

V1 5/18

Privacy Notice

Introduction

Sebastian & St James International Financial Advisers Limited is committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of Sebastian & St James International Financial Advisers Limited in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Sebastian & St James International Financial Advisers Limited
- Pembroke Hall, 38/39 Fitzwilliam Square, Dublin 2
- info@ss-ifa.com
- +353 (1) 2343171
- When we refer to 'we' it is Sebastian & St James International Financial Advisers Limited

Please read this Statement carefully as this sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Who are we?

Sebastian & St James International Financial Advisers Limited is the organisation responsible for the processing of your personal information. This means that we are a "data controller" under the General Data Protection Regulation (also known as the GDPR).

Purpose for processing your data

The personal data you have provided includes:

- Name, address, date of birth and gender
- Contact details including telephone numbers and email address
- Financial information
- Details about your family and dependents e.g. your marital status and number of children
- Information about your lifestyle and living circumstance e.g. your employment details and home ownership

So that we can recommend suitable products or services for you, it is important for us to gather information that is up-to date, accurate and complete, via a fact find.

The data from the fact find will be used to provide you with personal financial advice and recommendations suitable for your particular circumstances.

Registered Office

Pembroke Hall, 38/39 Fitzwilliam Square, Dublin 2
Telephone + 353 (1) 2343171 Email info@ss-ifa.com

www.ss-ifa.com

Why we are processing your data? Our legal basis.

In order for Sebastian & St James International Financial Advisers Limited to provide you with suitable financial products or services we need to collect personal data to provide personal financial advice and recommendations. Our lawful basis for processing your data under the GDPR is:

Legal basis – is your consent to providing the data for the purposes described above.

In any event, Sebastian & St James International Financial Advisers Limited are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

How will Sebastian & St James International Financial Advisers Limited use the personal data it collects about me?

Sebastian & St James International Financial Advisers Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary.

Special Categories of personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin) we will obtain your explicit consent

Who are we sharing your data with?

We might share your personal data with third parties, in limited circumstances. Predominantly that sharing is carried out with financial services product providers. This is to ensure that our services and any appropriate recommendations for financial products are provided and administered successfully, and in compliance with our regulatory and professional obligations.

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfill the service they provide on your behalf. When they no longer need your data to fulfill this service, they will dispose of the details in line with GDPR procedures.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

Data Subjects Rights:

We facilitate your rights, as our clients, in line with our data protection policy and the subject access request procedure. This is available on request.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.

- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** – in the event that Sebastian & St James International Financial Advisers Limited refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data.

Additional information we are providing you with to ensure we are transparent and fair with our processing

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. We will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body, the Central Bank of Ireland, and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Sebastian & St James International Financial Advisers Limited, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Sebastian & St James International Financial Advisers Limited's data protection representatives.

Failure to provide further information

If we are collecting your data for a financial contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

Additional Processing

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us:

Sebastian & St James International Financial Advisers Limited
Pembroke Hall, 38/39 Fitzwilliam Square, Dublin 2
info@ss-ifa.com
+353 (1) 2343171

Privacy policy statement changes

Sebastian & St James International Financial Advisers Limited may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services you agree to this privacy policy.