



SWAN GROUP

Privacy Notice

Last Updated: November 2025

At Swan Group we take information security and privacy seriously. We are proud to hold **Cyber Baseline** and **Cyber Assurance Level 1 and 2 certifications**, demonstrating that we have implemented strong technical, administrative, and procedural controls to safeguard the information entrusted to us.

With the **Personal Information Protection Act 2016 (PIPA)** now in full effect across Bermuda, we are committed to maintaining full compliance with its principles of fairness, accountability, and transparency in the collection, use, and protection of personal information. Our internal policies, staff training, and security measures ensure that data is managed responsibly and that individuals' privacy rights are always respected.

Swan Group ("Organisation") is a collection of companies that operates and manages the real-estate assets; 141 Front Street, 19 Par-La-Ville and Swan Building, Castaways (Properties) and corporate financial assets of the Sir John Swan Trust as well as manages the personal financial assets of the Sir John and Lady Swan Trust and Almanix Trust. This privacy notice applies to all the companies and trusts in Swan Group listed below:

Sir John Swan Trust
Sir John and Lady Swan Trust
Almanix Trust
Swansea Holdings
Atlantis Leasing Ltd.
Challenger Banks Ltd.
City Holdings Ltd.
Compass Point Ltd.
Cygnus Advisory Ltd.
Grape Bay Paget Ltd.
John W. Swan Ltd.
JWS Real Estate Ltd.
Seon Place Ltd.
Swanoco Holdings Ltd.
Warner Holdings Ltd.

Swan Group is committed to protecting the personal information of its employees, clients, stakeholders, and any other individual who engage our services. We are committed to only using personal information in a fair and lawful manner, and in compliance with Bermuda's Personal Information Protection Act 2016 (PIPA). This Privacy Notice is made readily available to comply with privacy notice requirements under PIPA.

Our Collection and Use of Personal Information

We collect, use, and disclose personal information solely for legitimate business purposes, and only for the purposes for which it was collected. Such purposes include but not limited to:

- € Providing residential brokerage services
- € Maintaining business operations and meeting regulatory and compliance obligations.
- € Processing payroll and benefits administration.
- € Maintaining the security of our buildings, employees and tenants

Swan Group does not collect personal information without expressed consent, except where required by law or to carry out duties in line with contractual obligations.

Types of Information We Collect and Receive

We collect, receive, and use personal information relevant to our business operations and to provide our services. The type of personal information collected is dependent on the service being provide, as outlined below:

1. **Residential Real Estate Sales and Leasing:** First name, surname, email address, phone number, home address, passport information, source of wealth information.
Purpose: To comply with Bermuda's regulatory framework for the sale of real estate as outlined by the Superintendent of Real Estate and ensure the identity of tenants entering leases.
2. **Real Estate Broker and Salesperson's Licensing:** First name, surname, email address, phone number, current and employment information, nationality/citizenship, immigration status, criminal Records / police checks, education / professional qualifications.
Purpose: to fulfil the requirements need to obtain real estate licenses.
3. **Compliance:** First name, surname, past email address, phone number, past and current employment information, nationality/citizenship, TIN numbers, professional qualifications.
Purpose: To meet regulatory and compliance obligations.
4. **Payroll & Benefits Management:** First name, surname, email address, nationality/citizenship, phone numbers, banking details, physical addresses, date of birth, beneficiary information, dependent information, past and current employment.
Purpose: To perform the services required relating to payroll and benefits management.
5. **CCTV Cameras:** Image and likeness
Purpose: To protect the safety and security of our buildings, staff, and tenants.

Where We Disclose Personal Information

Some service providers we use may have access to an individual's personal information. These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies. These vendors include:

Service Provider	Justification
HSBC, UBP, Bank of Butterfield and Morgan Stanley	Regulators require banks to adhere to compliance requirements with regards to AML, KYC and ATF and to ensure all transactions are within the law and transparent.
Acumen	3 rd Party Payment provider subject to financial regulation
Conyers, Beesmont, Continental Management	Legal and Corporate Service Providers are required by BMA to due to diligence on ultimate beneficial owners of entities.
Government of Bermuda	To facilitate permit applications and to meet legal obligations, including payroll and benefits and general reporting.

Exercising Your Rights Under PIPA

Under Bermuda's PIPA, individuals have the right to:

- ✘ Access their personal information.
- ✘ Request corrections to inaccuracies.
- ✘ Request the deletion of personal information no longer required.

To exercise your rights under PIPA, please submit a written request to the Privacy Officer, Alison Swan at alison@swangroup.bm. Your request must include sufficient information to identify the personal information that is relevant to your request as well as all necessary contact information for us to respond to your request.

Please note that requesting for your personal information to be deleted may result in the termination of our services, or at least the aspects of the services relevant to the information being deleted.

The Privacy Officer will confirm receipt of all PIPA requests within 4 business days. Once receipt has been confirmed, requests will be processed within a reasonable timeframe – usually not exceeding 45 days (depending upon the nature and complexity of your request).