IGUAKO CAPITAL · Regulatory notice guide

Data Protection Notice: guide

TOPIC	JURISDICTIONS	GROUP POLICY
Data Protection Notice	28	Data Protection and Privacy

REVIEWED

June 2026

Introduction

IGUAKO Capital holds personal data because regulation, contract and prudent underwriting require it, and for no other reason. This notice explains what the firm collects, the basis on which it is held, who else sees it, how long it is kept, and what an individual can require of the firm. It is issued under the group Data Protection and Privacy policy, IGC-DT-001. Four principles of the Ethical Technology Charter govern it. Every dataset has a documented origin and a lawful basis. Nothing is inferred about a person beyond what the mandate needs. A client can see which decisions were model-assisted. Any client may require that a person decide instead.

What is held, and on what basis

The the jurisdiction entity holds identification documents, ownership and control records, tax residence declarations, settlement instructions, transaction and valuation records, correspondence, meeting notes and the access logs of the client portal. Each processing activity appears in the group processing register with its origin, its lawful basis, its retention period and a named owner. The firm buys no personal data from data brokers, builds no behavioural profile of a client, and draws no inference about an individual that the mandate does not require. Client data is never sold, and it is never used to train a model that serves another client.

What an individual can require

Any individual whose data the firm holds may ask what is held, ask for a copy, ask for a correction, object to a particular use, or ask for deletion where no retention rule requires the record to be kept. Requests go to privacy@iguako.tech and are answered within 30 days, without charge, whatever the size of the relationship. Where a decision has been assisted by a model, the client may require that a person take the decision again, and the office in the serving office arranges that review within ten business days. A refusal is explained in writing and names the rule relied on.

Where the data goes and how long it stays

Client records sit on group systems and are copied to the regional hub that holds the jurisdiction records, under the intra-group transfer agreement binding every entity in the network. External processors, principally administrators, custodians and auditors, receive only what their function requires, and each is engaged on written terms carrying the same standard. Data is encrypted at rest and in transit, and access to client records is logged and reviewed monthly. Records are kept for seven years after a relationship ends and are then deleted on a scheduled cycle, not at the discretion of the desk that holds them.

The local regime and the reporting of breaches

Data protection law differs across the 28 domiciles. the local IGUAKO entity records in the group processing register which regime governs its files, which authority supervises that regime, and what the local rule requires beyond the group minimum.

A suspected breach is reported to the Group Data Protection Officer within 24 hours of discovery and assessed within 72 hours wherever in the network it occurs, and the the region regional compliance officer is told at the same time.

The provisions that apply in each jurisdiction are set out in the notice published for that domicile.

Closing

Personal data is a liability the firm carries on behalf of the people it belongs to, and it is treated that way. The firm collects the minimum the mandate needs, keeps it only as long as a rule requires, and answers for it through a named officer in every jurisdiction where it holds a file.

Jurisdictions and local entities

Jurisdiction	Local entity	Served from
Cayman Islands	IGUAKO Capital Holdings Ltd.	George Town
Bermuda	IGUAKO Capital (Bermuda) Ltd.	Hamilton
British Virgin Islands	IGUAKO Capital (BVI) Ltd.	Road Town
Bahamas	IGUAKO Private Wealth (Bahamas) Ltd.	Nassau
Barbados	IGUAKO Capital (Barbados) SRL	Bridgetown
Trinidad and Tobago	IGUAKO Capital (Trinidad and Tobago) Ltd.	Port of Spain
Curaçao	IGUAKO Capital (Curaçao) N.V.	Willemstad
United States	IGUAKO Capital Americas LLC	Palm Beach
Canada	IGUAKO Capital Canada Inc.	Toronto
Panama	IGUAKO Capital (Panamá) S.A.	Panama City
Brazil	IGUAKO Capital Brasil Participações Ltda.	São Paulo
Mexico	IGUAKO Capital México, S. de R.L. de C.V.	Mexico City
United Kingdom	IGUAKO Capital Advisory (UK) Limited	London
Ireland	IGUAKO Fund Management (Ireland) Limited	Dublin
Luxembourg	IGUAKO Capital Europe S.à r.l.	Luxembourg
Switzerland	IGUAKO Capital (Schweiz) AG	Zürich
Jersey	IGUAKO Trust Company (Jersey) Limited	St Helier
Guernsey	IGUAKO Capital (Guernsey) Limited	St Peter Port
Netherlands	IGUAKO Commercial Finance B.V.	Amsterdam

A work of institutional fiction by the Iguako Institute for Applied Unreality. No financial services are offered.

Jurisdiction	Local entity	Served from
United Arab Emirates	IGUAKO Capital (Gulf) Ltd.	Dubai
Qatar	IGUAKO Capital (Qatar) LLC	Doha
Bahrain	IGUAKO Treasury (Bahrain) B.S.C. (c)	Manama
Mauritius	IGUAKO Africa Holdings Ltd	Port Louis
South Africa	IGUAKO Capital South Africa (Pty) Ltd	Johannesburg
Singapore	IGUAKO Capital Asia Pte. Ltd.	Singapore
Hong Kong	IGUAKO Capital (Hong Kong) Limited	Hong Kong
Japan	IGUAKO Capital Japan K.K.	Tokyo
Australia	IGUAKO Capital Australia Pty Ltd	Brisbane

Colophon

IGUAKO Capital is a work of institutional fiction by the Iguako Institute for Applied Unreality (iguako.tech). This document is part of that work. It creates no rights or obligations, describes no licensed entity and is not an offer, a contract, a client record or advice.