

## 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, LGT Wealth Management Jersey Limited, LGT Wealth Management (CI) Limited (referred to as 'LGT Wealth Management', 'our' or 'we') 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 a data controller.

LGT Wealth Management Jersey Limited and LGT Wealth Management (CI) Limited are 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 and LGT Wealth Management (CI) Limited are:  
Sir Walter Raleigh House, 48-50 Esplanade, St Helier, Jersey JE2 3QB, +44 (0)1534 4786400.

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  
14 Cornhill  
London, EC3V 3NR

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

LGT Wealth Management Jersey Limited and LGT Wealth Management (CI) Limited  
Sir Walter Raleigh House  
48-50 Esplanade  
St Helier, Jersey JE2 3QB

dpo-uk@lgt.com  
+44 (0)1534 786400

### 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 grounds 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 basis upon which we process your personal information are set out below:

- We may process your personal information because it is necessary in connection with 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 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 in order 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;
  - 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 and you wish us to stop using your information for these purposes, please email us at [info-us@lgt.com](mailto: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. 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 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).

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. 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?**

Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of their personal information. Individuals also have the right to lodge a complaint with the relevant information protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below:

- Right to be informed. You have the right to be informed about how we collect and use your personal information.
- Right to obtain a copy of your personal information. You have the right to obtain a copy of the personal information we hold about you. If you would like to obtain a copy of this information please email us at [info-us@lgt.com](mailto:info-us@lgt.com). You may be required to submit a proof of your identity and a fee.
- Right to rectification. You may request that we rectify any inaccurate and/or complete any incomplete personal information.
- Right to withdraw consent. You may, as permitted by law, withdraw your consent to the processing of your personal information at any time if that is the legal basis upon which we are processing your information. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal information is essential.
- Right to restrict processing. You may, as permitted by law, request that we restrict or limit processing your personal information.
- Right to erasure. You may request that we erase your personal information, unless there is a lawful reason for us not doing so.
- Right to data portability. You have the right to request a copy of your information in a structured, commonly used and machine-readable format; and
- Right to lodge a complaint with the supervisory authority. We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the ICO or SEC directly using the contact details below.

You also have a right to object to the processing of your data for the purposes for direct marketing, and we must comply with your request. You may also object to the processing of your information where we are processing your data for our legitimate business interest or for statistical or research purposes, although we may have compelling legitimate grounds to continue processing your data.

To contact the Information Commissioner's Office for more information on your rights or other question you may have, please visit the ICO website or contact them via the following:

Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow, Cheshire  
SK9 5AF, United Kingdom

Phone: +44 (0)303 123 1113

To contact the Securities and Exchange Commission for more information on your rights or other question you may have, please visit the SEC website or contact them via the following:

Investor Education and Advocacy  
Securities and Exchange Commission  
100 F St., NE  
Washington,  
DC  
20549-0213  
USA

Phone: +441-800-732-0330

If your account(s) is/are held with LGT Wealth Management Jersey Limited or LGT Wealth Management (CI) Limited, to contact the Jersey Office of the Information Commissioner information on your rights or other questions you may have, please visit the Jersey ICO Website at <https://jerseyoic.org> or contact them via the following:

Jersey Office of the Information Commissioner's Office  
2nd Floor, 5 Castle Street  
St. Helier, JE2 3BT, Jersey

Phone +44 (0)1534 716530

#### **Linked websites**

Please note that any websites that may be linked to our website are subject to their own privacy policy. LGT Group's data protection notice can be found on their website ([www.lgt.com](http://www.lgt.com)), and we encourage you to read that notice as well to understand how LGT may process your data.

#### **Cookies**

For more information please visit our [data privacy notice for website visitors](#).

\*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.