

# Privacy Notice



This Privacy Notice is intended for clients of the following RBC Private Client and Fiduciary Services ("RBC PCFS") legal entities:

- RBC Trust (Company) International Limited
- RBC Trustees (Guernsey) Limited
- Royal Bank of Canada Trust Corporation Limited

We are firmly committed to protecting your personal, financial and business information. We want you to understand:

- what personal information we collect about you;
- how we obtain your personal information;
- how we use your personal information;
- on what basis we use your personal information;
- with whom we share your personal information;
- the countries to which we transfer your personal information;
- how long we keep your personal information; and
- your rights regarding your personal information.

If you have any questions, feel free to get in touch via one of the methods set out in the Contact Us section.

## What personal information do we collect about you?

The information we may collect from you includes:

- information establishing your identity (for example, name, address, phone number, date of birth, etc.) and personal background (and may include personal information concerning your family members, if provided to us);
- information related to transactions or financial behaviour arising from your relationship with and through us, and from other financial institutions including payment history and credit worthiness;
- information you provide on an application form for any products and services; and
- details about persons with an interest in entities or arrangements connected to your relationship with us, including but not limited to shareholders, partners, trustees, settlors, protectors, and beneficiaries.

## How do we obtain your personal information?

During the course of providing RBC PCFS services, we may collect and confirm information about you. We will only use personal information which constitutes personal data in accordance with applicable data protection laws.

We may obtain this information from a variety of sources including from you, credit reporting agencies, financial institutions, registries, references you provide to us and from other sources, as is necessary for the provision of our products and services.

We may make searches with licensed

credit reference agencies, which will keep a record of that search. Where our customer is a corporate or other institutional customer, we may also make enquiries with licensed credit reporting or fraud prevention agencies about your directors or partners (as the case may be). In connection with any request for credit or an authorised overdraft, we may make searches on public registers of mortgages, charges, liens or other security interests, and the relevant registrar may keep a record of that search.

If you communicate with us using email or by other electronic means, then we may monitor email or other electronic traffic to gather information for the purposes of security, statistical analysis and systems development.

## How do we use your personal information?

We may use or process your information for the following purposes:

- to verify your identity and investigate your personal background;
- to facilitate or otherwise assist in the provision of your account with us or any service provided by us to you;
- to service any of your other relationships with RBC;
- to meet our or RBC's regulatory and/or legal and/or financial and/or other reporting obligations in Jersey, Guernsey, the UK or in any other jurisdiction (as applicable);
- to comply with laws, regulations, or court orders in any jurisdiction (whether or not the same is strictly binding or capable of being enforced against us);

- to prevent or detect fraud, money laundering, terrorist financing or other criminal conduct (including, without limitation, compliance with RBC's internal know your client, anti- money laundering and anti-bribery and corruption policies);
- to recover a debt;
- to assess and manage our operations and financial and insurance risks;
- to maintain the accuracy and integrity of information held by a credit reporting agency and to perfect any security interest granted over an account with us;
- to develop new products and services;
- to bring or defend any dispute or litigation concerning your account with us or the services provided by us to you;
- to determine your suitability for products and/or services offered by us or RBC;
- to satisfy any health, education, social work or related regulatory requirements, or for the sake of research or history or to prepare or contribute to high-level anonymised statistical reports;
- as a record of any information obtained from or about you in the course of our relationship;
- to allow for certain efficiencies including operating and managing systems, systems back-up and data recovery, risk evaluations, know your client procedures to verify client identity, and anti-money laundering screening; and
- to enable share issuing companies, including RBC's clients and others, to identify and communicate with their shareholders.

We may wish to send to you information on services or other offerings which we believe will be of interest to you. Using your personal information helps us to make our

communications with you more relevant, selective and personalised to you, and to make your experience of our services efficient and effective. If you do not wish to receive this information you should notify us in writing as described in the "Your Rights" section.

### **On what basis do we use your personal information?**

We use your personal information on the following basis:

- to comply with legal and regulatory obligations;
- to perform our contractual obligations to you;
- for legitimate business purposes. Using your personal information helps us to operate and improve our business and minimise any disruption to the services that we may offer to you. We also have a legitimate interest in sending you information on services and offerings which we believe will be of interest to you. See the "How do we use your personal information" section for further details about the legitimate business purposes for which we process personal information;
- because you have given your consent (if we expressly ask for consent to process your personal information, for a specific purpose); and
- to prevent and detect crime, or for reasons of substantial public interest, and for the establishment, exercise or defence of legal claims or proceedings.

Notwithstanding that we may ask for your consent to share your confidential information, unless expressly stated otherwise we rely on another legal basis to process your personal information, as set out above.

### **With whom do we share your personal information?**

We will only disclose or transfer

your information for the purposes set out in this document to:

- RBC's employees, agents and service providers and other companies within RBC, who are required to maintain the confidentiality of this information;
- companies and organisations that assist us to process transactions including, but not limited to, stock exchanges and clearing houses;
- regulatory, police authorities or law enforcement and fraud prevention agencies, where we or RBC are compelled or permitted or required to do so by order of a court or governmental or administrative tribunal or by law, regulation or any other legal requirement;
- credit reporting agencies, to whom we provide credit information, details of how your account is operated in instances such as where you have fallen behind with repayments on a debt or other liability owed to us, financial and other related information and who may share it with others;
- any joint client with whom you hold a joint account, and/or any person you nominate in the application form (or otherwise) as having authority on your account with us;
- any person to whom we may assign or transfer our rights and/or obligations under our agreement with you or any third party as a result of a restructuring, sale or acquisition of Royal Bank of Canada or any of its direct or indirect subsidiaries, provided that the recipient uses the information for the same purpose as it was originally supplied to us and/or used by us;
- such persons as we believe is necessary where a failure to make such disclosure would result in damage to our

reputation or good standing, expose us to civil or criminal prosecution in any jurisdiction or where failure to make such disclosure would in our opinion be prejudicial to us, RBC, our nominees, advisors or agents or to such other person that we or RBC believe in good faith have a right to make a request for disclosure;

- the issuer of shares listed on a relevant European market (either directly or via an intermediary) where we are required by law to provide such a company with details of its shareholders; and
- any other person where disclosure is made at your request or with your consent (including your advisors or agents), or if otherwise permitted under our agreement with you.

### Transfers of your personal information outside of your data controller's jurisdiction

Delivering our services may result in certain of your personal information being transmitted through or stored or processed in jurisdictions other than the jurisdiction where your data controller is based (see the "Your Data Controller" section).

These other jurisdictions may be outside the UK, the Channel Islands and/or the European Economic Area, and also may result in your information being subject to the laws of those other jurisdictions, whether or not those jurisdictions have equivalent or adequate data protection legislation.

Depending on the jurisdiction where your data controller is based, these other jurisdictions may include:

- Jersey;
- Guernsey;
- Canada; and/or
- United States of America.

If we transfer your personal information outside of the jurisdictions where your data controller is based, we will implement appropriate measures to ensure that your personal information remains protected and secure when it is transferred outside of your home country, in accordance with applicable data protection and privacy laws. The measures include:

- in the case of transfers of personal information to an RBC company in the United States of America, entering into Standard Contractual Clauses with that RBC company. For further information, please contact [dpo@rbc.com](mailto:dpo@rbc.com); and
- ensuring that the jurisdictions into which your personal information is transferred contain equivalent data protection legislation and requirements to those applicable to the UK and the Channel Islands (such as Canada).

### How long will we keep your personal information?

We will only retain the information we gather from you for as long as necessary. In accordance with the RBC PCFS Document Retention Policy, this will usually reflect the retention periods required from time to time under relevant laws and regulations to which RBC PCFS legal entities are subject, including those relating to record keeping and prescription periods as may be applicable in the UK and the Channel Islands. It may include retaining certain types of information after your account with us has been closed, and/or for customer identification purposes.

### Your rights

If you believe that any of the information we hold about you, including your personal information, is incorrect or inaccurate, you should notify

us so that the information can be updated or corrected, as appropriate.

You have the right to:

- access your personal information;
- request correction, restriction, portability or erasure of the information that we process about you;
- object to us using your personal information where we are doing so solely on the basis of our legitimate business purposes or in relation to our use of your personal information for direct marketing purposes.

These rights are subject to any applicable exemptions under the data protection laws.

You may seek to exercise these rights at any time by sending a request by email to [dpo@rbc.com](mailto:dpo@rbc.com) or writing to Data Protection Officer, 100 Bishopsgate, London, EC2N 4AA and providing further information (including appropriate proof of identity) as requested by us.

You can withdraw your consent to the processing of your personal information (where we are processing your personal information based on your consent). If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, this may limit or prevent us from providing the products or services you have asked for. It may also make it more difficult for us to advise you or suggest appropriate alternatives.

If you feel that we do not comply with applicable privacy rules you have the right to lodge a complaint with a competent data protection authority and to lodge an appeal following the determination of that complaint.

## Data Controller

Depending on your relationship with RBC PCFS, one or more of the RBC PCFS legal entities set out above act as data controllers of your personal information.

## Contact us

Our Data Protection Officer can be contacted by email at [dpo@rbc.com](mailto:dpo@rbc.com) or writing to Data Protection Officer, 100 Bishopsgate, London, EC2N 4AA.

[rbcwealthmanagement.com](http://rbcwealthmanagement.com)



\*Calls may be recorded

RBC Trust Company (International) Limited. Registered office: Gaspé House, 66-72 Esplanade, St Helier, Jersey JE2 3QT, Channel Island, registered company number 57903.

RBC Trustees (Guernsey) Limited. Registered office: PO Box 48, Dorey Court, Admiral Park, St Peter Port, Guernsey, GY1 3BQ, Channel Islands, registered company number 37379.

Royal Bank of Canada Trust Corporation Limited registered in England and Wales No. 00849073. Registered address: 100 Bishopsgate, London, EC2N 4AA.

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