

JLT PRIVATE WEALTH

FAIR PROCESSING NOTICE



We know how important privacy is to you. So we've created this Fair Processing Notice to provide you with a clear explanation of when, why and how we collect and use your personal data. We've designed it to be as user friendly as possible, and have labelled sections to make it easy for you to navigate to the information that may be most relevant to you.

Please read this Notice with care, it applies to any personal data we have collected or will collect from you for the purposes set out below in Section 2. In this Data Protection Notice, a reference to “you” means the person whose personal information we collect, use and process. It provides important information about how we use your personal data and explains your legal rights. This Notice does not override the terms of business you have with us or any rights you have available under data protection law. We may amend this Notice from time to time; for example, to keep it up to date or to comply with legal requirements or changes in the way we operate our business. We will publish the up to date version of this Notice on our web site and you can find it using the following link <http://www.jlt.com/data-protection/ire/JLT-Employee-Benefits-Ireland>.

1. Who is responsible for looking after your personal data?

We, JLT Private Wealth, are responsible for the information that we collect and process about you. You should be aware that your information may be held in databases which can be accessed by other JLT Group companies.

2. What do we use your personal data for?

We use your personal data to:

- understand your circumstances in order to determine the financial services you require;
- provide on-going services to you subject to the terms of business, typically in relation to a financial services arrangement;
- provide you with on-going support (such as managing changes in address, issuing and processing of forms, updating systems, carrying out your instructions, engaging with providers, preparing and issuing invoices);
- determine our recommendations and provide you with financial advice;
- enable JLT to comply with legal or regulatory obligations, such as, but not limited to, tax or regulatory reporting, including disclosure to tax or regulatory agencies;
- record all incoming and outgoing calls for training, monitoring and security purpose, as well as to keep an accurate record of any instructions received from you in relation to your investments;

Definitions

Notice – This Fair Processing Notice. Also referred to as a Privacy Notice.

We, us – JLT Private Wealth, part of the Jardine Lloyd Thompson Group plc. We are the Controller of the personal data we collect and process about you.

JLT Group – Jardine Lloyd Thompson Group plc and in the event that Jardine Lloyd Thompson Group plc is acquired by a purchasing firm, JLT Group shall include all companies within the purchasing firm

Your Personal Data - The personal data that we collect and process about you.

Special Category Data - Categories of information that require enhanced protection measures. This includes, for example, health related information.

Processing – Any set of actions which is performed on Personal Data such as collecting, recording, organising, structuring, storing, altering, retrieving, using, disclosing or destroying.

Controller – The person or body that determines the purposes and means of processing. We are a controller for the purpose of providing you with services under our terms of business with you.

Processor – The person or body that processes Personal Data on our behalf.

Profiling - Using automated processes without human intervention (such as computer programmes) to analyse your personal data in order to evaluate your behaviour or to predict things about you, such as your likely risk profile.

CBI – The Central Bank of Ireland, a financial regulatory body. **DPC** - The Data Protection Commissioner who regulates the processing of personal data by all organisations in Ireland. See www.dataprotection.ie for more information.

Service Providers - Third parties to whom we outsource certain functions of our business. We require all our service providers to respect the confidentiality and security of personal data.

- carry out monitoring and to keep records, including administering and managing your investments and services relating to that, updating your records, and tracing your whereabouts to contact you about your investment;
- provide you with information about other services that we or other parts of the JLT Group can offer;
- support our controls and management information;
- improve our processes and use of technology; and
- meet our legal and regulatory obligations.

We may make decisions using automated means, including profiling, in order to understand your risk profile. The outcome will be shared with you and you will have the opportunity to change your risk profile. Your risk profile helps us determine our recommendations.

We have set out the legal basis we use for collecting and using your personal data which can be found at <http://www.jlt.com/data-protection/ire/JLT-Employee-Benefits-Ireland>

3. What personal data do we collect?

We will only collect your personal data where it is relevant for the purposes set out in Section 2. The information we collect may include:

| Categories of personal data | Examples of personal data we may collect |
|-----------------------------------|---|
| Personal attributes | Name; Age or date of birth, Public Service Number; Marital information (including divorce). |
| Personal directory | Address (including postcode); Email address; Telephone numbers; Employment history; Passport; Utility bills; Birth certificate; Death certificate, or other forms of identity provided by you, , sometimes we may collect additional information about you from third parties. Specifically, we will obtain information about you from; government departments such as the Revenue Commissioners and the Department of Social Protection and publicly accessible sources (e.g. the electoral register ¹) if we have lost touch with you and we are trying to find you |
| Financial data | Salary / wage; Bank account information; Other financial information e.g. fund values, insured amounts. tax residency |
| Special categories of data | Medical diagnosis; Health information. |
| Background checks | Outside Directorships & external business interests; Drinking habits; .. |

Certain additional information may be collected where this is necessary for the performance of our services to you and permitted by regulation.

From time to time, you may need to provide us with someone else's personal data, e.g. your dependants, nominated beneficiaries, power of attorney, nominated representatives etc. Wherever possible, you should take steps to inform them that you need to disclose their details to us, obtain their consent to do so and identify us as the party with whom you are sharing their information. Please provide them with a copy of this Notice.

We will obtain your explicit consent before collecting and/or using any Special Category Data or providing you with information about other services that we offer, where your consent is required under data protection law. If you provide your explicit consent, you may withdraw that consent at any time. However, you should be aware that if you choose to withdraw your consent to collect or use Special Category data then we may be unable to continue to provide services to you or offer you the most appropriate advice. If you choose to withdraw your consent we will tell you about the possible consequences at that time.

4. Who do we collect your personal data from?

We will collect information from you over the course of our dealings with you. We may also obtain information about you from financial institutions, your employer and occupational pension scheme trustees with whom you have assets / benefits and from other sources where we believe this is necessary to assist in validating your identity and/or in fighting financial crime. These sources may include public registers, social media and other online sources, credit reference agencies and other reputable organisations.

5. Who do we share your personal data with?

We may make data available to processors and third party service providers of JLT Financial Planning Ltd under conditions of strict confidentiality. Your personal data may also be disclosed where we have a legal obligation or duty to disclose it, for example to comply with anti-money laundering and counter-terrorism requirements. We work with other members of the JLT Group and Service Providers to help manage our business and deliver services to you. These parties may from time to time need to have access to your personal data. The Service Providers may include:

- Financial institutions with whom you have assets;
- Providers of pension transfer analysis calculations, suitability reports and portfolio valuations;
- other, e.g. external printing services
- Businesses who help manage our IT and back office systems;
- Internal JLT Group functions who help manage our IT / Compliance and back office systems;
- Organisations working to prevent fraud in financial services; and
- Auditors and other professional services firms.

We may be under legal or regulatory obligations to share your personal data with public authorities, government bodies, courts, regulators (which may include the Central Bank of Ireland and DPC) and law enforcement agencies in the E.U. and around the world. Also, if we were to sell part of our businesses we would need to transfer your personal data to the purchaser of such businesses.

We will not share your personal data with third parties for marketing purposes.

6. International Transfers

From time to time we may need to share your personal data with members of the JLT Group or Services Providers who may be based outside the European Economic Area (EEA). We always take steps to ensure that any international transfer of information is managed carefully and in accordance with data protection law to protect your rights and interests. These measures include:

- Transfers of your personal data to countries which are recognised as providing an adequate level of legal protection;
- Transfers within the JLT Group where we have entered into Standard Contractual Clauses or an intra-group agreement, both of which give specific contractual protections designed to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred within the JLT Group; and
- Transfers to Service Providers protected by prior due diligence and contractual commitments such as signing the Standard Contractual Clauses and, where available, further assurances such as certification schemes.

You have the right to ask us for more information about our safeguards. Please contact us if you would like further information or to request a copy where the safeguard is documented (which may be redacted to ensure confidentiality).

7. How do we keep your personal data secure?

We take data security seriously. To reflect this, we've put in place a clear chain of responsibility when it comes to security. Our JLT Group Chief Information Security Officer (CISO) and CISO office is responsible for helping all JLT entities protect personal data and manage security risks. The CISO office does this by developing, monitoring and reviewing our information security framework policies and standards. Please contact us if you would like a copy of our Privacy and Security Statement.

8. How long do we keep your personal data?

We keep your Data for as long as it is necessary to do so to fulfil the purposes for which it was collected as described above and in accordance with our legal and regulatory obligations. The criteria we use to determine data retention periods for Data includes the following:

- i. retention in case of queries; we will retain it for a reasonable period after the relationship between us has ceased;
- ii. retention in case of claims; and
- iii. retention in accordance with legal and regulatory requirements

9. What are your rights?

You have a number of rights in relation to your personal data. You may request access to your data, correction of any mistakes in our files, erasure of records where no longer required, restriction on the processing of your data. You also have rights in respect of the processing of your data, data portability and information used in relation to any Automated Decision Making and Profiling, or the basis for international transfers. You can find out more information about your rights by clicking on this link. www.jlt.ie/employeebenefits/yourdata.html

Where we rely on our legitimate interests to obtain and use your personal data then you have the right to object if you believe your fundamental rights and freedoms outweigh our legitimate interests.

Where processing is carried out based upon your consent, you have the right to withdraw that consent. You may also exercise a right to complain to your Supervisory Authority. Please contact us if you wish to exercise any of your rights.

10. Contact, further information, queries and complaints

Our Data Protection Officer is your primary point of contact for all matters arising from this Notice, including requests to exercise your rights set out in section 9.

If you have any query, complaint or concern about how we use your personal data, please contact us in the first instance and we will attempt to resolve the matter as soon as possible. You also have a right to lodge a complaint with the DPC at any time.

You can contact our Data Protection Officer at **EB_DataProtectionOfficer@JLTGroup.com**.

APPENDIX 1: WHAT IS THE LEGAL BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA?

| Activity | The legal basis for the processing of your personal data * |
|---|--|
| To understand your circumstances in order to determine our recommendations and provide you with the services that you require | Performance of a contract |
| To provide on-going services covered by the terms of business, typically in relation to a pension or investment arrangement | Performance of a contract |
| To carry out on-going support (such as managing changes in address, issuing and processing of forms, updating systems, carrying out client instructions, engaging with providers, preparing and issuing invoices) | Performance of a contract |
| To provide you with information about other services that we or other parts of the JLT Group can offer | Consent |
| To support our controls and management information | Legitimate interest |
| To improve our processes and use of technology | Legitimate interest |
| To comply with legal and regulatory obligations. | Legal obligation |

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Cherrywood Business Park
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Dublin 18
Tel: +353 (1) 2026000

JLT Financial Planning Limited trading as JLT Corporate Benefits and JLT Private Wealth is regulated by the Central Bank of Ireland
Registered Office: Cherrywood Business Park, Loughlinstown, Dublin 18.
A member of Jardine Lloyd Thompson Group plc. Company Registration No. 47958. A Private Company Limited by Shares. VAT No IE 0059318N

Directors: Alan Broxson, Michael Lacey, Donal Coyne, Chris Carille, Paul Doherty, Pat Howett

JLT PRIVATE WEALTH

YOUR RIGHTS

| Your right | What this means |
|----------------------|---|
| Access | <p>You can ask us to:</p> <ul style="list-style-type: none">confirm whether we are processing your personal data;give you a copy of that data;provide you with other information about your personal data to the extent that information has not been provided to you in this Notice, such as what data we hold about you, what we use it for, who we disclose it to, whether we transfer it abroad and how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any Automated Decision Making or Profiling. |
| Rectification | <p>You can ask us to rectify inaccurate personal data. We may seek to verify the data before rectifying it.</p> |
| Erasure | <p>You can ask us to erase your personal data, but only where:</p> <ul style="list-style-type: none">it is no longer needed for the purposes for which it was collected; oryou have withdrawn your consent (where the data processing was based on consent); orfollowing a successful right to object (see 'Objection' below); orit has been processed unlawfully; orto comply with a legal obligation to which we are subject. <p>We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims. There are certain other circumstances in which we are not required to comply with your erasure request, although these two are the most likely circumstances where we would deny that request.</p> |
| Restriction | <p>You can ask us to restrict (i.e. keep but not use) your personal data, but only where:</p> <ul style="list-style-type: none">you contest the accuracy of your personal data (see Rectification), to allow us to verify its accuracy; orthe processing is unlawful, but you do not want it erased; orit is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; oryou have exercised the right to object, and verification of overriding grounds is pending. <p>We can continue to use your personal data following a request for restriction, where:</p> <ul style="list-style-type: none">we have your consent (for example to process a claim); orto establish, exercise or defend legal claims; orto meet legislative or regulatory requirements orto protect the rights of another natural or legal person. |
| Portability | <p>You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Controller, but in each case only where the processing is based on your consent or the performance of a contract with you; and the processing is carried out by automated means.</p> |
| Objection | <p>You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.</p> |

International Transfers You can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Economic Area. We may redact data transfer agreements or related documents (i.e. obscure certain information contained within these documents) for reasons of commercial sensitivity.

Supervisory Authority You have a right to lodge a complaint with your local supervisory authority about our processing of your personal data. In the UK, the supervisory authority for data protection is the ICO. We do ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

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