

## Data Privacy Notice – Customer Summary

Bespoke Trustees Limited (BTL) takes your privacy and confidentiality seriously. You provide us with personal and financial information and we want you to understand why we collect your data, what we do with it, who we share it with, why we share data, and understand your legal obligations.

Any personal information which you volunteer will be treated with the highest standards of security and confidentiality and strictly in accordance with the Data Protection Acts 1998 to 2018, and the General Data Protection Regulations 2016/679. This Privacy Notice explains the most important aspects of the information we collect about you generally and through our website, how we use your information and what rights you have in relation to your personal information.

Please take time to read this notice carefully. If you have any questions about how we use your information or should you seek clarification on any points in this summary, please contact us as shown below.

### 1. Who we are

BTL is a provider of self-administered pension products and services to the Irish Intermediary Market. BTL is a Revenue appointed Pensioner Trustee and a Registered Administrator appointed by the Irish Pensions Authority. From time to time BTL also provides investment products suitable for pension and personal investors to the Irish Intermediary Market.

### 2. The information we collect about you

We will hold:

- data to identify you, including your contact information i.e. name, address, telephone number(s), email address, gender, date of birth, occupation, PPS number, photographic identification, nationality;
- your financial details/financial circumstances as necessary i.e., employment details, salary details, details of existing or retained pensions, tax residence, bank account details (where applicable);
- your marital or civil status;
- special categories of Personal Data e.g. medical information. Such data will only be processed where this is a requirement in order to provide our services to you or where it is required under a legal obligation to which BTL is subject;
- information about you provided by others e.g. your spouse/partner, professional advisors, etc.;
- information which you have consented to us using;
- other personal information i.e. information provided by you during the course of your relationship with BTL e.g. data to complete a transaction, investment on behalf of your pension structure;
- information provided when exercising your rights.

Sometimes we may use your information even though you are not our customer. For example, you may be a trustee or beneficiary under a trust, a director of a client company, an employee of a client, a member of your employer's pension scheme, a representative of a person applying for or using our products or services, or be a potential customer applying for one of our products or services.

### **3. When we collect your information**

We collate information at the initial point of contact with you when you apply for our products or services. We update this information during the course of our relationation and whenever you require a further service or product.

### **4. How and why we use your information**

#### **To fulfil our contractual obligations**

Data is processed in order for BTL to provide products and services to you in accordance with the pension and/or investment contract between us. The purpose of the data processing will be geared in the first instance to the product itself (e.g. pensions and investments) including but not limited to pension administration, record keeping functions, reporting, payroll services, consultation and execution of transactions.

#### **To comply with our legal obligations**

The legal basis for using your data is to comply with our legal and regulatory obligations, e.g. in confirming your identity and age, under our Central Bank authorisations, our interactions with the Data Protection Commission, Financial Services and Pensions Ombudsman, Revenue, Pensions Authority and law enforcement agencies, and when conducting Anti-Money Laundering checks.

#### **Based on your consent**

We use your data where you have agreed or explicitly consented to the using of your data in a specific way. You may withdraw your consent at any time.

#### **To protect your “vital interests”**

We may use your data if necessary to protect your “vital interests” or those of another natural person in exceptional circumstances e.g. where we suspect a fraud may be in the course of perpetration.

#### **As part of balancing interest**

Data may also be used for our legitimate interests (which you may object to) such as managing our business and meares to develop and improve our products and services, providing service information, conducting marketing activities, training and quality assurance, strategic planning, assertion of legal claims and defence during legal disputes and guaranteeing IT security and safeguarding IT operations at BTL.

### **5. How we use automated processing or “analytics”**

We may analyse your information using automated means:

- to help us understand your needs and develop our relationship with you;
- to help us to offer you products and service information we believe will be of interest to you, providing that you have given us consent to use your data for this purpose;
- by using product providers IT systems and similar systems where you apply for a financial or investment product.

The types and sources of the information we process by automated means about you are listed in Section 2 above.

We also use automated processing to assist in compliance with our legal obligations in connection with prevention of money laundering, fraud and terrorist financing.

## **6. Who we share your information with**

Your personal data will only be shared with third parties where it is necessary for us to provide our products and services to you. When providing our services to you, we may share your information with:

- your authorised representatives;
- your financial advisor;
- financial institutions;
- third parties and product providers with whom we need to share your information to facilitate transactions, services, investments etc. you have requested service providers and contractors who provide us with support services;
- statutory and regulatory bodies where we are legally obliged to do so;
- pension fund administrators;
- pensions scheme trustees or your employer in relation to the provision of pension benefits, where applicable;
- associated companies, with your consent.

## **7. How long we hold your data**

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, Office of the Data Protection Commission, Financial Services and Pensions Ombudsman. The timescales may also depend on the type of, investment or pension product provided to you. Our aim is to hold your data for no longer than is necessary and subject then to the timescales imposed by our legal obligations.

## **8. Implications of not providing your data**

If you do not provide information we may not be able to:

- provide requested products or services to you;
- continue to provide and/or renew existing products or services.

## **9. Transfer of information outside the European Economic Area (EEA)**

It is our aim to retain any information which we hold within the EEA. However, given the nature of our business relationships with certain product providers, such providers may have legitimate business reasons to transfer information to countries outside the EEA. Some of these jurisdictions offer differing levels of protection of personal information, not all of which may be as high as Ireland.

## **10. Data Subject Rights - How to exercise your rights**

Under the GDPR you will have additional rights in relation to how your data is used, including the rights to:

- find out if we hold your information, use your information, access your information, and receive copies of your information;
- have inaccurate or incomplete information corrected and updated;
- object to particular use of your personal data for our legitimate business interests or direct marketing purposes;

- to have your information deleted or our use of your data restricted, in certain circumstances;
- not to be subject to solely automated decisions in certain circumstances, and where we make such automated decisions, a right to have a person review the decision;
- exercise the right to data portability i.e. obtain a transferable copy of certain information we hold or to transfer the data to another provider; and
- withdraw consent at any time for processing of your data, based on content of data.

If you wish to exercise any of your rights you can contact us at the address shown.

If we are unable to deal with your requests for data access fully within a calendar month we may extend this period by a further two calendar months and explain the reason why. If you make your request electronically, we will try to provide you with the relevant information electronically.

### **11. Website**

You do not need to register your personal information in order to use our website. You may submit personal information by filling out the 'Contact us' form, clicking the email link or by entering your email address into the contact us field.

If you submit personal information to the website, the information will be used for the purposes you requested. The information may be stored and maintained. We will use your personal data only for the purpose for which it was collected, unless we obtain your specific consent to other uses, or unless otherwise required or permitted by law.

It is Bespoke Trustees Limited policy to limit the information collected to only the minimum information required to complete a website visitor's request.

BTL do not intend to seek any special categories of data through our website.

The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required to fulfil our contractual obligation to you or to comply with statutory requirements.

By using our website and submitting information to us you are agreeing to the collection and use of your information as described in this Privacy Notice.

### **12. Complaints**

If you are dissatisfied with our services or how we use your data, you have the right to complain to the Data Protection Commission, contact details as follows:

Address: Office of the Data Protection Commission, Canal House, Station House, Portlaoise, R32, AP23, Co. Laois.  
Telephone: 076 1104800 or Lo Call Number 1890 252 231  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
Website: [www.dataprotection.ie](http://www.dataprotection.ie)

### **13. Updates**

We will update this notice from time to time. You may request copies of our current notice at any time or refer to our website [www.bespoketrustees.ie](http://www.bespoketrustees.ie) for the latest versions of these documents.

#### **14. Our Contact Details**

Bespoke Trustees Limited

16 Roden Place, Dundalk, Co.Louth

Telephone no: 0818 432 432

Email address: [info@bespoketrustees.ie](mailto:info@bespoketrustees.ie)

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