

**Soteria Trusts is a brand operated by Soteria Limited.**

Soteria Trusts (the “Brand”) is a brand operated by Soteria Limited (the “Company”). The Company recognises its responsibilities regarding the collection, holding, processing, use and transfer of personal data under the Personal Data (Privacy) Ordinance (Cap. 486) (“PDPO”). Personal data will be collected only for lawful and relevant purposes. All practicable steps will be taken to ensure the accuracy and security of personal data held by the Company and to prevent unauthorised or accidental access, processing, erasure, loss or use.

The Company forms part of a wider group of affiliated businesses (Business Class Group) providing estate planning, trust, retirement planning, wealth protection, insurance and financial-planning services.

If you do not provide the personal data requested, the Company may be unable to provide the information, products or services you require or to process your request.

**Purpose of Collection**

From time to time, the Company may collect personal data in connection with the operation of the Soteria Trusts brand. The data may be used, stored, processed, transferred, disclosed or shared for the following purposes:

1. Offering, providing and marketing products or services of Soteria Trusts, Soteria Limited, their affiliates or business partners, and administering, maintaining, managing and operating those products or services.
2. Processing and evaluating applications or requests for products or services offered through Soteria Trusts, Soteria Limited or their affiliates.
3. Providing ongoing services, including the administration of relevant arrangements, instructions, accounts, policies or structures.
4. Handling any claim made by, against or otherwise involving you in relation to products or services provided by the Company or its affiliates, including the investigation of claims.
5. Evaluating your financial, estate-planning, trust, retirement-planning or related service needs, where relevant to your request.
6. Improving products and services for clients.
7. Conducting market research, analytics and statistical analysis.
8. Matching data held about you from time to time for any of the purposes stated in this PICS.
9. Making disclosures required by applicable law, rules, regulations, codes of practice or guidelines, or assisting law-enforcement, governmental or regulatory authorities in Hong Kong or elsewhere.
10. Conducting identity, due-diligence, compliance, credit or debt-collection checks where applicable.
11. Complying with the laws and regulatory requirements of any applicable jurisdiction.
12. Carrying out other services and administrative activities connected with the operation of Soteria Trusts and Soteria Limited.
13. Referring enquiries and clients to specialist advisers within our affiliated group (Business Class Group) where relevant to a client’s needs.
14. Any other purpose directly related to the purposes above.

**Transfer of Personal Data**

Personal data will be kept confidential. Subject to applicable law, it may be provided to:

1. Affiliates of Soteria Limited; relevant trustees, insurers, industry associations or federations, fund managers, financial institutions, professional advisers or service providers in Hong Kong or elsewhere. Where applicable, this may involve a transfer outside Hong Kong.
2. Affiliated Business Class Group companies and brands including but not limited to:
  - Soteria Limited
  - Platinum Financial Services Limited
  - Lifestyle Property International
  - Lifestyle Property Hong Kong
  - Lifestyle Brokers
  - Lifestyle Insurance
  - Other affiliated companies and brand from time to time

3. Any person involved in a claim made by, against or otherwise involving you concerning products or services provided by the Company or its affiliates.
4. Any agent, contractor, professional adviser or third party providing administrative, compliance, technology, communications, storage, payment, direct-marketing or other services to the Company or its affiliates, where that party is subject to appropriate confidentiality obligations.
5. Any actual or proposed assignee, transferee, participant or sub-participant of the Company's rights or business.
6. Any government department, law-enforcement body, court, regulator or other competent authority in Hong Kong or elsewhere.

Personal data will be transferred only for one or more of the purposes specified above or as otherwise permitted or required by law.

#### **Use and Provision of Personal Data in Direct Marketing**

The Company may wish to use your name, contact details, service interests, financial background and demographic data for direct marketing by post, email, telephone, messaging service or other permitted channel. Marketing may concern trust, estate-planning, Will-writing, retirement-planning, tax-planning, asset-protection and related professional services offered through Soteria Trusts, Soteria Limited, their affiliates or selected business partners.

The Company will obtain your consent, including an indication of no objection, before using or providing personal data for direct marketing where required by the PDPO. You may withdraw your consent at any time without charge by writing to the Data Privacy Officer at the address below or using the unsubscribe method provided in an electronic communication.

#### **Access and Correction of Personal Data**

Under the PDPO, you have the right to ascertain whether the Company holds your personal data, request access to a copy of it and request correction of inaccurate data. You may also request information about the Company's privacy policies and practices and the kinds of personal data it holds. The Company may charge a reasonable fee for processing a data-access request as permitted by law.

Requests should be made in writing to:

Data Privacy Officer, Soteria Limited  
Suite 1701-02, 17/F, 308 Des Voeux Road Central, Hong Kong  
Email: [info@soteriatrusters.com](mailto:info@soteriatrusters.com)

#### **Acknowledgement and Direct Marketing Choice**

I/We acknowledge that I/we have read and understood this Personal Information Collection Statement and have had the opportunity to consider how my/our personal data may be used and transferred by Soteria Limited in connection with the Soteria Trusts brand.

Unless I/we indicate otherwise below, I/we consent to the use of my/our personal data in accordance with this PICS, including for direct marketing where the required consent has been provided.

☐ I/We do not consent to the use of my/our personal data for direct marketing.

Name

Signature

Date

Capacity (if applicable)

Name

Signature

Date

Capacity (if applicable)