



Privacy Notice

At Kattegat Limited we are committed to ensuring that the collection and maintenance of your personal information is fully compliant with the Personal Information Protection Act (2016) (“PIPA”).

Who We Are

The Kattegat family (“Kattegat Family”) includes: the Kattegat Trust, Kattegat Limited and its affiliated entities, Anholt Services USA, Inc. and Anglemont Financial Services Ltd. It also includes other trust entities and special purpose vehicles (SPV’s) that operate inside and outside of Bermuda. This Privacy Notice sets out how organisations within the Kattegat Family collect and process your personal information through your interactions with us.

Privacy Officer

Cora Lee Starzomski is the Privacy Officer and responsible for communicating with the Privacy Commissioner for Bermuda.

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us using the information set out in the contact details section.

What is Personal Information?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

How is your Personal Data collected and the types of Personal Data we collect?

We use different methods to collect data from and about you including through:

- Direct interactions: you may give us your identity and contact data by filling in forms or applications; and/or
- by providing other information via our website.

In addition to personal information provided to us by you through our staff or website, we may also collect information that is publicly available. The personal information we may hold includes, but is not limited to:

- Contact information, including name, telephone number, address and email address;
- Previous employment history; and/or
- Identification documents and details necessary to meet our legal obligations, such as those related to “know-your-customer” or immigration requirements.

How will the Personal Information be used?

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- It is required to fulfill a contract with you;
- It is required for us to comply with the law;
- It is necessary for our legitimate interests, or the legitimate interests of a third party; and/or
- You have provided us with your consent.

Your personal information may be used for the following purposes:

- To analyse and manage performance and generate internal reports;
- To establish and manage our relationship with you;
- To process applications for employment;
- To meet our regulatory, legal and professional obligations;
- For any other purposes for which we have your consent, save where the Kattogat Family or its third parties have a legitimate interest.

Your legal rights relating to your Personal Information

You will be asked to consent to the collection of personal information. You may at any time:

- Access your records by requesting a copy of the personal information we hold about you (commonly known as a “subject access request”);
- Correct any errors or omissions in the personal information we hold about you;
- Withdraw your consent. However, please note that where such a withdrawal of consent is incompatible with your obligations to us under your contract of employment or inconsistent with the law or our regulatory obligations such a withdrawal may be deemed to constitute notice of intention to terminate your contract.

Third Party Disclosure

We may have to share your personal data with the parties set out below for the purposes set out above:

- Legal and Audit
- Regulatory and Compliance
- Tax
- Financial Institutions such as Banks
- Corporate Service Providers
- Underlying Investments
- 3rd Party Vendors
- Grantees/Charitable Beneficiaries

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

Whenever we transfer your personal data out of Bermuda to countries that have laws that do not provide the same level of data protection as Bermuda law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented:

- We will only transfer your personal data to countries that have been deemed by Bermuda to provide an adequate level of protection for personal data;
- We may use specific standard contractual terms that give the transferred personal data the same protection as it has in Bermuda.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Retention of Personal Information

We retain your personal information only for as long as necessary to provide services or as required by law. Once your personal information is no longer needed, we securely dispose of or anonymize your information.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Contact Us

If you have any questions or concerns please contact our Privacy Officer, Cora Lee Starzomski:

Email address: cora@kattogat.bm

Postal address: Kattogat Limited, 11 Bermudiana Road, Mailboxes Suite 794, Pembroke HM 08, Bermuda

Telephone number: +1 441 400-7716
