

Introduction

Wealth Options Ltd. must comply with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Acts of 1988 - 2018. The purpose of this notice is to inform you of the data relating to you that we collect and use. Wealth Options Ltd. (referred to as 'we', 'us', 'our') is the Data Controller. Our registered address is 2A Elm House, Millennium Park, Naas, Co. Kildare, W91 NX86.

Scope

This policy extends to current, former and prospective clients and refers to both personal and sensitive data (henceforth equally referred to as 'personal data' unless otherwise stated) which is held in either manual or automated form. This policy should be read in conjunction with the associated Data Protection Policies.

Data Protection Principles

- (1) Data must be used lawfully, fairly and in a transparent way.
- (2) Data must be collected only for the valid purposes that we have clearly explained to you.
- (3) Data must be accurate and kept up to date.
- (4) The data we collect and hold, must be minimised.
- (5) Data should be stored for a limited period only.
- (6) Data should be kept securely.

The Personal Data We Collect

We may process the following personal data:

- Personal contact details e.g. name, address, contact number, email address, gender
- Broker specific information including name, address, business name, directors, principals, names, mobile numbers email addresses, qualifications, proof of ID, residency, contracts of engagement
- Other personal data processed for investment purposes e.g. date of birth, family status, salary, wealth, job title, PPS number, bank details, proof of ID (name/address)
- Marketing preferences
- Correspondence
- IP address, click data
- Monitored email/phone calls
- We may also collect the following sensitive data: - Health information

Why We Process Personal Data

- Provision of financial products and related services
- Responding to enquiries, complaints and feedback
- Sending circulars e.g. ezines, subscriptions to brokers
- Processing transactions and invoices
- Research and analysis
- Training and information security e.g. quality checking and phone call monitoring.
- Manage business operations in line with internal policies and procedures.
- Respond to requests for data access, correction and other personal data rights.
- Comply with applicable laws and regulatory obligations e.g. tax, health and safety and legal obligations.
- Establish and defend legal rights to protect the business.

Legal Basis For Processing

The primary bases we use to process personal data are:

- A. Processing necessary for the performance of a contract (e.g. broker contract)
- B. Processing necessary for Wealth Options Ltd. to pursue its legitimate interests
- C. Processing based on consent (e.g. marketing)
- D. Processing that is required under applicable law (e.g. Revenue/PRSI)

We process sensitive data based on one of the following conditions:

- Explicit consent
- For the establishment, exercise or defence of legal claims
- For insurance and pension purpose as per Article 50 of the DPA 2018 (Ireland)

Third Parties With Whom We Share Personal Data

As part of our role as Data Controller, we may need to share your data with one or more third parties to assist in the smooth running of our business. These Data Processors include:

- Banks (BOI, AIB) as required
- Software (Microsoft, Client Asset System, Sage) to store information securely
- Cloud Storage (BT data, Azure)
- Shredding (DGD Papers) to destroy documents securely
- Offsite File Storage (Kefron)
- Brokers, investment providers, banks, solicitors, estate executors, employers (previous Trustees) as advised by you
- Compliance and Accountancy services (O'Connor Sheedy & Co, Lane & Peacock (Ireland) Ltd.)

Other Recipients

For some processing activities, we are required to disclose data to 3rd parties who are not data processors acting on our behalf or data controllers on whose behalf we are working. These categories of recipients include:

- Tax Authorities (e.g. Irish Revenue Commissioners)
- Law enforcement (where required for the investigation, detection or prosecution of criminal offences)
- Regulators (The Central Bank)

Transfers Outside Of The EEA

From time to time we may make use of services provided by 3rd parties which may necessitate the transfer of personal data outside of the EU/EEA. In these instances, we will choose providers who process data on the basis of Model Contract Clauses or an Adequacy Decision from the European Commission.

Your Data Protection Rights

You have various rights under data protection law (subject to certain exemptions):

- Right to access your data
- Right to rectification
- Right to erasure
- Right to restriction of processing or to object to processing
- Right to data portability

In order to exercise any of the above rights, please contact our Data Protection Manager.

Further Information

If there is ever a data breach, we will adhere to our Data Breach Policy and follow the steps outlined in our Data Breach Procedure. We will only store your data for as long as is necessary and in accordance with our retention schedule. We require certain information from you in order to deliver our service e.g. your name and address etc. If you do not provide the personal data that we request from you it may hinder our ability to provide an effective service to you. We do not use automated decision making or profiling.

Questions & Complaints

Questions about how your personal data is processed can be forwarded to the Data Protection Manager info@wealthoptions.ie. If you would like further information you can request a copy of our General Data Protection Policy. You also have the right to lodge a complaint with the Data Protection Commissioner if you are unhappy with our processing of your personal data. Details of how to lodge a complaint can be found on the Data Protection Commission's website (www.dataprotection.ie) or by phoning 1890 252 231.

We reserve the right to amend this policy from time to time without prior notice.