

progeny

Progeny Privacy Notice

V7 May 2026

PROGENY – PRIVACY NOTICE

Progeny respects your privacy and is committed to protecting your personal data. This privacy notice will tell you how we look after your personal data and about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

Progeny is a trading style of Progeny Wealth Limited, Progeny Asset Management Limited, Progeny Law and Tax Limited, Progeny (Belgium) SA, Progeny (DIFC) Limited, Progeny (Hong Kong) Limited, and Progeny (SG) Pte. Ltd.

Progeny (“we”, “us” or “our”) is the controller and responsible for your personal data. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. Our DPO, The Data Protection People, can be contacted as follows:

Progeny DPO,
The Data Protection People,
The Tannery,
91 Kirkstall Rd,
Leeds,
LS3 1HS.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, in the first instance please contact privacy@theprogenygroup.com.

Our jurisdictions of operation include the United Kingdom, Belgium, Hong Kong, Singapore, and the Dubai International Financial Centre (DIFC) in the United Arab Emirates. For further information on the relevant data protection supervisory authorities in each location, please refer to section nine.

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 as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial & Legal Data** includes but is not limited to solvency, investments, pensions, protection, tax, mortgage, Wills, Trusts & property purchase data, bank accounts and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services we have provided you with.
- **Communications Data** includes recording your consent to process sensitive personal data or sharing preference.

We will only collect certain Special Categories of Personal Data about you where this is relevant and only with explicit your consent. (Special Categories of Personal Data includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health). We do not collect any client information about criminal convictions and offences.

Connected Individuals or Linked Accounts

We recognise that some individuals may be linked to your account in various ways. To respect your privacy and data-

sharing preferences, data is only shared with individuals to whom you have granted specific access rights.

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 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 IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data about you including, through direct interaction with you. You may give us your Identity, Contact, transaction and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: request our services; subscribe to our publications; request marketing information to be sent to you; or give us some feedback. We may in some cases consult credit reference agencies in order to assess your credit worthiness.

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 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 and where we need to comply with a legal or regulatory obligation.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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.

We will process your personal data:

- 1) As necessary for the performance of our contract with you when providing you with services:
 - a) To manage and perform the contract.
 - b) To allow you access to our client portals and share documents with you as necessary.
 - c) The sharing of information through the client portal will be limited to your dedicated service teams within Progeny. This means that the teams within each separate Progeny business will have access to your account and all documents contained therein.
 - d) To issue written or electronic communications that we feel are an important extension to the service we provide.
 - e) To update our records, including communication preference data; and
 - f) To trace your whereabouts and recover any debt.
- 2) As necessary for our own legitimate interests:
 - a) For good governance, accounting, managing and auditing our business operations.
 - b) Where we engage the services of external compliance consultants as part of governance and audit.
 - c) To monitor emails, calls, other communications

- and activities.
- d) To share identity and contact data to make introductions to other entities within the Progeny group of companies as requested by you. This may include international transfer of data to other jurisdictions where we operate.
 - e) For the provision of Personal Indemnity and other relevant insurance.
 - f) To search at credit reference agencies.
 - g) To comply with requests received from relevant third parties (including where we may act on behalf of the third party too); and
 - h) Where we are subject to regulatory approved Consultants/Assessors periodically checking our client files.
- 3) As necessary to comply with a legal obligation:
 - a) When you exercise your rights under data protection law and make requests.
 - b) For compliance with legal and regulatory requirements, requests and related disclosures.
 - c) For establishment and defence of legal rights.
 - d) For activities relating to the prevention, detection and investigation of crime.
 - e) To verify your identity, make fraud prevention and anti-money laundering checks; and
 - f) To monitor emails, calls, other communications and activities relating to your file.
 - 4) Based on your consent:
 - a) Share your data internally, so we are able to deliver the additional services we may include in our service proposition which is a core benefit of being a Progeny Client. This may include international transfer of data to other jurisdictions where we operate.
 - b) When we process any special categories of personal data at your request (e.g. racial or ethnic origin, data concerning health, religious or philosophical beliefs); and
 - c) When you request the disclosure of your personal data to other people or organisations outside of the Progeny Group.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical and Usage 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 services may be relevant for you. You will receive marketing communications from us if you have so requested or purchased services from us and you have elected to receiving marketing communications.

OPTING OUT

You can ask us to stop sending you marketing material or withdraw your consent to the sharing of your data at any time by emailing: enquiries@theprogenygroup.com

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 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 share your personal data with third parties as set out below:

- The Progeny group of companies (where we have a legitimate interest to do so).
- Sub-contractors and other persons who help us to provide services to you.
- Our legal and professional advisers, experts, auditors, lawyers, third party insurers and product providers.
- Fraud prevention agencies, credit reference agencies, debt collection agencies, personal search agencies, local authorities, lenders.
- Government bodies and agencies in the United Kingdom (e.g. tax authorities, the Information Commissioner's Office, HM Revenue & Customs, HM Land Registry) and other jurisdictions of operation.
- Courts, to comply with legal requirements and for the administration of justice.
- Other parties where necessary to protect the security and integrity of our business operations; and
- 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.

USE OF ARTIFICIAL INTELLIGENCE AND AUTOMATED TOOLS

We may use artificial intelligence (AI) and other automated tools to support the delivery of services to our clients and the operation of our business. This may include, for example, assisting with the preparation of draft client documentation and summaries, research and analysis, the organisation of information, the routing of enquiries, administrative support, and compliance-related processes.

Where such tools are used in connection with personal data, we only do so where appropriate technical and organisational measures are in place and in accordance with applicable data protection law, specifically the UK Data Protection Act 2018. Where we use AI and automated tools, this is done to support our internal teams, and not to make final decisions about you without meaningful human involvement.

Any output generated with the assistance of AI or similar tools that we use in connection with client services, regulatory processes, or communications is always subject to review by an appropriately qualified member of staff before it is relied upon or acted upon. Where relevant, we also take steps to ensure that any international transfers of personal data made in connection with the use of AI tools is subject to appropriate safeguards in accordance with applicable data protection law.

6. 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. 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 also 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.

7. 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. We retain all information relating to your file (including Contact, Identity, Financial and Transaction Data) for a prescribed period of time from the date of conclusion or longer if necessary for regulatory purposes. For further information on the data retention period of each jurisdiction, please refer to section nine. 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.

8. YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data and information about how it is processed.
- **Request correction** of the personal data that we hold about you if it is incomplete or inaccurate.
- **Request erasure** of your personal data (the "right to be forgotten").
- **Object to processing** of your personal data.
- **Request restriction of processing** of your personal data.
- **Request the transfer** of your personal data to a third party; and
- **Withdraw consent at any time** where we are relying on consent to process your personal data.

MAKING A DATA PROTECTION COMPLAINT

If you have concerns about how we collect, use or protect your personal data, you may make a complaint directly to us using the contact details above. We will acknowledge your complaint, investigate it as appropriate, keep you informed of progress where necessary, and tell you about the outcome without undue delay. If you remain dissatisfied, you may also complain to the Information Commissioner.

You also have the right to make a complaint at any time to the relevant supervisory authority for data protection issues as outlined in section nine. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

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. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may 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.

9. REGULATORY INFORMATION

United Kingdom

Supervisory Authority: Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Data Retention Period: 6 Years

Each UK entity within the Progeny group of companies is licenced with the ICO and can be found on the ICO register: <https://ico.org.uk/ESDWebPages/search>

Belgium

Supervisory Authority: Data Protection Authority

Website: <https://www.dataprotectionauthority.be/citizen>

Data Retention Period: 40 Years

Singapore

Supervisory Authority: Personal Data Protection Commission Singapore

Website: <https://www.pdpc.gov.sg>

Data Retention Period: 7 Years

Hong Kong

Supervisory Authority: Office of the Privacy Commissioner for Personal Data, Hong Kong

Website: <https://www.pcpd.org.hk/index.html>

Data Retention Period: 7 Years

Dubai International Financial Centre (DIFC)

Supervisory Authority: DIFC Commissioner of Data Protection

Website: <https://www.difc.ae/business/registrars-and-commissioners/commissioner-of-data-protection>

Data Retention Period: 6 Years

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