

Atlantic Wealth Management Ltd
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PRIVACY NOTICE

1. WHAT IS A PRIVACY NOTICE & WHY IS IT IMPORTANT?

Your personal information is important to you and as your financial adviser it is important to me too. This Privacy Notice tells you what your personal information is used for and explains your rights around how it is used. Please read this Privacy Notice to understand how and why your personal information is used.

If you give me personal information about someone else, please make sure you have their permission and make them aware of this Privacy Notice, as it also applies to them.

2. WHAT PERSONAL INFORMATION IS COLLECTED AND WHY

I use personal information to give you financial planning and advice services. I will assess your financial needs and recommend financial solutions to help meet your identified needs. This includes contacting you to arrange future financial reviews where I believe this is of benefit to you. I will need to collect personal information to provide this service including your name, date of birth and contact details. Depending on the type of advice you are looking for I will need financial information such as income, expenses, assets, occupation, health and information about your dependents.

If I am the appointed financial adviser on any of your plans I will act as your intermediary for those plans. The lawful basis to collect and use personal information is explained below.

3. LAWFUL BASIS OF PROCESSING

I must have a lawful basis to collect and use personal information. This is explained below:

Required by law:

Your personal information is used to comply with law and regulations:

- reporting to regulators; and
- keeping proper books and records.

Internal reporting, quality checking and compliance controls are carried out to help meet these obligations.

Certain personal information must be collected to comply with Anti-Money Laundering law. This depends on your plan type but includes up to date proof of identification and address information.

I must collect certain personal information to give you financial advice. You must give me personal and financial information about you and your dependents for me to assess your current and future needs. This will include information about your general state of health. I need this to make an appropriate financial recommendation for you. This will involve creating new and inferred personal information about you such as your investment risk profile. This analysis must be carried out using your personal information to comply with regulations.

As a regulated intermediary I must use your personal information to identify whether a financial product is suitable for you based on the product target market identified by the relevant product provider.

When you give me your personal information I will check to see if I already have a record of you. This helps me to comply with your Data Protection rights. Please see section 9 of this Privacy Notice.

The type of personal information that is required by law may vary in the future and depends on the type of service I provide.

Legitimate interest:

Your personal information is used for certain legitimate interests as shown below. This doesn't affect your privacy rights. I have taken account of any privacy risks and ensured that your data protection rights are not affected. Customers should benefit from these uses. You can contact me if you have any questions using the details in section 10 of this Privacy Notice.

- **Sharing with Product Providers:**
 - Some of your relevant personal information will be shared with product providers in order to obtain quotations and service your plans.
- **Statistical Analysis:**
 - Personal information will be combined and grouped for analysis in order to help understand my customers and develop better services.
- **Customer queries and service requests:**
 - When you send a query or request a service, the personal details needed to respond to your request will be collected.
- **Call Recording:**
 - Calls may be recorded for staff training and monitoring. In certain instances, the number you're calling from will be saved to help deal with your call and direct you to the most suitable team. This includes calls through landline, internet or mobile. You will be informed if a call is being recorded at the start of the call so you can decide to continue or not.

With your consent:

You need to give your consent in order for me to collect and use personal information classed as 'sensitive personal information' or for certain uses of your personal information. You are given the choice to provide consent, or not. When your consent is collected, I will explain what it is needed for and how you can change your mind in the future.

- **Biometric Data:** - Where you have consented information will be collected to identify you through voice, facial or fingerprint recognition technology.
- **Cookies** – When you visit my website, I will use cookies for purposes such as:
 - to make my website work properly.
 - to understand how visitors use my site and to help me improve it.
 - to remember your preferences and settings.
 - to deliver relevant advertisements and content based on your interests.

You can choose to accept or decline these cookies using your browser or device settings. Blocking some types of cookies may affect your experience of the site.

For more detailed information on the cookies we use and how you can manage them, please refer to my Cookies policy.

4. CONSENT AND HOW TO WITHDRAW CONSENT?

If your personal information is processed based on consent, you have the right to withdraw that consent at any time. The opt-out methods will depend on how the consent was collected and will be explained when you give your consent.

You will also be able to withdraw consent by contacting me directly using the details in section 10 of this Privacy Notice.

If you have received advice from me and then choose to withdraw consent to the further use of personal information, I will not contact you in relation to future financial reviews. However, I am still required by law to hold details of past financial reviews for specific purposes and periods.

5. HOW AND WHERE IS YOUR PERSONAL INFORMATION OBTAINED?

Personal information is provided directly when you contact me (either verbally, in writing or electronically) or complete a financial review.

If I act as your appointed financial adviser, I will also get your plan and personal information from your product provider, generally Irish Life Assurance.

6. WHO IS YOUR PERSONAL INFORMATION PASSED TO?

Personal information is passed to:

- **Data Processors:**
 - Companies that act as service providers under contract and only process your personal information as instructed by me. Your personal information is transferred securely and is not used by other parties for any other reason. My four main Data Processors are Irish Life Assurance plc, Irish Life Financial Services Ltd, Irish Life Group Services Ltd and Canada Life Group Services Ltd. The categories of services where other Data Processors are used include: document management, telephony and communications, administration and customer research.
- **Your Product Provider(s):**
 - If I act as your intermediary to service and advise on your plan(s).
- **Regulators:**
 - Regulatory bodies and agencies or as needed to comply with regulations and laws.

7. IS YOUR PERSONAL INFORMATION TRANSFERRED OUTSIDE OF THE EU?

Your personal information is processed and stored within the EU. However data may be transferred or accessed from outside the EU in certain circumstances.

Passing your information to certain countries, including the UK and Canada, is allowed under an Adequacy Decision made by the European Commission. Where I or one of the data processors outlined above, transfer your personal information outside the EU, steps will be taken to ensure that your personal information is adequately protected and transferred in line with data protection law.

8. HOW LONG IS IT KEPT?

Your personal information is kept for as long as you are a customer of mine. It is also held after this where needed for complaints handling, for system back-ups and for as long as required under regulations.

Where you have availed of a regulated product or service, I will retain your personal information for 7 years after your relationship has ended.

I will let you know how long personal information is kept for when you avail of a single or specific service.

9. WHAT ARE YOUR RIGHTS?

You have a number of rights over your personal information which you can exercise free of charge by contacting me using the details in section 10 of this Privacy Notice. You will need to give me information to identify you and I will respond to you within one month in line with regulation. Any restrictions to your rights will be explained in my response.

Right to Information

You have a right to the information set out in this Privacy Notice. The most recent version of my Privacy Notice will always be accessible by contacting me at the address shown in section 10. If any changes are made to the type of personal information collected and / or how it is used, you will be informed of the changes.

Controls are in place to protect your personal information and minimize the risk of security breaches. However should any breaches result in a high risk for you, you will be informed without undue delay.

Right to Restrict or Object

You can restrict or object to any unfair and unlawful collection or use of your personal information.

Right to Correct and Update

You can ask me to correct and update personal information I hold about you. It is important that I have your up to date personal and financial information in order to give you the most appropriate advice, including ongoing advice that takes account of your changing needs.

Right to Delete and Be Forgotten

You can have your personal information deleted if it is incorrect, if it is no longer needed or has been processed unfairly or unlawfully.

If you have withdrawn consent you can ask for your personal information to be deleted. A record will be kept of your request so it is clear why your personal information was deleted.

If a regulated service has been provided for you, your personal information must be kept for a minimum period by law.

Right to Portability

You can ask for a copy of all personal information that you provided and which is held in an automated format. You can receive this in a machine readable format that allows you to keep it.

You may also request that this personal information is sent in a machine readable format to another company. The format will depend on my ability to provide this in a secure way that protects your personal information.

It is unlikely that I will be able to use a copy of your personal information sent in this way from another company. This is because I only collect personal information that is needed for the services I offer. Your most up to date personal information is also needed to give you the most appropriate advice and to comply with regulations.

Right to Access

You have the right to know what personal information is held about you and to receive a copy of your personal information.

I must tell you:

- > why it is held;
- > who it is passed to, including whether it is transferred outside the EU;
- > how long it is kept for;
- > where it was obtained.
- > If we carried out any automated decisions, and if so, the logic behind it and what it means for you.

This right does not allow you access personal information about anyone else.

To access your personal information please write to me using the contact details in section 10 of this Privacy Notice. To help me respond as quickly as possible please let me know if you are only looking for copies of specific personal information.

10. HOW TO CONTACT ME

You can contact me with any questions about your personal information and this Privacy Notice:

Address: Eyre Street, Galway, H91 P295
Mobile Number: 087 1222655
Email: niall.leyden@ifinpp.ie

A copy of the most up to date privacy notice will always be available on my website <https://www.atlanticwm.ie>.

11. COMPLAINTS

If you do not think that your personal information has been processed in line with this Privacy Notice, please contact me.

If you are not happy with how your personal information has been processed or your privacy rights handled, you can complain to the Data Protection Commission using the contact details below:

Address:	Data Protection Commission 21 Fitzwilliam Square South, Dublin 2,
Telephone:	D02 RD28 +353 0761 104800
LoCall:	1890 252 231
Fax:	+353 57 8684757
Email:	info@dataprotection.ie

Atlantic Wealth Management Ltd is regulated by the Central Bank of Ireland. Atlantic Wealth Management Ltd is tied to Irish Life Assurance plc for life and pensions business. Irish Life Assurance plc, trading as Irish Life is regulated by the Central Bank of Ireland.

This Privacy Notice is effective from March 2026.