



# TROWBRIDGE GLOBAL

## Privacy Notice

### 1 Background

Last updated: [May 12, 2025].

This notice tells you how we look after your personal data when you visit our websites at <https://www.trowbridge.ca/>, <https://www.trowbridgeglobal.de/> and <https://www.trowbridgeglobal.uk/>, or any of our sub-domains (collectively referred to as the “Website”), when you enter into a contract for the provision of our tax advisory or accountancy services ( “Services”), where you are a prospective customer of our business, or where you are another type of business contact, such as a supplier or service provider to our business.

This notice sets out what information we collect about you, what we use it for and whom we share it with. It also explains your rights and what to do if you have any concerns about your personal data.

We may sometimes need to update this notice, to reflect any changes to the way the Goods and Services are provided or to comply with new business practices or legal requirements. You should check this Privacy Notice to see whether any changes have occurred.

### 2 Who we are and other important information

We trade under the name “Trowbridge Global”. The legal entities that may hold and be responsible for the management of your personal data are:

Trowbridge Professional Corporation, a corporation registered in Ontario, Canada, with offices at 1 King Street West, Suite 1201, Toronto, ON M5H 1A1  
Tel: +1 416-214-7833 Email: [info@trowbridge.ca](mailto:info@trowbridge.ca)

Trowbridge Global Limited is a limited company registered in England and Wales with offices at Stanley Building, 7 Pancras Square, King's Cross, London, N1C 4AG.

Tel: +44 (0)20 3642 5245 Email: [clientsupport@trowbridgeglobal.uk](mailto:clientsupport@trowbridgeglobal.uk)

Trowbridge Global Limited is registered with the Information Commissioner’s Office (ICO), the UK regulator for data protection matters, under number ZA924876.

Trowbridge International Tax Services GmbH a company registered in Frankfurt, Germany, with offices at Taunusanlage 8 (WeWork Entrance) 60329 Frankfurt Am Main, Germany.

Tel: +49 069-4908-6303 Email: [clientsupporteu@trowbridgeinternationaltax.de](mailto:clientsupporteu@trowbridgeinternationaltax.de)

Trowbridge US Holdings LLC a company registered in [Delaware] with offices at 1209 N

Orange St, Wilmington, County of New Castle, 19801 Email: [info@trowbridge.ca](mailto:info@trowbridge.ca)

Trowbridge Outsourcing Services India LLP a company registered in India with offices at B 17, Privilion, Behind Iscon Temple, Ambli Bopal Road, S .G.Highway Ahmedabad Ahmedabad GJ 380054 Email: [info@trowbridge.ca](mailto:info@trowbridge.ca)

(collectively referred to as “**Trowbridge**”, “**we**”, “**us**” or “**our**”).

Depending on where you are located (and which Trowbridge entity you are doing business with, if any), you may be subject to jurisdiction specific laws and regulations. This privacy notice is intended to provide you with the information that we are required to provide you with, wherever you are located. We will look after your personal data carefully wherever you are located, but you may not be able to exercise all of the rights set out below if you are resident in a jurisdiction where such rights do not exist.

### **3 The information we collect about you**

**Personal data** means any information which does (or could be used to) identify a living person.

We have set out the types of personal data that we collect and where we receive it from below.

Type of Personal Data:

- Identity Data – your first and last name and title, job title, company name, Any further personal data that you choose to provide in your initial enquiry, Any further personal data that you choose to provide during subsequent discussions whether by phone, email or letter, PEP (Politically Exposed Persons) status, SIP (Special Interest Person) status, Unique identification number such as National Insurance (NI) number, Unique Taxpayer Reference (UTR) or social security number.
- Contact Data – your email address, telephone numbers, home address.
- Financial and Tax Data – information about your financial and transaction records, tax identification, tax records and other financial and tax related data where you provide this, or where we create this for you, in connection with the performance of our Services.
- Location Data – your physical location, addresses and your device location if you log into our systems remotely.
- Feedback – information and responses you provide when completing surveys and questionnaires
- Photo and Image Data – images, videos and audio that we may collect through our interactions with you.
- Marketing and Communication Data - includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Technical Data - internet protocol (IP) address, browser type and version, time zone setting and generic location, browser plug-in types and versions, operating system and platform on the devices you use to access our systems.

- Usage Data - information about how you use our systems, including our Website and any platform, API or software that we may provide you with access to, or integrate our systems with.

**Sensitive information:**

- We do not intend to collect or process sensitive information and we request that you do not provide sensitive information to us unless this is strictly necessary for us to perform our services.
- Sensitive information will only be processed by us where we have your consent to the processing, which can include your provision of the sensitive information to us for a specified purpose.

We collect and process information about you and your interactions with us, for example:

- when you inquire about, purchase, or request information about, our legal services, call us, or otherwise visit our website and we provide you or your employer or legal representative with legal advice;
- when you subscribe to (or do not opt out of) our online services, or our mailing list;
- when you attend one of our events;
- whenever you interact with us, including over the phone, through our online enquiry form, email, social media channels, or post, or leave a review of the services we have provides to you;
- we may also collect personal information from third parties such as parties who have connected us to you by way of a referral; and
- we may use publicly available sources or third-party vendors to allow us to maintain the accuracy of contact details we hold for you or provide missing information

**4 How we use your information**

We are required to identify a legal justification (also known as a lawful basis) for collecting and using your personal data. There are six legal justifications which organisations can rely on.

The most relevant of the lawful bases to us are where we use your personal data to:

- fulfil our contract with you
- pursue our legitimate interests (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy)
- comply with a legal obligation that we have
- do something for which you have given your consent

The table below sets out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed in the table, we will update our privacy notice.

| Lawful Basis                | Purpose for using your personal data   |
|-----------------------------|--|
| <b>Contract</b>             | Where we have a contract with you, as an individual, and the processing is carried out: <ul style="list-style-type: none"> <li>• To perform our Services.</li> <li>• To otherwise administer or perform our contract with you.</li> <li>• To process your payment information in connection with any contract we have with you.</li> <li>• To send you updates about the Services.</li> </ul>  |
| <b>Legal Obligation</b>     | Where we are under a legal obligation to conduct the processing, including: <ul style="list-style-type: none"> <li>• Recording your preferences (e.g. marketing) to ensure that we comply with data protection laws.</li> <li>• Where we send you information to comply with a legal obligation (e.g. where we send you information about your legal rights).</li> <li>• Where we are required to file information with, or provide notifications to, public authorities.</li> </ul>   |
| <b>Legitimate Interests</b> | Where using your information is necessary to pursue our legitimate business interests to: <ul style="list-style-type: none"> <li>• to provide our services to an organisation with which you are connected in some manner;</li> <li>• ensure the proper functioning of, improve and optimise our Website; and</li> <li>• to protect our business and defend ourselves against legal claims.</li> </ul> Where we use your information for our legitimate interests, we have assessed whether such use is necessary and that such use will not infringe on your other rights and freedoms. |
| <b>Consent</b>              | <ul style="list-style-type: none"> <li>• Where you have provided your consent to with the use or sharing of your information.</li> <li>• Where you have consented to receive marketing material from us.</li> </ul>  |

We may anonymise the personal data we collect (so it can no longer identify you) and then combine it with other anonymous information so it becomes aggregated data. Aggregated data helps us identify trends (e.g. what percentage of users responded to a specific survey). Data protection law does not govern the use of aggregated data and the various rights described below do not apply to it.

Where we need to collect your personal data (for example, in order to fulfil a contract we have with you), failure to provide us with your personal data may mean that we are not able to provide you with the services. Where we do not have the information required about you to fulfil an order, we may have to cancel the service ordered.

## 5 When we send you marketing messages

We may send you marketing messages where you have consented, or where we are otherwise not legally prohibited from doing so.

You can opt out of receiving marketing messages from us at any time. Just let us know at [info@trowbridge.ca](mailto:info@trowbridge.ca). Opting out of marketing will not affect our processing of your personal data in relation to any order you have with us and where we are required to use your personal data to fulfil that order or provide you with certain information.

## 6 Who we share your information with

We share (or may share) your personal data with:

- **Our affiliated entities:** this includes the entities listed above, and such holding companies and subsidiaries as each of the entities listed above may have from time to time. Where such entities are not in the same location as the entity that collected your data, we will deal with such overseas transfer as set out below.
- **Our personnel:** our employees (or other types of workers) who have contracts containing confidentiality and data protection obligations.
- **Our supply chain:** other organisations that help us provide our Goods. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations.
- **Regulatory authorities:** such as federal or local governments, regulatory or self-regulatory authorities, or other administrative agencies, such as the UK HM Revenue & Customs, Internal Revenue Service (IRS), Financial Crimes Enforcement Network (FinCen), Information Commissioner's office (ICO), Canadian Revenue Agency (CRA), Chartered Institute of Taxation (in case of AML audit)
- **Our professional advisers:** such as our accountants or legal advisors where we require specialist advice to help us conduct our business.
- Any actual or potential buyer of our business.

If we were asked to provide personal data in response to a court order or legal request (e.g. from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response.

## 7 Transfer of Personal Data overseas

As we are a global accountancy firm, we may disclose your personal information to our entities in locations from where we provide legal and other services.

We may disclose personal information across borders to third parties so that they may perform services for us, on our behalf, or in the context of the provision of our Services to you.

We may also disclose your personal information across borders to others outside our group of companies where:

- it is necessary for the provision of our Services to you;
- we are required or authorised by law to do so;
- you have expressly consented to the disclosure; or
- we are otherwise permitted to disclose the information under any relevant privacy regulations.

If your personal information has been collected by, or provided to Trowbridge Global Limited or Trowbridge International Tax Services GmbH, we will only transfer information out of the UK or EEA where we have a valid legal mechanism in place to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located (e.g. by using contracts approved by the European Commission or UK Secretary of State).

If you access our Website or enter into a contract for our Services whilst abroad then your personal data may be stored on servers located in the same country as you or your organisation.

## **8 How we keep your information safe**

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- access controls and user authentication (including multi-factor authentication);
- internal IT and network security;
- regular testing and review of our security measures;
- staff policies and training;
- incident and breach reporting processes;
- business continuity and disaster recovery processes;

If there is an incident which has affected your personal data and we are the controller, we will notify the regulator and keep you informed (where required under data protection law). Where we act as the processor for the affected personal data, we notify the controller and support them with investigating and responding to the incident.

If you notice any unusual activity on the Website, please contact us at [info@trowbridge.ca](mailto:info@trowbridge.ca).

## **9 How long we keep your information**

Where we act as the controller, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To decide how long to keep personal data (also known as its retention period), we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm to you if an incident were to happen, whether we require the personal data to achieve the purposes

we have identified or whether we can achieve those purposes through other means (e.g. by using aggregated data instead), and any applicable legal requirements (e.g. minimum accounting records for HM Revenue & Customs).

We may keep Identity Data, Contact Data and certain other data (specifically, any exchanges between us by email or any other means) for up to seven years after the end of our contractual relationship with you.

If you browse our Website, we keep personal data collected through our analytics tools for only as long as necessary to fulfil the purposes we collected it for.

If you have asked for information from us or you have subscribed to our mailing list, we keep your details until you ask us to stop contacting you.

## 10 Your legal rights

You have specific legal rights in relation to your personal data, which may vary by jurisdiction. The following list sets out your legal rights if you are resident in the European Economic Area or in the UK. We will do our best to comply with the below, even where we are not legally required to do so. If you wish to exercise any of the rights listed below, please contact [dpt@trowbridge.ca](mailto:dpt@trowbridge.ca).

- **Access:** You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law.
- **Correction:** You can ask us to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.
- **Deletion:** You can ask us to delete or remove your personal data if there is no good reason for us to continue holding it or if you have asked us to stop using it (see below). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.
- **Restriction:** You can ask us to restrict how we use your personal data and temporarily limit the way we use it.
- **Objection:** You can object to us using your personal data if you want us to stop using it. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.
- **Portability:** You can ask us to send you or another organisation an electronic copy of your personal data.

- **Complaints:** If you are unhappy with the way we collect and use your personal data, please contact us using the applicable contact details set out above. We will do our best to resolve your concerns. If we are unable to do so, you may be able to complain to a regulator, depending on your location:

If you are resident in Canada you can complain to the Office of the Privacy Commissioner of Canada.

If you are resident in the United Kingdom you can complain to the UK Information Commissioner's Office.

If you are resident in the European Economic Area you can complain to the Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI).

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is manifestly unfounded or excessive. We may charge a fee where we decide to proceed with a request that we believe is unfounded or excessive. If this happens we will always inform you in writing.

## COOKIE POLICY

Cookies will typically be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serve a number of purposes.

On our website, a notification banner will appear allowing you to manage your consent to collect cookies (cookie banner). Below is a summary of the categories of cookies collected on our websites, and how your consent may impact your experience of certain features as you navigate those websites:

- **Strictly necessary cookies:** Strictly necessary cookies are essential in order to enable users to move around the website and use its features, such as accessing secure areas of the website. These cookies must be enabled or the site will not function, and cannot be blocked.
- **Performance cookies:** Performance cookies are cookies used to gather data to enhance the performance of a website. You can manage your consent for performance cookies using the cookie banner, or by updating your browser's settings (often found in your browser's Tools or Preferences menu) to not accept cookies.
- **Functionality cookies:** Functionality cookies are used to remember customer selections that change the way the site behaves or looks. You may opt-out of these cookies, but it will impact your experience on the website, and you may need to repeat certain selections each time you visit. You can manage your consent for functionality cookies using the cookie banner, or by updating your browser's settings (often found in your browser's Tools or Preferences menu) to not accept cookies.

- **Targeting cookies or advertising cookies:** Targeting cookies are used to deliver content relevant to your interests. They are also used to limit the number of times you see certain marketing materials, as well as help measure the effectiveness of those marketing materials. If you do not provide consent for targeting cookies, your computer or internet-enabled device will not be tracked for marketing-related activities.

You can manage your consent for targeting cookies using the cookie banner, or by updating your browser's settings (often found in your browser's Tools or Preferences menu) to not accept cookies.

Although most browsers automatically accept cookies, you can choose whether to accept cookies via the cookie consent banner or your browser's settings (often found in your browser's Tools or Preferences menu). If you wish to revoke your selection, you may do so by clearing your browser's cookies, or by updating your preferences in the cookie banner. Further information about managing cookies can be found in your browser's help file or through sites such as [www.allaboutcookies.org](http://www.allaboutcookies.org).

Below is a list of the types of cookies used on our web sites:

| Purpose                            | Description  | Type & Expiry   |
|------------------------------------|--|---|
| Performance (i.e., User's Browser) | Our website is built using common internet platforms. These have built-in cookies which help compatibility issues (e.g., to identify your browser type) and improve performance (e.g., quicker loading of content).                                      | Session, deleted upon closing the browser, or persistent. |
| Security Cookies                   | If you register for access to a restricted area, our cookies ensure that your device is logged for the duration of your visit. You will need your username and password to access the restricted areas.  | Session, deleted upon closing the browser, or persistent. |
| Site Preferences                   | Our cookies may also remember your site preferences (e.g., language) or seek to enhance your experience (e.g., by personalizing a greeting or content). This will apply to areas where you have registered specifically for access or create an account. | Session, deleted upon closing the browser, or persistent. |
| Analytical                         | We use several third-party analytics tools to help us understand how site visitors use our web site. This allows us  | Persistent, but will delete automatically after two years |

|                |  |  |
|----------------|--|--|
|                | to improve the quality and content on our website for our visitors. The aggregated statistical data cover items such as total visits or page views, and referrers to our web sites.  | if you no longer visit our website   |
| Social sharing | We use third party social media widgets or buttons to provide you with additional functionality to share content from our web pages to social media web sites and email. Use of these widgets or buttons may place a cookie on your device to make their service easier to use, ensure your interaction is displayed on our web pages (e.g. the social share count cache is updated) and log information about your activities across the Internet and on our web sites. We encourage you to review each provider's privacy information before using any such service. For further details on our use of social media widgets and applications, see below. | Persistent, but will be deleted automatically after two years if you no longer visit any of our website. |

Other third-party tools and widgets will be used on our individual web pages from time to time to provide additional functionality. Depending on how you set your preferences in your browser and/or the cookie banner, use of these tools or widgets may place a cookie on your device to make their service easier to use, and ensure your interaction is displayed on our webpages properly.

Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we will obtain other identifiers including IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends, and not to identify individual visitors.