigh House
48-50 Esplanade
St Helier, Jersey JE2 3QB

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What information do we hold about you and how do we collect it?

LGT Wealth Management collects, uses and stores personal information you have provided to us or personal information which is necessary for us to provide the services you have requested.

Personal information may include but is not limited to:

- personal details (e.g. name, date of birth, nationality, marital or civil partnership status, country of residence, dependents);
- address and contact details (e.g. physical address, telephone number, e-mail address);
- identification data (e.g. passport, National Insurance Number or other identity card numbers) and authentication data (e.g.
- specimen signature);
- information on spouses, partners and other family details, or on authorised signatories and representatives;
- information about financial matters (e.g. the assets in your portfolio, account numbers, origin of assets, your bank details);
- professional and personal background information (e.g. employment, professional activity, preferences);
- information on electronic communication with LGT Wealth Management or other technical data (e.g. records of accessing
- our website);
- image and audio data (e.g. CCTV or voice recordings); and
- where necessary to provide certain services to you and with your consent, we may collect and process sensitive personal information which may include information about your physical or mental health.

We collect information through a variety of sources, including:

- the account agreements you complete for our services;
- conversations and correspondence with us, including recorded telephone lines;
- anti-money laundering verification services;
- public registers and agencies;

- our online services and website;
- agents, brokers, dealers, introducers and other intermediaries; and other companies who provide personal data for individuals with whom we seek to establish a business relationship. We may pay a fee to the providers of these services.

How do we use and upon what legal bases do we process your personal information?

We use your personal information and may share it with other third parties acting on our behalf, for several purposes. These purposes and the legal bases upon which we process your personal information are set out below:

- We may process your personal information because it is necessary for the provision of our services. This includes personal information we require to fulfil a request for our products or services prior to entering into a contract with you and for the performance of that contract.
- We may process your personal information for our legitimate interests as a business (except where your interests or fundamental rights override these). For example, it is within our legitimate interests to use your personal information:
  – to send you market commentary and information about your investments, products and services that we believe are relevant and of interest to you;
  – to respond to any enquiry or complaint you may make to us;
  – to send you a brochure introducing you to our services;
  – to invite you to an event which may be of interest to you;
  – for market research purposes, where we may contact you to ask for your feedback;
  – to prevent abuses of our website, for example, by requesting verification information in order to reset your account password (if required);
  – to ensure the security of our premises;
  – to maintain compliance with our internal policies and procedures; or
  – for our own administrative purposes, including training our staff and conducting internal audits.
- We may process your personal information to comply with our regulatory and legal obligations such as to prevent money laundering, fraud, market abuse or other criminal activity, to comply with tax laws or to meet our regulatory reporting obligations.
- We may process your information because you have given us your consent to do so. For example:
  – where you have provided us with sensitive personal information necessary for us to provide you with the services you have requested, such as information about your health or lifestyle;
  – where you have agreed we can contact you with information about the products and services we can offer to you; or
  – where you have provided information to us via our website.

If at any time after you have consented to us using your personal information for marketing purposes you wish us to stop using your information for these purposes, please email us at info-us@lgt.com.

Is automated decision-making, including profiling, carried out?

As a basic principle, our decisions are not based on automated processing of personal data. If we do so, however, we shall comply with all applicable legal and regulatory requirements. There are areas of the business where personal data are processed at least partly by automated means. The objective of this is to evaluate certain aspects of the relationship where we are obligated to do so by legal and regulatory requirements (e.g. prevention of money laundering) and for the purposes of risk management.

Is Artificial Intelligence used to conduct data processing?

Personal data may be processed using artificial intelligence (AI) technologies, including but not limited to generative AI. We ensure that such technologies are operated responsibly, safely, and in compliance with applicable regulations, including data protection and privacy laws such as the General Data Protection Regulation (GDPR) and the EU Artificial Intelligence Act. The use of AI aims to optimise processes, create efficiency gains, enhance quality, improve client experiences, and support decision-making across various business areas.

While we use AI to assist in various processes and analyses, we ensure that no fully automated decision-making that significantly affects individuals is conducted without human oversight. We maintain a "human in the loop" approach to ensure compliance with the relevant regulations. We inform you separately about the deployment of AI technologies where required by law.

Do we share your personal information with other third parties?

There are circumstances where we may wish to disclose or are compelled to disclose your personal information to third parties. For example, we may pass on your data to:

- our subsidiaries, branches or associated offices within the LGT Group;
- government institutions, regulators, authorities and courts (when legally obliged to do so) such as the Financial Conduct Authority (FCA), the Securities and Exchange Commission (SEC), the Jersey Financial Services Commission (JFSC), the ICO or HM Revenue & Customs (HMRC);
- providers of investments we recommend; and
- service providers who are processing the data on behalf of LGT Wealth Management under contractual obligations of
- confidentiality, such as IT service providers, auditors, printing services, professional advisers, credit reference agencies and fraud prevention organisations.

We will only transfer your personal information to countries outside the European Union (EU) or European Economic Area (EEA) (so-called third countries):

- where it is necessary for the implementation of pre-contractual measures or the performance of a contract;
- where it is necessary for the provision of services or processing of orders (e.g. execution of payment instructions or securities transactions);
- where it is necessary for data to be held by LGT Group so that security controls remain in place;

- where you have given us your consent (e.g. for referral to another LGT Group company for a product or service you have
- requested); and
- where it is required by law or regulation (e.g. to comply with anti-money laundering regulations or reporting obligations under tax law).

Where transfers to third countries take place, we shall engage appropriate safeguards such as 1. Obtaining authorisation from the relevant data authority; 2. Ensuring the adequacy of the regulations of the destination jurisdiction; or 3. Implementing standard contractual clauses to ensure adequate protection of the data. These disclosures of personal information to third parties will only take place in accordance with the law and for the purposes listed above.

How do we keep your personal information secure?

LGT Wealth Management takes all reasonable steps to ensure that any personal data that you provide to us is kept secure, and we have put in place measures to guard against unauthorised use of your personal information or accidental loss, destruction or damage. Because of the nature of the Internet, we cannot guarantee the security of your data transmitted to the website or via email, and any inward transmission of data is carried out at your own risk.

How long do we retain your personal information?

Your personal information will be retained for as long as it is necessary to carry out the purposes set out in this Privacy Notice (unless longer retention is required by law). However, we will not retain any of your personal information beyond this period and the retention of your personal information will be subject to periodic review. Retention periods for records are determined based on the type of record, the nature of the activity, product or service and the applicable legal or regulatory requirements. We normally keep client information for the duration of our relationship and for up to ten years thereafter. We may keep an anonymised form of your personal information, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

What are your legal rights under data protection laws?

Subject to applicable law, you may have the following rights in relation to your personal information:

- the **right to be informed** about how your personal information is collected and used;
- the **right of access** to a copy of the personal information we hold about you;
- the **right to rectification** of inaccurate or incomplete personal information;
- the **right to erasure**, in certain circumstances;
- the **right to restrict processing**, in certain circumstances;
- the **right to data portability**, in certain circumstances;
- the **right to object** to processing carried out on the basis of legitimate interests and, at any time, to processing for direct marketing purposes;
- the **right to withdraw consent** at any time, where we rely on consent;
- rights relating to **automated decision-making**, including profiling, where applicable; and
- the **right to raise a complaint with us** about how we handle your personal information.

The availability and scope of these rights may vary depending on the applicable data protection law and the nature of your relationship with the relevant LGT Wealth Management entity.

These rights are not absolute and may be subject to exemptions or limitations under applicable law. For example, where we are required by law or regulation to retain personal information, this may limit the extent to which we can comply with a request for erasure. If you wish to exercise any of your rights, or if you require this Privacy Notice or related privacy information in an alternative format, please contact us through our webform or at dpo-uk@lgt.com.

We may need to request information to confirm your identity and help us process your request securely. You will not usually have to pay a fee to exercise your rights. However, we may charge a reasonable fee or refuse to act on a request where this is permitted by law, for example if the request is manifestly unfounded or excessive. You have the right to object to the processing of your personal information for direct marketing purposes at any time, and we will stop such processing once your objection is received.

If you have a complaint about how we collect, use, share, store or otherwise process your personal information, you can contact us using the details set out in this Privacy Notice and we will investigate your concern. We encourage you to contact us first so that we can try to resolve the issue. This does not affect any rights you may have to raise concerns with the relevant regulator in the jurisdiction that applies to your relationship with the relevant LGT Wealth Management entity.

If you are not satisfied with our response, you can complain to the relevant data protection regulator.

UK
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow
Cheshire
SK9 5AF
United Kingdom
Website: https://ico.org.uk
Telephone: +44 (0)303 123 1113

US
Investor Education and Advocacy
Securities and Exchange Commission
100 F St., NE

Washington,
DC
20549-0213
USA
Website: https://www.investor.gov
Phone: +1-800-732-0330

Jersey
Jersey Office of the Information Commissioner
2nd Floor, 5 Castle Street
St Helier
Jersey JE2 3BT
Website: https://jerseyoic.org
Telephone: +44 (0)1534 716530

Linked websites

Any websites linked from our website are subject to their own terms and privacy notices. If you access other websites, you should read the privacy information published on those websites.
LGT Group may also publish separate privacy information where relevant to its own processing activities.

Cookies

For information about how we use cookies and similar technologies on our websites, please see our website privacy and cookies notice.

*"Personal Information" means information about a living individual who can be identified from that information (either by itself or when it is combined with other information). For the purposes of this notice, the term "personal information" encompasses all information defined as customer information and sensitive customer information under Regulation S-P: Privacy of Consumer Financial Information and Safeguarding Customer Information.