

PRIVACY NOTICE

Argeau Holdings Limited (“Argeau”) is committed to protecting and respecting your privacy.

To provide you with relevant information, respond to your queries, we sometimes request that you provide us with information about yourself. Argeau will identify itself on web pages and in correspondence.

This Privacy Notice will inform you of the information we gather and how it is used. Argeau maintains the same privacy practices with respect to data that is collected off-line and this notice also covers those methods of data collection and use. Argeau complies with the General Data Protection Regulation (GDPR) in the way we collect use and retain personal data.

For the purposes of the GDPR the data controller is:

- Contact: Adam Cleland
- Address: Argeau Holdings Limited, 20 Hatch Street Lower, Dublin, D02 XH02,
- Office Phone Number: 01 969 4444
- Email: adam.cleland@argeau.com

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) is processed.

Who we are

Argeau is a provider of financial technology and advisory services. Founded in 2020, Argeau’s mission is to empower individuals and families of significant wealth to more effectively manage and oversee their assets.

Purpose for processing your data

In order to provide our services, we are obliged to collect and process information about our clients including their names and addresses and details of their assets and liabilities. The level of information we gather will be appropriate to the nature and complexity of the product or service being provided. Without this key information we would not be able to provide our client with a professional service.

Why do we need to collect and store personal data? Our Legal Basis

In order to provide you with the services we have contracted to provide, Argeau needs to collect personal data about you. We need to collect certain personal data to meet our legal obligations. Where you provide us with contact details e.g. address, phone number, email address etc. this will be taken as consent to contact you by these means to provide services.

Our lawful reason for processing your data under the GDPR is:

- Consent: You have agreed or explicitly consented to the using of your data in a specific way. Consent is implicit through the client’s signature of our Terms of Business. You may withdraw your consent at any time.
- Performance of a Contract: Where use is necessary in relation to a service or contract you have entered into.

- Legal or Regulatory Obligation: Where use is necessary because we have to comply with a legal or regulatory obligation such as e.g. complying with anti-money laundering customer due diligence requirements.

In any event, Argeau is committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy.

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 to processing this data.

How will Argeau use the personal data it collects about me?

Argeau 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 endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

Who are we sharing your data with?

When providing our services to you, we may share your information with:

- Your authorised representatives;
- Third parties with whom we need to share your information to facilitate transactions you have requested;
- Service providers who provide us with support services;
- Statutory and regulatory bodies (including central and local government) and law enforcement authorities;
- To take advice from our external legal and other advisors;

We may pass your personal data on to third-party service providers contracted to Argeau in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with their data protection 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.

If we transfer personal data to a third party or outside the EU we as the data controller will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available.

Data Subjects Rights

Argeau facilitates you, our clients, rights 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 and to require us 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 you have a right to restrict the processing of your personal data.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation, subject to certain exemptions.
- **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 to object to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that Argeau refuses your request under rights of access, we will provide you with a reason 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 it was obtained. Argeau will process personal data in accordance with our retention schedule. How long we retain your data for is subject to legislative and regulatory requirements.

Withdraw consent: If we are relying on your consent to process your data you can withdraw this at any time – this does not affect the lawfulness of processing based on your consent before its withdrawal.

Complaints: In the event that you wish to make a complaint about how your personal data is being processed by Argeau or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Argeau’s data protection representative, Adam Cleland. If you wish to make a complaint you may do so in person, by telephone, in writing and by email. Please be assured that all complaints received will be fully investigated. You can also contact the Data Protection Commission at www.dataprotection.ie

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

- Provide requested services to you
- Continue to provide and/or renew existing services

Profiling – automatic decision making: Automated decision-making and Profiling are techniques often used in the financial services sector to both streamline processes and to measure risks or identify opportunities. Argeau does not carry out client profiling or engage in automatic decision making.

Additional Processing: If we intend to further process your personal data for a purpose other than for which the data was collected, we will notify you in advance.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (01) 969 4444 or email adam.cleland@argeau.ie

Privacy Notice Changes

Argeau may change this Privacy Notice 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 are aware of any changes. By using our services, you agree to this privacy policy. This privacy policy was last reviewed in June 2020.