

Privacy Statement – Trinity Holdings International Ltd

Privacy Notice

Who We Are

Trinity Holdings International Ltd may gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

The registered office of Trinity Holdings International Ltd is at Bulevar Oslobođenja 297/7, Belgrade 11000, Serbia.

Our designated Data Protection Officer/Appointed Person is Managing Director and Founder of Trinity Holdings International, Nigel Nonkovic. Nigel Nonkovic can be contacted at nigel@trinityhi.com

Information That We Collect

Trinity Holdings International Ltd processes your personal information to meet our legal and contractual obligations, and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we may collect is:

- Name
- Date of Birth
- Information about your family
- Home Address
- Work Address Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- Information about your financial and investments preferences
- Information about your current financial situation and investments

We collect information in the below ways:

Via the online enquiry forms on our website, via our Financial Health Check Form and via emailed enquiries and correspondence.

How We Use Your Personal Data

Trinity Holdings International Ltd takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice. The purposes and reasons for processing your personal data are detailed below, one or more of these may apply:

1. We collect and store your personal data as part of formulating financial advice for you and your family (if relevant)
2. We collect your personal data as part of the process of making application for and completing the process of undertaking investments on your behalf and at your instruction

Your Rights

You have the right to access any personal information that Trinity Holdings International Ltd collects about you and to request information about:

- What personal data we hold about you
- The purposes of collecting this data
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Trinity Holdings International Ltd uses third-parties to provide the services as explained below, and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Trinity Holdings International Ltd uses the following third parties:

- Including international life offices and fund groups based in the Isle of Man and Guernsey.

Safeguarding Measures

Trinity Holdings International Ltd takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures in place, including:

- SSL, TLS, encryptions, restricted access, IT authentication, firewalls, anti-virus/malware etc.

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation ([GDPR](#)) but some other countries may not necessarily have the same high standard of protection for your personal data. Trinity Holdings International Ltd does not store any personal data outside the EU.

However, Trinity Holdings International Ltd may transfer limited personal data to clients who are outside of the EU for the below purposes: –

- To enable the fulfilment of contractual obligations with specific client and will only involve the personal data of employees and/or contractors whose details have been provided to Trinity Holdings International Ltd by the specific client.

Where we transfer personal information for the above reasons, we utilize the below safeguarding measures and mechanisms to ensure that your personal data is always safe and secure:

- Either encrypted email or secure file transfer systems as agreed with the client.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Trinity Holdings International Ltd however, as this information is required for us to provide you with our services or respond to your enquiries, we will not be able to offer some or all our services without it.

How Long We Keep Your Data

Trinity Holdings International Ltd only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. As an example, we are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years plus the current year, after which time it will be destroyed.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Lodging A Complaint

Trinity Holdings International Ltd only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Trinity Holdings International Ltd

Data Protection Officer: Nigel Nonkovic
Bulevar Oslobođenja 297/7, Belgrade 11000, Serbia
Email: nigel@trinityhi.com

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
Fax: 01625 524 510
Website Complaint Submission: <https://ico.org.uk/concerns/handling/>