

Heritage Wealth Management Limited T/A Heritage Wealth is committed to respecting and protecting your privacy and would like you to feel safe when you give us your personal details. We will always clearly identify ourselves in correspondence and on our website. Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life, pensions, savings and investment products. In order to provide you with relevant information and to respond to your requests, we sometimes request that you provide us with information about yourself. This privacy notice will inform you of the information we gather and how it is used.

Heritage Wealth maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both of those methods of data collection and use. Heritage Wealth complies with EU General Data Protection Directive (GDPR) for the collection, use and retention of all personal data. A printed (hard copy) version of this data privacy policy is available on request.

Heritage Wealth Management Limited T/A Heritage Wealth is regulated by the Central Bank of Ireland for the following activities:

- As an investment business firm authorised under the Investment Intermediaries Act, 1995 to provide the services of an investment intermediary,
- As an insurance intermediary registered under the European Union (Insurance Distribution) Regulations, 2018,
- As a mortgage credit intermediary/mortgage intermediary authorised pursuant to Section 31(10) of the European Union (Consumer Mortgage Credit Agreements) Regulations 2016 and Section 151A (1) of the Consumer Credit Act 1995.
- For the purposes of GDPR Heritage Wealth is the data controller and our contact details are: GDPR Owner:

Karen O'Brien,
Address: 14 South Bank, Crosses Green, Cork City, T12 YKW4
Telephone: 021 239 0880
Email: karen@heritagewealth.ie

WHAT INFORMATION WE GATHER

The personal information we collect varies depending upon the nature of the service you have asked us to provide. We collect data about you when you:

- Request a service from us;
- Use our website (see below);
- Engage with us on social media such as via a LinkedIn or Facebook page;
- Contact us with a complaint or query;
- Apply for a position with us.

Data is retained and processed to provide you with one of our services, and to comply with relevant laws and regulations, including internal operating procedures and compliance checks.

We may collect data under a number of categories, including:

- **Identification & Contact Information**, including your Name, Date of Birth, Gender, Marital Status, PPS Number, Address, Email Address, Home Phone Number, Work Phone Number, Mobile Number
- **Financial Details & Financial Information**, including your Occupation, Job Title, Total Remuneration, Employment Details, Existing Pension Benefits, Employer Name, Bank Details, Tax Residence, your Income, Assets and Liabilities.
- **Health information** such as information about your health status, medical records and medical assessment outcomes.
- **Pensions Benefits** information such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions

When we collect sensitive personal data as defined within the GDPR, such as health information, we will ensure that we require this information, and that we have your explicit consent and/or authorisation prior to our collection.

In general, you may visit our website without identifying yourself or revealing any personal information. Heritage Wealth collects domain information from your visit to customise and improve your experience on our website.

This website may collect certain information from your visit, including the date and time of your access, the pages you have accessed, the name of the Internet Service Provider and the Internet Protocol (IP) address by which you are accessing the Internet, and the Internet address from which you linked to our site, if applicable. We use this information to better understand how our website is being used so that we can improve its performance.

Some portions of our website may request that you give us information about yourself, from which we are able to identify you; such as your name, email address or other address. Some of the ways in which we may collect information from you via our website are:

- Subscription to newsletters or other Heritage Wealth content-related correspondence
e.g. Event registrations for seminars, conferences etc.
- White paper or other downloads

OUR LAWFUL BASIS

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data:

- To provide the service(s) we have contracted to provide to you;
- To comply with a legal or regulatory obligation such as e.g. the requirement to carry out anti-money laundering customer due diligence;
- Where we collect sensitive personal data such as health information we can only do so on receipt of your explicit consent. We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time.
- The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to send you information or contact you in relation to a Heritage Wealth product or service that you are using or that we believe may be of interest to you after you have chosen to 'Opt In'.

You will have the option of not providing information, in which case you may not be able to provide you with our regulated services, but you may still be able to access other parts of this website. In certain areas of our website, we may, where appropriate, enable you to 'opt in' to certain uses of your information e.g. personal data and direct marketing.

SHARING INFORMATION WITH THIRD PARTIES

In certain instances, we may make your information available to third parties with whom we have a relationship where that third party is providing services on our behalf. We will only provide those third parties with information that is necessary for them to perform the services and we take measures to protect your information.

We may also share your data with regulatory and other governmental bodies where required by or under any enactment or rule of law or court order, including, but not limited to, the Central Bank of Ireland, Revenue Commissioners, An Garda Síochána or the Financial Services & Pensions Ombudsman.

If we transfer personal data to a third party or outside the EEA we as the data controller will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available. We do not currently transfer personal data outside of the EEA.

YOUR RIGHTS AS A DATA SUBJECT

At any point while we are in possession of or processing your personal data, you, 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.
- 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 Heritage Wealth refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data.

DATA SECURITY

Heritage Wealth's intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect, including the use of encryption when collecting or transferring sensitive data such as credit card information.

However, you should always take into consideration that the internet is an open forum and that data may flow across networks with little or no security measures, and therefore such information may be accessed by people other than those you intended to access it.

RETENTION OF PERSONAL INFORMATION

We retain personal information for only as long as we are required to provide the service(s) you have asked us to provide and/or to comply with regulatory or legal obligations. Our default retention period for this information, in line with regulations and statutory requirements, is currently 6 years following the cessation of a client relationship.

Personal data will be disposed of securely.

IF YOU HAVE A COMPLAINT

If you wish to make a complaint about how your personal data is being processed by Heritage Wealth or how your complaint has been handled, you have the right to lodge a complaint with our GDPR Owner whose contact details are provide above.

You also have the right to complain to the Office of the Data Protection Commissioner at:

Data Protection Commission
21 Fitzwilliam Square South, Dublin 2, D02RD28
Web: www.dataprotection.ie
Email: info@dataprotection.ie

CONTACTING US

If you have any questions or comments about our privacy notice or practices, please contact us. Heritage Wealth may modify or update this privacy notice from time to time at any time without prior notice. You can check the 'Last Updated' date below to see when the notice was last changed. We encourage you to check this notice often so that you can continue to be aware of how we are protecting your personal information.

Contact Email: karen@heritagewealth.ie
Privacy notice last updated on: 27th February 2023



email: gerard@heritagewealth.ie
web: www.heritagewealth.ie

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083 466 2040

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021 239 088

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