



DATA PRIVACY NOTICE





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This is your guide to how personal data is managed by BCP Asset Management DAC, its subsidiaries BCP Fund Management DAC and Relko Nominees DAC; and its holding company BCP Private Clients DAC.

Please read it carefully.

It is important that you know exactly what we do with the personal information you and others provide to us, why we gather it and what it means to you. This document outlines our approach to Data Privacy to fulfil our obligations under the General Data Protection Regulation (2018). We also welcome it as an opportunity to reassure you of the importance we place on keeping your personal data secure, and of the strict guidelines we apply to its use. We want you to have a clear understanding of:

1. Who we are.
2. The information we collect about you.
3. When and how we collect information about you.
4. How we use your information.
5. Who we share your information with.
6. How long we hold your information.
7. Implications of not providing information.
8. The legal basis for using your information.
9. How to exercise your information rights (including the right to object).
10. How to contact us and/or our Data Protection Team & exercise your rights
11. Changes to this notice.



PART 1 WHO WE ARE

- 1.1 This privacy notice (the “Privacy Notice”) applies to all personal information processing activities carried out by BCP Asset Management DAC, its subsidiaries BCP Fund Management DAC and Relko Nominees DAC; and its holding company BCP Private Clients DAC.
- 1.1.1 BCP Asset Management DAC is a private company limited by shares. BCP Asset Management DAC is a data controller in respect of personal information that we process in connection with our business (including the products and services that we provide). In this notice, references to “we”, “us” or “our” are references to BCP Asset Management DAC, its subsidiaries BCP Fund Management DAC and Relko Nominees DAC; and its holding company BCP Private Clients DAC.
- 1.1.2 Our principal address is BCP Asset Management DAC, 71 Upper Leeson Street, Dublin 4 and our contact details can be located at www.bcp.ie
- 1.1.3 We respect individuals’ rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business. “Personal information” means information about a living individual who can be identified from that information (either by itself or when it is combined with other information). We may update our Privacy Notice from time to time, by communicating such changes to you and publishing the updated Privacy Notice on our website www.bcp.ie/privacy. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

PART 2 THE INFORMATION WE COLLECT ABOUT YOU

- 2.1 We collect and process various categories of personal information at the start of and for the duration of your relationship with us. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice. Personal information may include:
- 2.1.1 basic personal information, including name and address, date of birth and contact details, professional qualifications and where relevant professional experience;
- 2.1.2 your Personal Public Service Number (PPSN) where required by law or Tax Reference Number (TRN);
- 2.1.3 financial information, including account and transactional information and history;
- 2.1.4 information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin and contact details);
- 2.1.5 information about your financial circumstances, including personal wealth, assets and liabilities, investment experience, proof of income and expenditure, credit and borrowing history and needs and goals;
- 2.1.6 education and employment information;
- 2.1.7 goods and services provided; and
- 2.1.8 visual images and personal appearance (such as copies of passports/driving licences)



2.2 Information you provide to us about others or information provided by others about you.

If you give us information about someone else (for example, information about a spouse or financial associate provided during the course of a joint application with that person), or someone gives us information about you, we may add it to any personal information we already hold and we will use it in the ways described in this Data Privacy Notice.

Before you disclose information to us about another person, you should be sure that you have their agreement to do so. You should also show them this Data Privacy Notice. You need to ensure they confirm that they know you are sharing their personal information with us for the purposes described in this Data Privacy Notice.

2.3 Special categories of data

We may hold information about you which includes special categories of personal data, such as health or criminal conviction information. We will only hold this data when we need it for the purposes of the product or services we provide to you or where we have a legal obligation to do so. Examples of when we use this type of data include:

Medical information, for example, where you apply for life insurance, income protection, mortgage protection or investment products.

If you have criminal convictions, we may process this information in the context of compliance with our anti-money laundering obligations.

2.4 Information which you have consented to be used by us

2.4.1 Your agreement to allow us contact you through certain channels to offer you relevant products and services.

2.4.1 Information from online activities.

- We collect information about your internet activity using technology known as cookies, which can often be controlled through internet browsers. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy, which is available on our website.
- We collect information about your internet browser settings or otherwise Internet Protocol (IP) and other relevant information to help us identify your geographic location when providing you with our services.

2.5 Other personal information

2.5.1 Telephone recordings.

2.5.1 Information in relation to data access, correction, restriction, deletion, porting requests and complaints.

2.6 Sometimes we may collect and use your information even though you are not a customer of ours

2.6.1 For example, you may be a beneficiary, director or representative of one of our customers, or you may be in the process of making an application for a BCP product or service. In other cases, your own circumstances may have a material impact on the ability of our customer to perform their obligations to us, and we will need to consider these. If so, we will apply the principles outlined in this Data Privacy Notice when dealing with your information.



PART 3 WHEN AND HOW WE COLLECT INFORMATION ABOUT YOU

- 3.1 As you use our services, apply for products, make enquiries and engage with us, information is gathered about you. We may also collect information about you from other people and other parties, for example, when you are named in an investment application.
- 3.2 When we collect information about you:
- 3.2.1 When you ask us to provide you with certain products and services. For example, Investment or insurance products may require us to collect relevant health information from you.
 - 3.2.2 When you use our website and online services provided by us and visit our office.
 - 3.2.3 When you or others give us information verbally or in writing. This information may be on application forms, in records of your transactions with us, telephone conversations on recorded line or if you make a complaint.

Please note: If you apply for or hold a financial product in joint names, you should only give personal information about someone else (for example, a joint applicant) with their permission.

PART 4 HOW WE USE YOUR INFORMATION

- 4.1 Whether we're using it to confirm your identity, to help in the processing of an application for a product or service or to improve your experiences with us, your information is always handled with care and the principles outlined in this Data Privacy Notice are always applied.
- 4.2 We use your information:
- To provide our products and services to you and perform our contract with you, we use your information to:
- 4.2.1 Establish your eligibility for our products and services.
 - 4.2.2 Manage and administer your accounts, policies, benefits or other products and services that we or our partners may provide you with.
 - 4.2.3 Process your applications.
 - 4.2.4 Contact you by post, phone, text message, email, using our online website or other means, but not in a way contrary to your instructions to us or contrary to law.
 - 4.2.5 Monitor and record our conversations when we speak on the telephone (for example, to check your instructions to us, to analyse, to assess and improve customer service and for training and quality purposes).
 - 4.2.6 Manage and respond to a complaint or appeal.
- 4.3 To manage our business for our legitimate interests
- To manage our business we may use your information to:
- 4.3.1 Provide service information, to improve our service quality and for training purposes
 - 4.3.2 Conduct marketing activities
- For example, running competitions and direct marketing (provided that you have not objected to us using your details in this way), and research, including customer surveys.



4.4 To run our business on a day to day basis including to:

- 4.4.1 Carry out strategic planning and business portfolio management.
- 4.4.2 Compile and process your information for audit, statistical or research purposes (including, in some instances, making your data anonymous) in order to help us understand trends in our customer behaviour and to understand our risks better, including for providing management information, operational and data risk management.
- 4.4.3 Protect our business, reputation, resources and equipment, manage network and information security (for example, developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services) and prevent and detect fraud, dishonesty and other crimes (for example, to prevent someone trying to steal your identity).
- 4.4.4 Manage and administer BCP's legal and compliance obligations, including complying with Regulations and voluntary codes of practice to which we have committed.

4.5 To comply with our legal and regulatory obligations

We need to use your information to comply with legal and regulatory obligations including:

- 4.5.1 Complying with your information rights.
- 4.5.2 Providing you with statutory and regulatory information and statements.
- 4.5.3 Establishing your identity, residence and tax status in order to comply with law and regulation concerning taxation and the prevention of money laundering, fraud and terrorist financing.
- 4.5.4 We are required by law to screen applications that are submitted to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result, we may need to disclose information to government and other statutory bodies.
- 4.5.5 Preparing returns to regulators and relevant authorities including preparing DIRT, income tax, capital gains tax, capital acquisition tax and other revenue returns.
- 4.5.6 Complying with binding requests from regulatory bodies, including the Central Bank of Ireland and The Revenue Commissioners.
- 4.5.7 Complying with binding production orders or search warrants, and orders relating to requests for mutual legal assistance in criminal matters received from foreign law enforcement agencies/prosecutors.
- 4.5.8 For other reasons where a statutory requirement exists we do so, including use of your Personal Public Service (PPS) number (or foreign equivalent).
- 4.5.9 Complying with court orders arising in civil or criminal proceedings.
- 4.5.10 Performing a task carried out in the public interest.

4.6 Where you have given us permission (which you may withdraw at any time)

Where you have given us permission (which you can withdraw at any time) we may:

- 4.6.1 Send electronic messages to you about product and service offers.
- 4.6.2 Use cookies in accordance with our Cookie Policy.
- 4.6.3 Use special categories of data.

When we ask for your consent, we will provide you with more information on how we will use your data in reliance on that consent, including in relation to third parties we would like your consent to share your data with.



PART 5 WHO WE SHARE YOUR INFORMATION WITH

- 5.1 We only share your information with a select number of individuals and companies, and only as necessary. Sharing can occur in the following circumstances and/or with the following persons:
- 5.1.1 Your authorised representatives:
 - These include your broker/retail intermediary, attorney (under a Power of Attorney) and any other party authorised by you to receive your personal data.
 - 5.1.2 Third parties we need to share your information with in order to facilitate investments you have made (for example third party custodians) and those you ask us to share your information with.
 - 5.1.3 Companies in the BCP Group.
 - 5.1.4 When you open or use a joint account or product.
 - If you open or hold a joint account or product, this may mean that your personal data will be shared with the other applicant. For example, transactions made by you will be seen by your joint account holder, and you will see their transactions.
 - 5.1.5 Companies that provide support services for the purposes of protecting our legitimate interests.
 - Your personal information remains protected when our service providers use it. We only permit service providers to use your information in accordance with our instructions, and we ensure that they have appropriate measures in place to protect your information.
 - Our service providers include investment companies, IT and telecommunication service providers, software development contractors, data processors, computer maintenance contractors, printing companies, document storage and destruction companies, custodians and providers of administration services, archiving services suppliers, auditors and consultants, including legal advisors.
 - 5.1.6 We may also share information with the following third parties to help us manage our business for our legitimate interests:
 - Trade associations and professional bodies.
 - Pension fund administrators, trustees of collective investment undertakings and pensions trustees.
 - Authorised persons making an enquiry or complaint.
 - 5.1.7 Statutory and regulatory bodies (including central and local government) and law enforcement authorities.

These include the courts and those appointed by the courts, government departments, statutory and regulatory bodies in all jurisdictions where BCP operates including: the Central Bank of Ireland, the European Central Bank, the Data Protection Commission, Financial Services Ombudsman, An Garda Síochána/police authorities/enforcement agencies, Revenue Commissioners, Criminal Assets Bureau, US, EU and other designated authorities in connection with combating financial and other serious crime, police forces and security organisations, ombudsmen and regulatory authorities, as well as fraud prevention agencies.



PART 6 HOW LONG WE HOLD YOUR INFORMATION

6.1 The length of time we hold your data depends on a number of factors, such as regulatory rules and the type of financial product/service we have provided to you.

Those factors include:

6.1.1 The regulatory rules contained in laws and regulations or set by authorities like the Central Bank of Ireland, for example, in the Consumer Protection Code.

6.1.2 The type of financial product/service we have provided to you. For example, we may keep data relating to a pension product for a longer period compared to data regarding an investment product.

6.1.3 Whether you and us are in a legal or some other type of dispute with another person or each other.

6.1.4 The type of data we hold about you.

6.1.5 Whether you or a regulatory authority asks us to keep it for a valid reason.

As a general rule, we keep your information for a specified period after an investment has matured/encashed or you cease to be a customer of BCP. In most cases this period is six (6) years.

PART 7 IMPLICATIONS OF NOT PROVIDING INFORMATION

7.1 Sharing information with us is in both your interest and ours.

7.2 We need your information in order to:

7.2.1 Provide products and services to you and fulfil our contractual obligations to you.

7.2.2 Manage our business for our legitimate interests.

7.2.3 Comply with our legal and regulatory obligations.

Of course, you can choose not to share information, but doing so may limit the services we are able to provide to you.

7.3 We may not be able to provide you with certain products and services that you request. We may not be able to continue to provide you with or renew existing products and services.

7.4 We may not be able to assess your suitability for a product or service, or, where relevant, provide you with a recommendation to proceed with a financial product or service.



PART 8 THE LEGAL BASIS FOR USING YOUR INFORMATION

- 8.1 We will use your data and share that data where:
- 8.1.1 Its use is necessary in relation to a service or a contract that you have entered into or because you have asked for something to be done so you can enter into a contract with us.
 - 8.1.2 Its use is in accordance with our legitimate interests outlined in this notice.
 - 8.1.3 Its use is necessary because of a legal obligation that applies to us (except an obligation imposed by a contract).
 - 8.1.4 You have consented or explicitly consented to the using of your data (including special categories of data) in a specific way.
 - 8.1.5 Its use is necessary to protect your "vital interests".
 - In exceptional circumstances we may use and/or disclose information (including special categories of data) we hold about you to identify, locate or protect you, for example, if it comes to our attention that you are in imminent physical danger and this information is requested by An Garda Síochána or your relative.
 - 8.1.6 Where you have made clearly special categories of data about yourself public.
 - 8.1.7 Where the processing of special categories of data is necessary for the establishment, exercise or defence of legal claims.
 - 8.1.8 Where authorised by law or regulation, we may undertake processing of special categories of data for a substantial public interest.
 - 8.1.9 Where the processing of criminal conviction data is authorised by EU or Irish law.

PART 9 HOW TO EXERCISE YOUR INFORMATION RIGHTS (including the right to object)

- 9.1 Providing and holding personal information comes with significant rights on your part and significant obligations on ours. You have several rights in relation to how we use your information. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise:
- 9.2 You have the right to:
- 9.2.1 Request a copy of any "personal data" that we hold in relation to you.
 - 9.2.2 Request that inaccurate information is corrected and incomplete information updated.
 - 9.2.3 Object to particular uses of your personal data where the lawful basis for our use of your data is our legitimate business interests. However, doing so may have an impact on the services and products we can / are willing to provide.
 - 9.2.4 Object to use of your personal data for direct marketing purposes. If you object to this use, we will stop using your data for direct marketing purposes.
 - 9.2.5 Have your data deleted or its use restricted – you have a right to this under certain circumstances.



For example, where you withdraw consent you gave us previously and there is no other legal basis for us to retain it, or where you object to our use of your personal information for particular legitimate business interests.

- 9.3 Obtain a transferable copy of certain data to which can be transferred to another provider, known as “the right to data portability”.
 - This right applies where personal information is being processed based on consent or for performance of a contract and the processing is carried out by automated means. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access. The right also permits the transfer of data directly to another provider where technically feasible. Therefore, depending on the technology involved, we may not be able to receive personal data transferred to us and we will not be responsible for the accuracy of same.
- 9.4 Withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.
- 9.5 We are obliged to respond without undue delay. In most instances, we will respond within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons why. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you ask us otherwise.
- 9.6 You have the right to complain to the Data Protection Commission or another supervisory authority.
- 9.7 You can contact the Office of the Data Protection Commissioner at:

Website:	https://www.dataprotection.ie/docs/Contact-us/b/11.html
Telephone:	+353 (0)761 104 800 or Lo Call Number 1890 252 231
Fax:	+353 57 868 4757
E-mail:	info@dataprotection.ie
Postal Address:	Data Protection Commission, Canal House, Station Road, Portarlington, R32 AP23, Co. Laois.

PART 10 HOW TO CONTACT US AND/OR OUR DATA PROTECTION TEAM & EXERCISE YOUR RIGHTS

- 10.1 If you have any questions about how your personal data is gathered, stored, shared or used, or if you wish to exercise any of your data rights, please contact our Data Protection Team at

Telephone:	+353 (0)1 668 4688
E-mail:	Dataprotection@BCP.ie
Postal Address:	BCP, 71 Upper Leeson Street, Dublin 4



PART **11** CHANGES TO THIS NOTICE

11.1 This Data Privacy Notice is valid from 30 April 2018. Updates will be posted on our website, www.bcp.ie/privacy-policy, and may be posted or emailed directly to you at the last address for correspondence we have on our records for you.



BCP SERVING INVESTORS FOR NEARLY 50 YEARS

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BCP Asset Management DAC

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