

PRIVACY NOTICE FOR BCWM CLIENTS

We will request personal information from you on application forms, in meetings with you and from time-to-time we may request further information from you by email or letter. We use this personal data in order that we may provide the services agreed and for legal purposes such as carry out suitability assessments when providing advice and anti-money laundering checks. The legal basis for requesting this information is performance of a contract or for compliance with our legal obligations. We may share the information to the extent necessary with counterparties to transactions on your behalf, parties providing a services to us, on the understanding that they will keep the information confidential such as, regulatory bodies and other public bodies to whom we are obliged by law to disclose the information, in the case of a joint account, the other account holder, any other party to whom you have agreed we may disclose your information. You have a right of access, under data protection legislation, to the personal data that we hold about you. You may withdraw that right at any time.

The use and disclosure of your personal data may in certain circumstances involve the transfer of Information to countries outside Ireland, including countries both within and\outside the European Economic Area. Should your data be transferred outside the European Economic Area, we will require the entity to agree to provide the equivalent level of protection to personal data as applies under Irish law. Transfers to other countries will only be carried out: i for the purposes specified in the paragraph above; ii in accordance with your instructions and/or for purposes to which you have otherwise consented; or iii as otherwise required by law or regulation.

We may be required to collect, process, and keep sensitive personal data in relation to you. This might include information relating to your physical or mental health. Sensitive personal data will only be obtained and used where necessary to process your application, administer and assess your account or to comply with applicable law.

Where you provide us with personal information relating to other people, such as your spouse, children, employees, advisors, or other persons, you will ensure that the individuals in question are aware of the fact that we will hold information relating to them and that we may use it for the purposes outlined in this section.

You have the right to request a copy of all your personal data held by us, rectify such data, request the restriction of processing the data, object to the processing of the data, request that data be erased, or have any inaccuracies in your personal data corrected. You may also request that we transmit your personal data to another data controller, where this is technical feasible. You may make any of these requests by writing to us at Data Protection Manager, BCWM plc, 13 Upper Mount Street, Dublin D02 F207. The data protection manager in relation to personal data about you is BCWM's Head of Compliance and Risk. BCWM plc is the data controller.

We are obliged to retain client identification and client transaction records for six years from the end of the client relationship or the date of the last transaction which ever is the later. Other information may be retained for no longer than necessary for the purpose for which it was provided to us or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Your personal data will not be subject to automated decision making.

If you are unhappy with BCWM's handling of your personal data, you have the right to complain to the Data Protection Commission at Canal House, Station Road, Portarlington, R32 AP23, Co Laois

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