

DATA PROTECTION NOTICE

Duggan Asset Management Limited trading as Duggan Asset Management and AltVest takes data privacy seriously. We are committed to protecting your personal data and respecting your privacy.

The protection of your personal data is important to us and we have adopted strong principles in that respect.

To the extent that the European General Data Protection Regulation applies and in accordance with applicable law, this Data Protection Notice provides you with detailed information relating to the protection of your personal data by Duggan Asset Management and AltVest.

We are sometimes responsible, as a controller, for collecting and processing your personal data in relation to our activities. The purpose of this Data Protection Notice is to let you know which personal data we collect about you, the reasons why we use and share such data, how long we keep it, what your rights are and how you can exercise them.

Further information may be provided where necessary when you apply for a specific product or service.

1. Which personal data do we use about you?

We collect and use your personal data to the extent necessary in the framework of our activities.

We may collect various types of personal data about you, including **Identification information** (e.g. name, ID card and passport numbers, nationality, place and date of birth, gender, photograph, IP address), **Contact information** (e.g. postal address and e-mail address, phone number), **Family situation** (e.g. marital status, number of children), **Tax status** (e.g. tax ID, tax status), **Education and employment information** (e.g. level of education, employment, employer's name, remuneration), **Banking, financial and transactional data** (e.g. bank account details, credit card number, money transfers, assets, declared investor profile, credit history, debts and expenses).

We never ask for personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data, data concerning your sexual orientation or data relating to criminal convictions and offences ("**Criminal Record Data**") unless it is required through a legal obligation.

2. Specific cases of personal data collection, including indirect

In certain circumstances, we may collect and use personal data of individuals with whom we have, could have, or previously had, a direct relationship such as visitors to our websites, prospective or existing clients and attendees at one of our events.

3. Why and on which basis do we use your personal data?

To comply with our Introducing Broker and Product Distribution obligations:

We use your personal data to comply with the requirements of Product Manufacturers and Product Providers for whom we act as Introducer including:

- setting up security measures in order to prevent abuse and fraud;
- detect transactions which deviate from normal patterns;
- monitor and report risks that institutions could incur;
- record, when necessary, phone calls, chats, email and meetings;
- reply to an official request from a duly authorised public or judicial authority;
- prevention of money-laundering and financing of terrorism;
- compliance with legislation relating to sanctions and embargoes and
- fight against tax fraud and fulfilment of tax control and notification obligations.

4. Who do we share your personal data with?

In order to fulfill the aforementioned purposes, but subject to applicable law relating to information sharing, we only disclose your personal data to:

- Service providers which perform services on our behalf;
- Independent agents, intermediaries or Brokers, banking and specialised partners, with which we have a regular relationship;
- Financial, taxation, regulatory or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law.

5. How long do we keep your personal data for?

We will retain your personal data for the longer of: (i) the period required by applicable law; or (ii) such other period necessary for us to meet our operational obligations, such as: proper account maintenance, facilitating client relationship management, and responding to legal claims or regulatory requests. Most personal data collected in relation to a specified client is kept for the duration of the contractual relationship with such client plus a specified number of years after the

end of the contractual relationship or as otherwise required by applicable law. If you would like further information on the period for which your personal data will be stored or the criteria used to determine that period please contact us.

6. What are your rights and how can you exercise them?

Depending on the data protection laws which apply to your situation, you have certain rights in respect of your personal data. In the event that the European General Data Protection Regulation applies, you have the following rights:

To access: you can obtain information relating to the processing of your personal data, and a copy of such personal data.

To rectify: where you consider that your personal data is inaccurate or incomplete, you can require that such personal data be modified accordingly.

To erase: you can require the deletion of your personal data, to the extent permitted by law.

To restrict: you can request the restriction of the processing of your personal data.

To object: you can object to the processing of your personal data, on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing.

To withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.

To data portability: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

If you require further information, or if you wish to exercise the rights listed above, please email us at the address set out below. Please include a scan/copy of your passport or drivers licence for identification purpose.

7. How can you keep up with changes to this Data Protection Notice?

In a world of technological change, we may need to update this Data Protection Notice from time to time. We invite you to review the latest version of this notice on our website.

8. How to contact us?

If you have any questions relating to our use of your personal data under this Data Protection Notice please contact us at niall.duggan@dam.ie.