

Privacy notice

25 February 2026

1. Important information and who we are

Purpose of this privacy notice

Barrule respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we collect and process your personal data and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

Controller

Barrule and Barrule Group refers to the group and affiliated companies consisting of Barrule Partners Group Limited, Barrule Trust Company Limited, Barrule Corporate Trustee Limited, Barrule Nominees Limited, North Barrule Limited, South Barrule Limited, Barrule Management Limited, Barrule Mediation Services Limited and any subsidiaries of these companies. Details can be found here <https://www.barrule.co/regulatory/>.

This privacy notice is issued on behalf of Barrule so when we mention "Barrule", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Barrule Group responsible for processing your data. We will let you know which entity will be the controller for your data when you engage us for services.

Barrule Partners Group Limited is the controller and responsible for this website.

CONTACT DETAILS

Full name of legal entity: Barrule Partners Group Limited

Email address: hello@barrule.co

Postal address: PO Box 312, St. Peter Port, Guernsey, GY1 3TE

Telephone number: +44 (0)1481 661444

You have the right to make a complaint about the processing of your personal data either with us, or with the Office of the Data Protection Commissioner in Guernsey via <https://www.odpa.gg/>.

Your duty to inform us of changes

It is important that the personal data we hold about you are accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** include first name, maiden name, last name, username, former name(s) or similar identifier, marital status, the identity of your spouse and the number of children you have and other family relationships, title, date of birth, place of birth, nationality, country of residence, your professional and employment information and history including events attended, politically exposed person status, identity number, passport number and sex.
- **Contact Data** include billing address, residential address, postal address, e-mail address, telephone numbers and other contact information.
- **Financial Data** include bank details and credit history, payment card details, income, details of your assets, source of wealth, shareholdings and beneficial interest in assets, tax related information, details of criminal convictions (where permitted by law) and disqualifications, history of bankruptcy and details of investigations by a formal official body and/or if you are named on a sanctions list, details of involvement in high-risk or high-profile activities.
- **Transaction Data** include details about payments to and from you and other details of services you have engaged us for.
- **Technical Data** include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** include your username and password, feedback and survey responses.
- **Usage Data** include information about how you use our website, products and services.
- **Marketing and Communications Data** include your preferences in receiving marketing from us and our third parties and your communication preferences.

This list is not exhaustive and Barrule may collect personal data not detailed above.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect **Special Categories of Personal Data** via our website. In certain circumstances we may be required to process Special Categories of Personal Data about

you (this may include details about your health records, or occupation permits, background searches, certificates of character and police clearances, data relating to criminal records or alleged criminal activity, race, ethnicity, religious or philosophical beliefs, political opinions and trade union membership). In such circumstances, the legal basis for processing of Special Categories of Personal Data may include explicit consent (where the Special Categories of Personal Data has been provided to Barrule by you for any of the purposes detailed in this Privacy Notice) or the processing being necessary for the compliance with a legal obligation.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How are your personal data collected?

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

- **Directly.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, e-mail, in person or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - subscribe to our publications;
 - request marketing to be sent to you;
 - return a survey; or
 - give us feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties (including someone acting as your representative) as set out below:
 - your employer, or any entity on which you are appointed as a corporate officer;
 - entities or structures in which you or someone connected to you has an interest;
 - your legal and/or financial advisers;
 - other financial institutions who hold and process your personal data;

- credit reference agencies and due diligence; risk assessment and screening service providers, financial crime databases and from the public domain;
- Technical Data from the following parties:
 1. analytics providers;
 2. advertising networks based inside **OR** outside the EU; and
 3. search information providers based inside **OR** outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside **OR** outside the EU.
- Identity and Contact Data from data brokers or aggregators based inside **OR** outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- **Other sources.** Where applicable, we may receive personal data about you through Closed Circuit Television and swipe card systems when you visit our offices in person.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via e-mail or text message. you have the right to withdraw consent to marketing at any time by contacting us at the “Contact Us” section found on our website: <https://www.barrule.co>.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To undertake compliance, customer due diligence and CDD checks such as identification verification checks to enable us to comply with our anti-money laundering obligations and for the purposes of crime prevention and fraud prevention	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary to comply with a legal obligation
To process and deliver your request for services from us including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information or purchased services from us or if you provided your details when you entered or registered for a survey and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Barrule Group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time via our website at <https://www.barrule.co>.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Barrule maintains continuous logs of its web server activity. These log files include the details of website users' IP address, browser type and page last visited, etc.. The log files are used to analyse how the website is being used by visitors and may be kept in an anonymised form for historical records.

The Barrule website uses hosted web analytics software. This hosted service is provided and managed by a third-party company, Wix.

Wix may transfer this information to third parties where required to do so by law, or where such third parties process the information on Wix's behalf. By using this website, you consent to the processing of data about you by Wix in the manner and for the purposes set out above.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us via the details set out at <https://www.barrule.co>.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties as may be required.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Where we transfer your personal information outside the European Economic Area (the "EEA"), we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information. This can be done in a number of different ways, for instance:

- the country to which we send the personal information may have been assessed by the European Commission as providing an "adequate" level of protection for personal data (this includes the UK, the Isle of Man, Jersey and Guernsey); or
- the recipient may have signed a contract based on standard contractual clauses approved by the European Commission.

In other circumstances, the law may permit us to otherwise transfer your personal information outside the EEA. In all cases, however, any transfer of your personal information will be compliant with applicable data protection law.

7. Data security

We have put in place appropriate security measures (including physical, electronic and procedural measures) to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal data are available in our retention policy, which can be requested from your usual relationship contact.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information. When digital records are erased, an offline archive may continue to exist within our data backup library. It is our policy not to restore any individual's data for which the "right to be forgotten" has been exercised.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

In certain circumstances, you have rights under data protection laws in relation to your personal data. You may have the:

Right of access and right of portability (transfer request) to personal data. You may request and receive copies of any personal data that Barrule may hold about you to be sent to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. The request (commonly known as a "data subject access request") should clearly identify who you are.

Right of rectification or erasure of personal data. You may request that any inaccuracies in the data we hold about you be corrected, and that any personal data that we hold about you which we do not have a legitimate reason to retain be erased.

You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your

fundamental rights and freedoms. you also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Right of restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Exercising your rights

If you wish to exercise any of the rights set out above, please contact us in writing and clearly identify who you are.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Glossary

BAILIWICK - means the Bailiwick of Guernsey.

AGGREGATED DATA - Aggregated Data is information gathered and expressed in a summary form for purposes such as statistical analysis, and so is not personal data for the purposes of data protection law.

DATA AGGREGATORS compile information from databases with intent to prepare combined datasets for data processing.

AUTOMATED TECHNOLOGY - means apps, websites and other software may automatically collect technical data about your equipment and/or use patterns.

DATA BROKERS - Companies that collect personal information about data subjects from a wide variety of sources for the purpose of reselling such information to their customers.

LAWFUL BASIS - means (i) the data subject has requested or given consent to the processing of personal data. Where personal data has been processed on the basis of consent (explicit or otherwise), the data subject has the right to withdraw consent at any time (without affecting the lawfulness of processing based on consent before its withdrawal), (ii) the processing is necessary for the conclusion or performance of a contract to which the data subject is a party, or made between the controller and a third party in the interest of the data subject, or to take steps at the request of the data subject prior to entering into such a contract, (iii) the processing is necessary to protect the vital interests of the data subject or any other individual who is a third party, (iv) the processing is necessary for purposes of the legitimate interest of the controller or a third party, (v) the processing is necessary for the exercise or performance by a public authority of a function that is of a public nature, or a task carried out in the public interest or (vi) the processing is necessary for the controller to exercise any right or power, or perform or comply with any duty, conferred or imposed on the controller by an enactment or an order or a judgment of a court or tribunal having the force of law in the Bailiwick.

LAW - means the General Data Protection Regulation or equivalent legislation in other jurisdictions.

LEGITIMATE INTEREST - means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

PERFORMANCE OF CONTRACT - means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

COMPLY WITH A LEGAL OR REGULATORY OBLIGATION - means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

YOU or **YOUR** means a data subject including but not limited to: all clients, beneficiaries, beneficial owners, trusts, foundations, companies, limited partnerships, collective investment schemes, and entity principals, directors, managers and/or officials, service providers, business referrers, intermediaries, internal and external third parties, users of our website, a parent or legal guardian of a data subject.

THIRD PARTIES

Internal Third Parties:

- Other companies in the Barrule Group acting as joint controllers or processors and who are based in Guernsey and provide IT and system administration services and undertake reporting.

External Third Parties:

- Service providers acting as processors based anywhere who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based anywhere who provide consultancy, banking, legal, insurance and accounting services.
- Tax and financial services regulators and other authorities acting as processors or joint controllers based in Guernsey or any other relevant jurisdiction, who require reporting of processing activities in certain circumstances.