

Client Privacy Notice

m.advisory provides legal and advisory services to a wide range of clients. In the process of managing our business and providing these services, we collect and handle personal information.

The purpose of this privacy notice is to inform you of how we handle your personal information. Please note that we may revise this Privacy Notice as necessary from time to time and we will announce the changes on our website located at www.martinsadvisory.com and bring them to your attention to the extent it is practicable to do so.

Nothing in this Privacy Notice affects any right you have under any applicable law, including the Cayman Islands' Data Protection Law 2017 (**DPL**) and any other data protection law that applies to you.

<p>Why this may apply to you</p>	<p>This Privacy Notice will apply to you only if you are at least one of the following types of persons:</p> <ul style="list-style-type: none"> (a) Private Client. Individuals who enter into, or are contemplating entering into, contract for the provision of legal or advisory and related services with us in connection with their own personal affairs, as well as individuals who are sole practitioners / traders and enter into contract for the provision of legal or advisory services directly with us in connection with their own profession or trade; (b) Client business contacts. Individuals who are employed or otherwise engaged by legal entities which enter into, or are contemplating entering into, a contract for the provision of legal or advisory services directly with us (<i>Corporate clients</i>) and interact with us in the course of our business; (c) Business Owners and Controllers. Individuals who are in control of our corporate clients and their affiliates /
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	<p>subsidiaries by virtue of being the beneficial owners (regardless of the form of ownership), as well as individuals who exercise control over our corporate clients and their affiliates / subsidiaries through executive powers vested in them (regardless of whether or not they hold any ownership interest in our corporate clients or their affiliates / subsidiaries), including directors, officers, employees, shareholders, creditors, or agents;</p> <p>(d) Other Relevant Individuals. Individuals who do not belong to any of the foregoing categories but interact with us in connection with (or are otherwise affected by) the legal or advisory services provided or the business conducted by us. Depending on the circumstances, such individuals can include, without limitation, the following:</p> <ul style="list-style-type: none">(i) individuals who have matters pending with our clients;(ii) individuals who work for other entities that interact with us in connection with the legal or advisory services we provide to our clients;(iii) individuals who have invested in any fund, scheme, or arrangement which are established, managed, or administered by our clients;(iv) individuals who work for entities that provide goods and services to us;(v) individuals who visit our website and other social media spaces, including LinkedIn, Youtube, Facebook, and any other social media;(vi) individuals who express an interest or apply for employment with us; and(v) individuals who have no business relationship with us but visit or register on our website to receive emails updates and alerts or other services or materials from us.
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<p>Entity responsible for handling your personal data</p>	<p>Where this Privacy Notice applies, m.advisory is the entity responsible for the proper handling of my personal information.</p>
<p>The personal information that we collect</p>	<p>The types of personal information which we collect will vary significantly depending on numerous factors, including your personal circumstances, the nature of your relationship with us, and the nature of the legal services we are asked to perform.</p> <p>The personal information we obtain can be grouped into the following categories:</p> <ul style="list-style-type: none"> (a) Contact Details. Your contact details such as title, name, postal address, email address, phone number, including WhatsApp and other communications details; (b) KYC Records. Information about you which we are obliged to check for legal or regulatory reasons, such as your date of birth, country of residence, tax residency, nationality, source of income, source of wealth, utility and residential details, any ownership interest in any entity or asset you hold, and other like information concerning your identity and background (which may include, where applicable, sensitive information such as any civil or criminal record you have and any sanction or embargo enacted against you); (c) Service Records. Information about you which we obtain in order to provide our legal or advisory services. Depending on the circumstances and the nature of your relationship with us, such information may include, without limitation, instruction you give, advice and opinion you receive from us, actions you take based on our advice / opinion, action we take towards you based on instruction we receive from our clients, information concerning your assets and liabilities, information about your personal circumstances, family members, associates and others affiliated with you, as well as information of a sensitive nature, such as information concerning your mental, financial or physical health;

	<p>(d) Other Records. Other information about you which we may obtain as part of our day-to-day business operations, including but not limited to, your attendance at conferences, seminars, webinars, social platform presentations or events, and other events hosted or sponsored by us, and your preference with respect to marketing communication sent by us.</p> <p>We will collect your personal information only where we are legally permitted to do so, and only to the extent it is appropriate and necessary.</p>
<p>Why we collect, and how do we use your personal information</p>	<p>We handle your personal information for one or more of the following purposes:</p> <p>(a) Service Delivery and general communication. To enable and facilitate the provision of legal and advisory services and to communicate with you about any information that you have requested. Further information about the services we provide is available online at www.martinsadvisory.com;</p> <p>(b) Service Development. To improve our existing services and devise new services, including by contacting you on surveys and publication reviews and ratings;</p> <p>(c) Service Marketing. To promote the services we offer and related services some of our partners and affiliates may offer;</p> <p>(d) Client Relationship Management. To manage, maintain, and develop our relationship with our clients;</p>

	<p>(e) Business Administration. To facilitate the effective management and administration of our business, including in relation to matters such as business planning, budgeting, and forecasting, as well as enforcement of our terms of engagement and collection of our fees;</p> <p>(f) Legal and Regulatory Compliance. To ensure our compliance with all relevant legal and regulatory requirements, including, without limitation, legal requirements relating to money laundering, terrorism financing, proliferation financing, criminal conduct, bribery and corruption, tax evasion, sanctions / embargoes, economic substance, FATCA, CRS, and export control.</p>
<p>How we collect your personal information</p>	<p>We endeavour to collect your personal information directly from you wherever possible.</p> <p>However, the nature of the services we perform and the context in which we handle your personal information can often result in us collecting your personal information indirectly from third party sources.</p> <p>Additionally, there may be circumstances where we are required to seek your personal information from independent sources (for example where we need to use your personal information to comply with legal requirement to validate your identity and background).</p> <p>Sources from which we may obtain your personal information can be described as follows:</p>

	<ul style="list-style-type: none"> (a) Those who have referred you to us, such as your business contact; (b) Your lawyer, accountant, tax advisor, banker, wealth manager, and other such advisors who provide your personal information to us on your behalf; (c) Publicly accessible websites, registers, and databases, including official registers of companies and businesses, database of journals and news articles, and social media such as LinkedIn; (d) Providers of background check and business risk screening services, such as operators of fraud and financial crime databases, and operators of sanctions/embargoes databases (in some cases they can include authorities such as government departments and the police), and operators of credit, financial, civil and criminal background checks and other types of data; (e) The relevant Corporate client to whom we provide the service and who entrusts us with your personal information. Depending on the context, this could be, for example, the business which is owned or controlled by you or the business for which you work.
<p>In handling your personal information, we rely on the following legal justifications</p>	<ul style="list-style-type: none"> (a) Contractual Necessity. This justification comes from paragraph 2, Schedule 2 of DPL and we rely on it where we handle your personal information in order to discharge the contractual obligations we owe to you;

	<p>(b) Legitimate Business Interest. This justification comes from paragraph 6, Schedule 2 of DPL and we rely on it where we need to handle your personal information in order to meet our own requirement to operate, manage, and develop our business (provided that we can strike the right balance between our interests and your interests);</p> <p>(c) Legal and Regulatory Requirement. This justification comes from paragraph 3, Schedule 2 of DPL and we rely on it where we handle your personal information for the purpose of Legal and Regulatory Compliance;</p> <p>(d) Consent. This justification comes from paragraph 1, Schedule 2 of DPL and we rely on it where we handle your personal information based exclusively on your consent. We would not ordinarily rely on consent, but occasionally, where none of the other legal justifications are available to us (e.g. if we are to handle your personal information for any purpose other than those that are described above), we may choose to rely on Consent.</p>
<p>We may use personal information for marketing purposes</p>	<p>We may from time to time use your personal information to promote to you the legal and advisory services we offer and other related services. However, we will do so only if you are:</p> <p>(a) someone who has done business with us as a private client, a client business contact, or by being involved in transactions which also involved;</p> <p>(b) someone who has indicated an interest in the legal or advisory services we offer, for example by registering on our website to receive email updates and alerts from us, or exchanging business cards with us at a conference, event, or a business meeting; or</p> <p>(c) someone who has never done any business with us but whom we have identified (based on business-related information such as your position and title,</p>

	<p>the company for which you work, etc.) as potentially having an interest in the business-related service offered by us.</p> <p>Where we contact you for such purpose, we will typically contact you by email or postal mail (including via third party marketing service providers acting on our behalf) but where the situation warrants, we may contact you by telephone, including via apps such as Whatsapp. We will always observe the applicable direct marketing rules when contacting you and we will always respect your marketing preferences.</p> <p>If you wish to stop receiving promotional emails and legal updates from us, you can make use of the 'unsubscribe', 'opt out', or 'update your marketing preference' link we include within our promotional emails and updates. If for whatever reason such links are not functioning or missing, or if you feel that we have otherwise failed to respect your marketing preference, please alert your contact person within m.advisory.</p>
<p>We may share your personal information with others</p>	<p>We will share your information with others only if and to the extent it is appropriate and necessary to do so. Whenever we share your personal information, whether internally or externally, we will ensure that such sharing is kept to the minimum necessary.</p> <p>The extent to which we share your personal information will vary depending on your circumstances and relationship with us, but your personal information may be shared with one or more of the following categories of recipients:</p>

	<p>(a) Our corporate clients (if you are a client business contact, this could be your employer);</p> <p>(b) Companies, trusts, and partnerships that are affiliated with us, including those who perform any of the support roles or provide the ancillary services as described below;</p> <p>(c) Those who support our business operations, for example data centre operators, IT service providers, administrative support service providers, marketing and advertising partners, insurers, accountants, consultants, auditors, etc.;</p> <p>(d) Providers of background check and business risk screening services, such as operators of fraud, civil, criminal and financial crime databases, and operators of sanctions/embargoes databases as well as other providers of background check that may be relied upon for comprehensive screening purposes;</p> <p>(e) Those who provide ancillary services which complement the legal or advisory services we provide, for example those who provide legal entity formation/registration services, fund administration services, fiduciary services, directorship services, accounting services, AEOI services and other related services;</p> <p>(f) Those who participate in or contribute to transactions, arrangements, schemes, legal proceedings, public inquiries, regulatory investigation, and other like matters in respect of</p>
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	<p>which we provide our legal services, including those who are opponents of our private clients and corporate clients (if any), as well as other lawyers, experts and professional advisors;</p> <p>(g) Government departments and agencies, police, regulators, courts, tribunals, and other like authorities with whom we are legally obliged to share your personal information, or with whom we decide to cooperate voluntarily (but only to the extent we are legally permitted to do so).</p>
<p>International transfers and data storage</p>	<p>We may disclose or transfer personal data in the context where such data is processed and/or stored on servers of the cloud-based database management service providers located in other locations.</p> <p>If disclosure or transfer of personal data is being done in a country that does not ensure an adequate level of protection of your personal data, we will make sure additional safeguards will be put in place.</p>
<p>Security of your personal information</p>	<p>We use industry standard organizational, technical, and administrative measures to protect your personal information under our control. When you submit information through a form on our website, we may encrypt the transmission of that information. However, no data transmission over the Internet or any other network can be guaranteed to be 100% secure. While we strive to protect information, we cannot and do not guarantee the security of any information you transmit.</p> <p>In the unfortunate event your personal information under our control becomes compromised due to a breach of our security, we will act promptly to identify the cause and take the necessary steps to contain and mitigate the consequences of the breach. Where</p>

	<p>appropriate, we will also notify you of the breach in accordance with DPL and any other applicable law which requires us to notify you of the breach.</p>
<p>Information retention period</p>	<p>The personal information about you which we collect will typically be retained for at least the duration of the relevant matter in respect of we provide our legal services. Thus, where we obtain your personal information in connection with a court case or a corporate transaction, we will retain your personal information for as long as the court case or transaction remains open and pending.</p> <p>Once the matter is closed, for example because the underlying court case or transaction has settled, closed, or otherwise reached its end, then we will retain your personal information as part of our business records for the duration of the applicable retention period, which will be determined by reference to any legal or regulatory record keeping requirement that applies to us.</p> <p>For example, the rules concerning prevention of money-laundering mean that if any of your personal information forms part of KYC Records, we will have to retain it for as long as we continue to have client-advisor relationship with you (if you are a private client) or the relevant corporate client (if you are a business owner), and then for several years following the end of the client-advisor relationship.</p> <p>In the absence of any specific legal or regulatory record-keeping requirement which applies, we may retain your personal information for an appropriate period where we consider this to be necessary to protect ourselves from any legal claim or dispute that may arise in connection with the relevant services we have provided.</p>

	<p>Where we do so, the retention period applied to your personal information will reflect the relevant limitation periods.</p>
<p>Your rights in respect of your personal information</p>	<p>Under the DPL, you have certain legal rights in respect of your personal information handled by us. These include the following:</p> <ul style="list-style-type: none"> (a) The right to ask us to confirm whether or not we handle any personal information about you; (b) The right to ask us to provide you with copies of your personal information we hold; (c) The right to ask us to correct any inaccuracy or incompleteness in your personal information we hold; (d) The right to ask us to stop handling your personal information or to not begin the handling of your personal information; (e) The right to ask us not to subject you to automated decision-making that uses your personal information; (f) The right to object to us using your personal information for direct marketing purposes.
<p>Navigation and cookies</p>	<p>Please note that we are the controller of personal data collected through our website (the “Website”).</p>

	<p>We collect personally-identifiable information on certain areas of the Website when users register, request publications or other information, send us instructions in connection with services, sign up for conferences and events, apply for jobs, and participate in user posting areas, such as bulletin boards, discussion forums, and surveys.</p> <p>The personally-identifiable information collected may consist of information that you provide, such as names, mailing addresses, e-mail addresses, telephone and fax numbers, and, for recruiting purposes, any other personally-identifiable information on your resume.</p> <p>The Website also uses cookies to identify you and your interests and to track usage of the Website. Cookies are small pieces of text stored on your computer that help us know which browser you are using and where you have been on the Website and on websites to which you may link in order to use some of our features. By accepting our cookie, you will be permitted access to certain pages of the Website without having to log in each time you visit.</p> <p>A user who does not accept the cookie from the Website may not be able to access certain areas of the Website. We also log IP addresses, access history or the location of computers on the internet, to help diagnose problems with our server, to administer the Website and/or to prevent or remedy any security incidents. If you prefer not to accept a cookie, you can set your web browser to warn you before accepting cookies, or you can refuse all cookies by turning them off in your web browser.</p>
<p>Contact information</p>	<p>If you would like to exercise any of the rights you have in respect of your personal information, or if you have any question or concern regarding the way in which we</p>

	handle your personal information, then please reach out to your usual contact person in the first instance.
Complaints	<p>If you have a complaint regarding the way in which we handle your personal information, you can do so by emailing your complaint to: susanparsons@martinsadvisory.com</p> <p>We will endeavour to respond satisfactorily to any request, query, or complaint you may have in respect of your personal information, but if you are dissatisfied with our response and wish to make a formal complaint, or if you simply wish to learn more about your rights, you can contact the Caymans Islands Ombudsman:</p> <p style="text-align: center;">Ombudsman PO Box 2252, Grand Cayman KY1-1107, Cayman Islands https://ombudsman.ky/data-protection</p>