

# Personal Data Protection Policy

## Schedule - How Fiduchi uses your data

How Fiduchi uses client data	Our basis for doing so	Fiduchi's legitimate interests (where appropriate)
To operate and maintain our relationship with Clients	<ul style="list-style-type: none"> <li>Your consent;</li> <li>Contract fulfilment;</li> <li>Fiduchi's legitimate interest</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and growing our business;</li> <li>Obtaining your consent where needed for contact;</li> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
Delivering Fiduchi's services to our clients	<ul style="list-style-type: none"> <li>Contract fulfilment;</li> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
Marketing our products and capabilities to clients	<ul style="list-style-type: none"> <li>Your consent;</li> <li>Fiduchi's legitimate interest.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and growing our business;</li> <li>Obtaining your consent where needed for contact.</li> </ul>
Developing new service lines and products to better service clients	<ul style="list-style-type: none"> <li>Contract fulfilment;</li> <li>Fiduchi's legitimate interest.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and growing our business;</li> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
To learn how our clients work with us and how we can improve this	<ul style="list-style-type: none"> <li>Fiduchi's legitimate interest</li> </ul>	<ul style="list-style-type: none"> <li>Developing and growing our business;</li> <li>Obtaining your consent where needed for contact;</li> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
To advise our clients about our services	<ul style="list-style-type: none"> <li>Your consent;</li> <li>Fiduchi's legitimate interest.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and growing our business;</li> <li>Obtaining your consent where needed for contact.</li> </ul>
Working with service providers who help Fiduchi operate its business	<ul style="list-style-type: none"> <li>Contract fulfilment;</li> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and growing our business;</li> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
Designing and testing new products and services for our clients	<ul style="list-style-type: none"> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and growing our business;</li> <li>Identifying the client base for our service lines;</li> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
Providing trust, company and administration services	<ul style="list-style-type: none"> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations;</li> <li>Contract fulfilment.</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
Making and delivering client payments, disbursements and fees on client accounts	<ul style="list-style-type: none"> <li>Contract fulfilment;</li> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
Risk management and corporate governance	<ul style="list-style-type: none"> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
Responding to complaints	<ul style="list-style-type: none"> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
Obeying applicable laws and regulations including the prevention of financial crime	<ul style="list-style-type: none"> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining proper practice and efficiencies in meeting our legal obligations.</li> </ul>
To properly, efficiently and lawfully operate the business of Fiduchi Group with proper regard to legal advice and monitoring, internal communications and corporate governance, audit and oversight.	<ul style="list-style-type: none"> <li>Fiduchi's legitimate interest;</li> <li>Fiduchi's legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>Maintaining proper practice and efficiencies in meeting our legal and commercial obligations.</li> </ul>
To exercise Fiduchi's contractual rights including the collection of monies owed to Fiduchi	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> </ul>	