

SEI Investments – Guernsey Limited (“SEIG”, “we”, or “us”) of 1st and 2<sup>nd</sup> Floors, Elizabeth House, Les Ruettes Brayes, Guernsey, GY1 1EW recognize the importance of protecting your personal data. This privacy policy describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in our privacy notices (please follow the links below) or as otherwise stated at the point of collection.

Personal data is any information relating to an identified or identifiable living person. When “you” or “your” are used in this policy or our notices, we are referring to the relevant individual who is the subject of the personal data. SEIG processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

SEIG rely on the group policies of SEI Investments (Europe) Limited. When collecting and using personal data, our policy is to be transparent about why and how we process personal data. To find out more about our specific processing activities, please go to the relevant privacy notices as set out below under the heading "Our Processing Activities" in this privacy policy.

## Our processing activities

To find out more, please see the documents relevant to you below. (All links are to PDF files.)

- Business contacts: [Marketing Privacy Notice](#)
- If you have been directed to our website by us or by your wealth manager as we provide custody services to you: [Client Privacy Notice](#)
- Corporate Clients (and individuals associated with our corporate clients): [Client Privacy Notice](#)
- Vendors (including subcontractors and individuals associated with our suppliers and subcontractors): [Client Privacy Notice](#)

## Visitors to our website

Visitors to our websites are generally in control of the personal data shared with us. We may capture limited personal data automatically via the use of cookies and analytics tools on our website. We receive personal data, such as name, title, company address, email address, and telephone and fax numbers from website visitors; for example when an individual registers updates from us.

Visitors are also able to send an email to us through the website. Their messages will contain the user’s screen name and email address, as well as any additional information the user may wish to include in the message. We ask that you do not provide special categories of personal data (such as race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; and, criminal records) to us when using our website.

- Where you submit your contact details, unless we are asked not to, we may contact you with information about SEI’s business, services and events, and other information which may be of interest to you. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, we will provide

instructions on the appropriate webpage, in our communication to the individual, or the individual may contact us;

- To administer and manage our website, including to confirm and authenticate your identity and prevent unauthorised access to restricted areas of the site;
- To communicate with you in order to distribute requested materials or ask for further information;
- To personalise and enrich your browsing experience by displaying content that is more likely to be relevant and of interest to you;
- To understand how people use the features and functions of our websites in order to improve the user experience; and
- Any other purposes for which you provided the information to SEI (such as to subscribe you to the updates you request).

Our websites do not collect or compile personally identifying information for sale to non-SEI parties for their marketing purposes.

We use small text files called "cookies" which are placed on your hard drives to assist in personalising and enriching your browsing experience by displaying content that is more likely to be relevant and of interest to you. The use of cookies is now standard operating procedure for most websites. However if you are uncomfortable with the use of cookies, most browsers now permit users to opt-out of receiving them. You need to accept cookies in order register on our website. You may find other functionality in the website impaired if you disable cookies. After termination of the visit to our site, you can always delete the cookie from your system if you wish.

Our website may link to third party sites not controlled by SEI and which do not operate under SEI's privacy practices. When you link to third party sites, SEI's privacy practices no longer apply. We encourage you to review each third party site's privacy policy before disclosing any personally identifiable information.

Personal data collected via our websites will be retained by us for as long as it is necessary (e.g. for as long as we have a relationship with the relevant individual).

## **Security**

We take the security of all the data we hold very seriously. There are dedicated SEI information security policies, controls and practices document that sets out an information security framework and corporate controls. Reports are made on a regular basis to SEI senior management and on a quarterly basis to the SIEL Board Risk Committee. SIEL have a Nominated Data Protection Officer and a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

## **When and how we share personal data and locations of processing**

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place as appropriate to protect the data and to comply with our data protection, confidentiality and security standards.

- We may share your personal data outside of SEI and our affiliates for the following purposes:
  - to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation
  - to third party agents or contractors for the purposes of providing services to us and to help provide, run and manage our information technology systems

- Where we transfer your personal data outside the European Economic Area (“EEA”), we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA and that all transfers of personal data outside the EEA are done lawfully. This can be done in a number of ways, for instance, under an agreement which covers the EU requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

Changes to this privacy policy or our privacy notices

We recognise that transparency is an ongoing responsibility so we will keep this privacy policy and our privacy notices under regular review.

## **Data controller and contact information**

We are generally controllers for the personal data we process; however, we provide some services as a processor (in which case our client is the controller). If you have any questions about this privacy statement or how and why we process personal data, please contact us at:

Data Protection Officer  
SEI Investments (Europe) Limited 1st Floor Alphabeta  
14-18 Finsbury Square  
London EC2A 1BR  
Phone: +44 (0)20 3810 8000  
Email: [DataProtectionOfficer@seic.com](mailto:DataProtectionOfficer@seic.com)

Individuals’ rights and how to exercise them

Individuals have certain rights over their personal data and controllers are responsible for fulfilling these rights.

Individuals’ rights may include the right of access to personal data, to rectification of personal data, to erasure of personal data / right to be forgotten, to restrict processing of personal data, to object to processing of personal data, to data portability, the right to withdraw consent at any time (where processing is based on consent) and the right to lodge a complaint with a supervisory authority.

Please see further information about these rights, when they are available and how to exercise them in the relevant privacy notice above.

## **Complaints**

We hope that you won’t ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to our Data Protection Officer. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred within the EU. The Data Protection Authority (“DPA”) is the Guernsey data protection authority. For further information on your rights and how to complain to the DPA, please refer to <https://odpa.gg/>.