

# Client Privacy Notice

Effective from 17th May 2023

## Our Responsibilities

The GDPR Officer at Venture Wealth T/a Clan Wealth Management is responsible for ensuring that this notice is made available to customers before we collect and, or process their personal data.

All Employees of Clan Wealth Management who engage with customers are responsible for ensuring that the customer is aware of this notice and that the customer's consent to the processing of their data has been secured and documented.

## Personal Data

### What is Personal Data?

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

### What Personal Data does Clan Wealth Management hold about me?

The personal data that we may collect or process about you, our customer, can include the following: Contact information, including Name, Address, Phone and Email. Photo ID and Proof of Address. Health / Medical information, PPS number & Financial Information (Bank details, policy numbers).

### Why do we need your personal data?

Clan Wealth Management collects and uses your personal data to deliver the services which you have requested or subscribed to, for example retirement planning or financial management. All personal data given to us by you will be used only for the purpose for which you supply it and will be treated in accordance with General Data Protection

Regulations. We will only use your information so that we can provide a comprehensive service to you. This may include updates, advice and information relating to the services that you have requested or services which we believe would be beneficial to you.

Clan Wealth Management strives to improve the services and communications that we provide to our customers through the ongoing development of our IT systems and software. At times we use customer personal data to facilitate that development as follows:

- to gain a better understanding of our services, and to allow new product and service development.
- to tailor our services to allow us to meet customer needs.
- to allow us to predict trends and produce market insights.
- to undertake modelling to identify improvements customer reporting and service delivery efficiencies.
- to store, access, and backup information.

If you have given your consent to receive marketing material from us, we aim to provide you with information that is relevant and personal. By providing your personal data, and where you have agreed to receiving communications from us, we may also use the information as follows:

- to personalise the marketing information that we issue.
- to send information that we consider may be of interest to you.
- to produce market insights.
- to segment and distribute targeted marketing materials.
- to ask for opinions about our products or services.

Please notify us immediately of any changes in relation to your personal data so that we can ensure the accuracy of your personal data (eg change of address or telephone number).

### Does Clan Wealth Management need all this personal data about me?

We only collect the data that we need to provide the service(s) that you have requested. We must collect sufficient personal data in order to identify you as an individual. The GDPR prevents us from

collecting data which we do not need for legitimate purposes. We aim not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access, disclosure, or loss.

### Lawful Basis for Processing Personal Data

The GDPR requires that we must have a lawful basis for processing all personal data that we hold. We process all customer personal data in a manner that complies with the GDPR and in line with reasonable expectations. Our legal basis for processing your personal data is that you have explicitly given your consent to us. This consent can be given at the time when you initially seek our services, or having read the Customer Privacy Statement, that you consent to us processing the personal data you have supplied us. It is considered by Clan Wealth Management, to be reasonable to use customer personal data for the legitimate interests of our business relationship or potential relationship with our customers. Where necessary, in limited circumstances and in accordance with the law we may use customer personal data in the defence of legal claims.

### Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Clan Wealth Management to process personal data. Where we are asking you for sensitive personal data, we will always request your consent before processing. You may withdraw consent at any time by contacting our GDPR Officer.

### Who will Clan Wealth Management share my personal data with?

We may also share your details with third parties in order to fulfil our contractual, legal and regulatory obligations. These third parties may include, but not be limited to, Accountants, Solicitors and Subcontractors or Professional Services providers and IT Services providers.

All Third Parties engaged by Clan Wealth Management must comply with the General Data Protection Regulations. When they no longer need your data to fulfil this service, the third parties will dispose of your personal data in line with Clan

Wealth Management Ireland's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

Your personal data will not be shared for marketing purposes without your consent. In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. Clan Wealth Management has safeguards in place to ensure the security of your data in the event that such a transfer takes place.

### How long will Clan Wealth Management keep my personal data?

Clan Wealth Management will only retain personal data for as long as it is needed for the purpose for which it was collected. Once the retention period for a record has passed, that record is deleted from our systems. In some instances, Clan Wealth Management is required to retain information in accordance with the law, such as information needed for Revenue and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

### What are my rights in relation to my personal data once I give it to Clan Wealth Management?

At any point whilst we are storing or processing your personal data, you as the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

- Right of portability – you have the right to have the data we hold about you transferred to another organisation. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Clan Wealth Management refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the complaints section below. All requests will also be forwarded to any third party who is in the processing or storage of your personal data.

### How can I find out the personal data Clan Wealth Management holds about me?

Clan Wealth Management at your request, can confirm what information we hold about you and how it is processed. If Clan Wealth Management does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Clan Wealth Management or a third party, information about those interests.
- The categories of personal data collected, stored, and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they

meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information:

- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### What forms of ID will I need to provide to prove that I am the data subject?

Clan Wealth Management accepts the following forms of ID when information on your personal data is requested: Passport, Driving licence, National ID, Utility bill (not older than 6 months), Bank statement (not older than 6 months), Revenue / Social Welfare documentation (not older than 6 months).

### How do I make a complaint?

If you wish to make a complaint about how your personal data is being processed by Clan Wealth Management, by third parties engaged by Clan Wealth Management, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Clan Wealth Management's GDPR Officer.



### Clan Wealth Management GDPR officer

If you have any queries or concerns about your personal data, our GDPR Officer can be contacted in the following ways:

GDPR Officer

Clan Wealth Management

51 Ashfort, Golf Links Road, Castletroy, Limerick

Email: [info@clanwealth.ie](mailto:info@clanwealth.ie) Tel: 087-9918154

### Supervisory Authority

Data Protection Commissioner of Ireland

Office of the Data Protection Commissioner.

Canal House, Station Road, Portarlinton,

Co. Laois, R32 AP2, Ireland.

+353 (0761) 104 800 or 1890 25 22 31

[info@dataprotection.ie](mailto:info@dataprotection.ie)