

PRIVACY POLICY

Mary Oppenheimer Daughters (UK) Limited (Company No. 10465715)

Effective Date: 01 April 2026 | Last Updated: 25 March 2026

1. Who We Are

This website, oppenheimer-daughters.com (the “Website”), is operated by Mary Oppenheimer Daughters (UK) Limited, incorporated in England and Wales (Company No. 10465715), with its registered office at 33 Welbeck Street, London, W1G 8LX. For the purposes of data protection law, we are the controller of any personal information collected through the Website. Our group also includes entities in the Isle of Man and South Africa; if you interact with those entities separately, they act as independent controllers for the information they process.

This policy sets out how we collect and use personal information through the Website, and the rights available to you. It complies with the UK General Data Protection Regulation (“UK GDPR”), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003, the Isle of Man Data Protection Act 2018, and the Protection of Personal Information Act 4 of 2013 (“POPIA”). This policy should be read together with our Terms of Use and Disclaimer and Cookie Policy, each of which is available on the Website.

If you do not agree with these practices, please do not submit your personal information to us. If you choose not to, we may not be able to respond to your enquiry.

2. What We Collect and Why

Information you provide. If you use the contact form on the Website, email us, or otherwise correspond with us, we collect your name, email address and the content of your message. We use this to respond to your enquiry and, if relevant, to take pre-contractual steps. Our lawful basis is Article 6(1)(f) of the UK GDPR (our legitimate interest in responding to communications) or Article 6(1)(b) (pre-contractual steps at your request); under POPIA, Section 11(1)(f) or Section 11(1)(b). If your enquiry leads to a business relationship, we may retain your details for the duration of that relationship; otherwise, we delete enquiry data within 12 months of the last interaction.

Technical and cookie data. When you visit the Website, we automatically collect your IP address, browser type, device, operating system, pages visited and the dates and times of your visits. We use strictly necessary cookies (which do not require consent) to operate the Website, and analytics cookies (set only with your consent) to understand how the Website is used. When you first visit, a cookie consent banner will ask you to accept or reject non-essential cookies; you can change your preference at any time. Our lawful basis for analytics is Article 6(1)(a) (consent). Analytics and cookie data is retained for no longer than 12 months. We do not use cookies for advertising or cross-site tracking.

You provide information voluntarily. If you choose not to, we will not be able to respond to your enquiry.

3. Who We Share It With

We do not sell your personal information. We share it only when necessary: with our website hosting and IT service providers (who act as processors under written agreements); with other group entities if your

enquiry is relevant to them; and with law enforcement, regulators or tax authorities if required by law. We do not permit processors to use your information for their own purposes.

4. International Transfers

Your information may be transferred between the UK, the Isle of Man and South Africa. The Isle of Man is recognised as adequate under the UK GDPR. For any other transfers from the UK, we use safeguards approved by the ICO (such as the UK International Data Transfer Agreement). Transfers from South Africa comply with Section 72 of POPIA.

5. Security

We protect your personal information with encryption in transit, access controls, and regular security reviews. No system is entirely secure, and we cannot guarantee that a breach will never occur. If a breach is likely to pose a risk to your rights, we will notify the relevant supervisory authority within 72 hours under the UK GDPR and, where the risk is high, notify you directly. Under POPIA, we will notify the Information Regulator and affected individuals as soon as reasonably possible.

6. Your Rights

Under the UK GDPR, you may request access to, correction of, or deletion of your personal information; restrict or object to its processing; request data portability; or withdraw consent at any time. Under POPIA, you have equivalent rights, including the right to be notified of collection (Section 18), the right to object (Section 11(3)), and the right to institute civil proceedings (Section 99). To exercise any right, please contact us (Section 9). We may verify your identity before acting. We will respond within one calendar month (UK/IOM) or a reasonable period (POPIA). No fee applies unless a request is manifestly unfounded or excessive.

7. Media and Unsolicited Enquiries

We do not respond to unsolicited media enquiries through the Website and do not confirm or deny the identities, activities or whereabouts of individuals associated with the family office. Our staff are trained to identify social engineering and pretexting attempts. Personal information in unsolicited enquiries is deleted within 12 months unless there is a lawful reason to retain it.

8. General

Children. The Website is not intended for children under 13 in the UK; under 18 under POPIA. We do not knowingly collect their information. If you believe a child has provided us with their data, contact us and we will delete it.

Changes. We may update this policy to reflect changes in practice or law. Material changes will be posted on the Website. Previous versions are available on request.

Governing law. This policy is governed by the laws of England and Wales, without prejudice to mandatory data protection rights under the laws of your jurisdiction of residence, POPIA, or Isle of Man law.

Third-party links. The Website may link to third-party websites whose privacy practices differ from ours. We are not responsible for those practices; review their privacy notices before using those sites.

9. Contact Us

If you have questions about this policy or wish to exercise your rights:

Mary Oppenheimer Daughters (UK) Limited

Email: enquiries@oppenheimer-daughters.com

South African Information Officer (Section 55, POPIA):

Mary Oppenheimer Daughters (Pty) Limited

Email: enquiries@oppenheimer-daughters.com

If you are not satisfied with our response, you may complain to the relevant authority: the ICO (ico.org.uk, 0303 123 1113); the Isle of Man Information Commissioner (inforights.im, +44 1624 693260); or the Information Regulator of South Africa (info regulator.org.za, complaints.IR@justice.gov.za).
