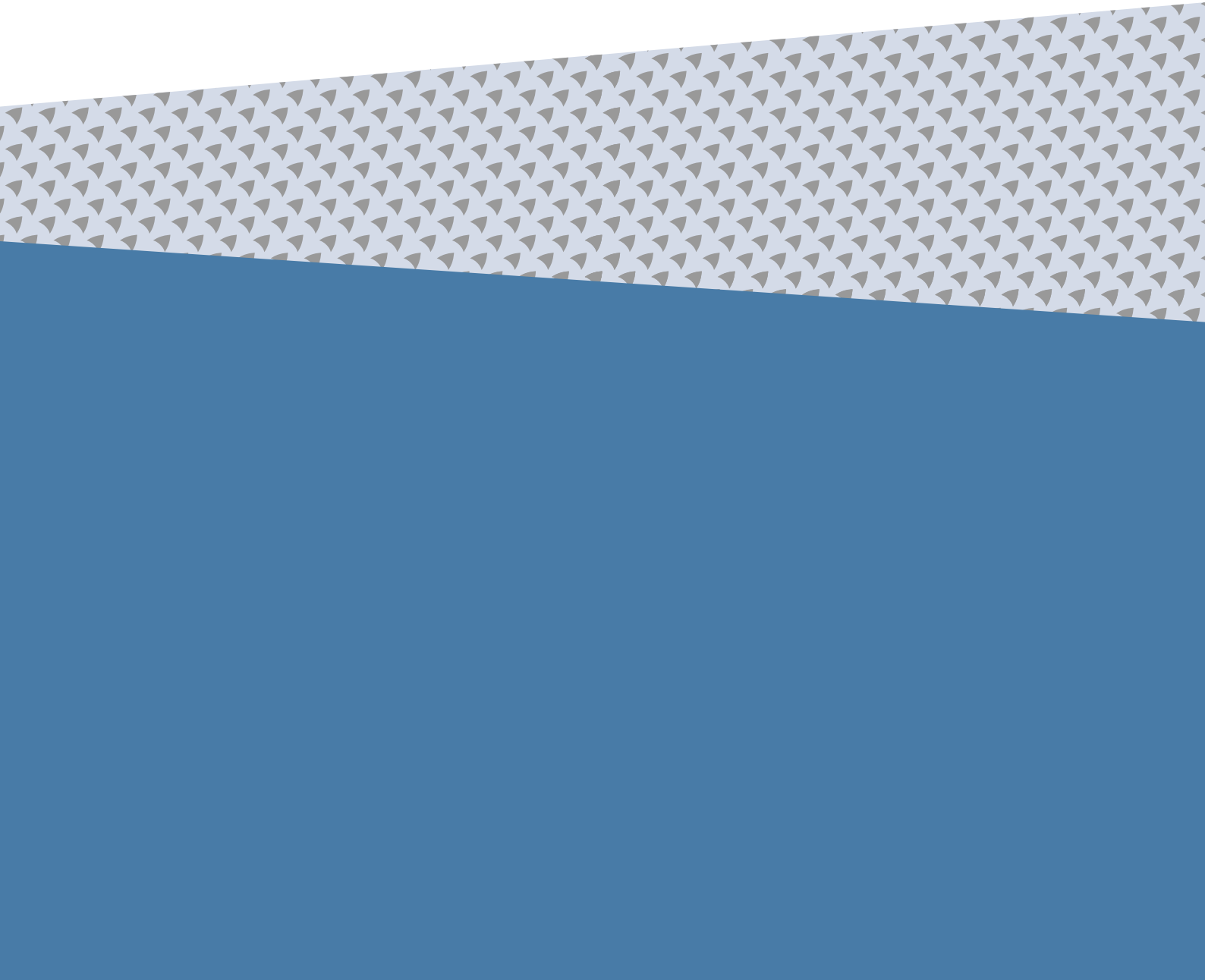


# DATA PRIVACY SUMMARY



## DATA PRIVACY SUMMARY

At BCP Asset Management DAC, we take your privacy seriously. It is important that you know exactly what we do with personal information that you and others provide to us, why we gather it and what it means to you. This document is being provided to you in line with our obligations under the General Data Protection Regulation (GDPR), which came into force on 25 May 2018. From that date, the GDPR, together with applicable Irish requirements, amends existing data protection law and place enhanced accountability and transparency obligations on organisations when using your information. The GDPR introduces changes which gives you greater control over your personal information.

Please take time to read this summary notice carefully. It explains the most important aspects of how we use your personal information and what rights you have in relation to it. The full information is detailed in our Data Privacy Notice at [www.bcp.ie/privacy-policy](http://www.bcp.ie/privacy-policy). If you have any questions about how we use your information, please contact our Data Protection Team by calling us on 01 668 4688 or by writing to BCP Asset Management DAC, 71 Upper Leeson Street, Dublin 4.

### PART 1 WHO WE ARE

- 1.1 BCP Asset Management DAC is a private company limited by shares. BCP Asset Management DAC is a data controller in respect of personal information that we process in connection with our business (including the products and services that we provide). In this notice, references to “we”, “us” or “our” are references to BCP Asset Management DAC, its subsidiaries BCP Fund Management DAC and Relko Nominees DAC; and its holding company BCP Private Clients DAC.
- 1.2 Our principal address is BCP Asset Management DAC, 71 Upper Leeson Street, Dublin 4 and our contact details can be located at [www.bcp.ie](http://www.bcp.ie)

### PART 2 THE INFORMATION WE COLLECT ABOUT YOU

- 2.1 We collect and process various categories of personal information at the start of and for the duration of your relationship with us. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice. Personal information may include:
  - 2.1.1 basic personal information, including name and address, date of birth and contact details, professional qualifications and where relevant professional experience;
  - 2.1.2 your Personal Public Service Number (PPSN) where required by law or Tax Reference Number (TRN);
  - 2.1.3 financial information, including account and transactional information and history;
  - 2.1.4 information about your family, lifestyle and social circumstances (such as dependants, marital status, next of kin and contact details);
  - 2.1.5 information about your financial circumstances, including personal wealth, assets and liabilities, investment experience, proof of income and expenditure, credit and borrowing history and needs and goals;
  - 2.1.6 education and employment information;
  - 2.1.7 goods and services provided; and
  - 2.1.8 visual images and personal appearance (such as copies of passports/driving licences)
- 2.2 Sometimes we may use your information even though you are not our customer. For example, you may be a beneficiary, director or trustee of a customer of ours or be a potential customer applying for one of our products or services.

### PART 3 WHEN WE COLLECT YOUR INFORMATION

- 3.1 We collect information: (i) you gives us; (ii) information from your use of our products, services or our websites and mobile apps, and; (iii) information provided to us by third parties.

### PART 4 HOW WE USE YOUR INFORMATION AND THE LEGAL BASIS

- 4.1 We use, and share, your data where:
  - 4.1.1 Where we have been advised you have consented to the using of your data in a specific way (you may withdraw your consent at any time);

- 4.1.2 use is necessary in relation to a product or service we have provided to you.
- 4.1.3 use is necessary because we have to comply with a legal obligation (e.g. complying with our “know your client” obligations and reporting to regulatory authorities and law enforcement);
- 4.1.4 use is necessary to protect your “vital interests” in exceptional circumstances;
- 4.1.5 use for our legitimate interests (which you may object to) such as managing our business, providing service information, conducting marketing activities, training and quality assurance, portfolio management and strategic planning.

## PART 5 WHO WE SHARE YOUR INFORMATION WITH

- 5.1 We only share your information with a select number of individuals and companies, and only as necessary. Sharing can occur in the following circumstances and/or with the following persons:
- 5.2 Your authorised representatives:
  - 5.2.1 Third parties we need to share your information with in order to facilitate investments you have made (for example third party custodians) and those you ask us to share your information with.
  - 5.2.2 Companies in the BCP Group.
  - 5.2.3 When you open or use a joint account or product.
  - 5.2.4 Companies that provide support services for the purposes of protecting our legitimate interests.
  - 5.2.5 We may also share information with the following third parties to help us manage our business for our legitimate interests. Statutory and regulatory bodies (including central and local government) and law enforcement authorities.
  - 5.2.6 All personal data is stored within the European Economic Area. We will not transfer any data to any third country or international organisation without your explicit consent and without appropriate privacy safeguards in place.
  - 5.2.7 Your financial adviser/broker or agent.

## PART 6 HOW LONG WE HOLD YOUR DATA

- 6.1 How long we hold your data for is subject to legislation and regulatory rules we must follow, set by authorities such as the Central Bank of Ireland and the type of financial product provided to you.

## PART 7 IMPLICATIONS OF NOT PROVIDING YOUR DATA

- 7.1 If you do not provide information we may not be able to:
  - 7.1.1 provide requested products or services to you;
  - 7.1.2 to continue to provide and/or renew existing products or services
  - 7.1.3 assess appropriateness or suitability; and
  - 7.1.4 where relevant, gives you a recommendation for a financial product or service provided by us.
- 7.2 We will tell you when we ask for information which is not a contractual requirement or is not needed to comply with our legal obligations.

## PART 8 HOW TO EXERCISE YOUR INFORMATION RIGHTS INCLUDING THE RIGHT TO OBJECT

- 8.1 From 25 May 2018, you have several enhanced rights in relation to how we use your information, including the right, without undue delay, to:
  - 8.1.1 find out if we use your information, access your information and receive copies of your information;
  - 8.1.2 have inaccurate/incomplete information corrected and updated;
  - 8.1.3 object to particular use of your personal data for our legitimate business interests or direct marketing purposes;
  - 8.1.4 in certain circumstances, to have your information deleted or our use of your data restricted;
  - 8.1.5 in certain circumstances, a right not to be subject to solely automated decisions and where we make such automated decisions, a right to have a person review the decision;

- 8.1.6 exercise the right to data portability (i.e. obtain a transferable copy of your information we hold to transfer to another provider); and
- 8.1.7 to withdraw consent at any time where processing is based on consent.
- 8.2 If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests) we may extend this period by a further two calendar months and shall explain the reason why. If you make your request electronically, we will try to provide you with the relevant information electronically.
- 8.3 You also have the right to complain to the Data Protection Commission or another supervisory authority. You can contact the Office of the Data Protection Commissioner at:

**Website:** <https://forms.dataprotection.ie/contact>

**Telephone:** +353 (0)7650100 or 1800437 737

**Postal Address:** 21 Fitzwilliam Square South, Dublin 2, D02 RD28.

## PART 9 / HOW TO CONTACT US AND/OR OUR DATA PROTECTION TEAM

- 9.1 If you have questions about how we use your information, you can reach our Data Protection Team at:

**Telephone:** 01 668 4688

**E-mail:** [dataprotection@bcp.ie](mailto:dataprotection@bcp.ie)

**Postal:** BCP Asset Management DAC, 71 Upper Leeson Street, Dublin 4.

