

Privacy Notice/Statement

Introduction

Windsor Wealth Management Limited Trading as Earlyretirement.ie 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 Windsor Wealth Management Limited Trading as Earlyretirement.ie in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Windsor Wealth Management Limited Trading as Earlyretirement.ie
- Contact details of Windsor Wealth Management Limited Trading as Earlyretirement.ie are 01 681 5290 or hello@earlyretirement.ie.
- When we refer to 'we' it is Windsor Wealth Management Limited Trading as Earlyretirement.ie

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?

- *EarlyRetirement.ie is the trading name for Windsor Wealth Management which was originally founded in the 1980's. The company first traded in our current location of 29 Windsor Place over 25 years ago. At EarlyRetirement.ie, our goal is to help people secure the best possible future for themselves and their families at retirement*

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Name: Johnny Mulholland
- Email address: Johnny@earlyretirement.ie
- Phone number: 01 6815 290

Purpose for processing your data

Your personal data may be processed by the Firm (or any of its affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to facilitate the opening of your account with the Firm, the management and administration of your holdings and any related account, on an on-going basis necessary for the performance of your contract with the Firm, including without limitation, the processing of sales, purchases, transfers, corporate actions and the payment of distributions;
- to carry out anti-money laundering (AML) checks and related actions which the Firm considers appropriate to meet any legal obligations imposed on the Firm relating to the processing in the public interest or to pursue the Firm's legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with the Firm's anti-money laundering procedures;
- to conduct suitability and appropriateness assessments, where required in relation to the Services provided to you, in order to meet legal obligations imposed on the Firm;
- to report tax related information to tax authorities in order to comply with a legal obligation;
- to prevent and detect market abuse and related actions which the Firm considers appropriate to meet any legal obligations imposed on the Firm;
- to monitor and record calls and electronic communications for (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) for crime detection, prevention, investigation and prosecution, (iv) to enforce or defend the Firm and its affiliates', itself or through third parties to whom it delegates such responsibilities or rights in order to comply with any legal obligation imposed on the Firm, (v) to pursue the Firm's legitimate interests in relation to such matters or (vi) where the processing is in the public interest;
- to disclose information to other third parties such as service providers of the Firm, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on the Firm or in order to pursue the legitimate interests of the Firm;
- to monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of the Firm to improve its service delivery;
- to update and maintain records and fee calculations;
- to retain AML and other records of individuals to assist with the subsequent screening of them in pursuance of the Firm's and its clients' legitimate interests; and those which are necessary to comply with the Firm's legal obligations and/or which are necessary for the Firm's legitimate interests indicated above and/or where the processing is in the public interest

Why we are processing your data? Our legal basis.

In order for us to provide you Financial Services Windsor Wealth Management Limited Trading as Earlyretirement.ie need to collect personal data for Financial Services. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** - Windsor Wealth Management Limited Trading as Earlyretirement.ie needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract.

In any event, Windsor Wealth Management Limited Trading as Earlyretirement.ie 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 Windsor Wealth Management Limited Trading as Earlyretirement.ie use the personal data it collects about me?

Windsor Wealth Management Limited Trading as Earlyretirement.ie 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 – financial information is not classified as special categories of personal data) – we will ensure the below

- we will obtain your explicit consent

Who are we sharing your data with?

The Firm may share information with any of its affiliates, agents, employees, delegates or sub-contractors, tax authorities, Central Bank of Ireland and third parties such as service providers of the Firm, auditors, regulatory authorities and technology providers.

We may pass your personal data on to third-party service providers contracted to Windsor Wealth Management Limited Trading as Earlyretirement.ie 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 fulfill 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 Windsor Wealth Management Limited Trading as Earlyretirement.ie 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.

The third parties that we pass your personal data to are available on request.

We have issued all our third party processors with a Data Processor checklist asking them GDPR specific questions

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:

Windsor Wealth Management Limited Trading as Earlyretirement.ie facilitate 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 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 to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that Organisation Name 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. Windsor Wealth Management Limited Trading as Earlyretirement.ie will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (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 Windsor Wealth Management Limited Trading as Earlyretirement.ie or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Organisation Name's data protection representatives Data Protection Officer / GDPR Owner

Failure to provide further information

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

Profiling – automatic decision making

Profiling;

Windsor Wealth Management Limited Trading as Earlyretirement.ie use profiling in the business. The main categories are

- a) Risk profiling.
- b) Profiling for marketing purposes.
- c) Establishing affordability and providing quotations for financial services and mortgage product

a) Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customers attitude to various levels of risk having answered a series of questions.

- b) Profiling for marketing purposes.

When we seek to contact you about other services, as outlined above * we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

- c) Establishing affordability and providing quotations for financial services products

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. Windsor Wealth Management Limited Trading as Earlyretirement.ie, 29 Windsor Place, Dublin 2. Phone 01 681 5290 or email hello@earlyretirement.ie.

Privacy policy statement changes

Windsor Wealth Management Limited Trading as Earlyretirement.ie may change this privacy policy from time to time without prior notification. We therefore encourage users to familiarise themselves with the contents of this Privacy Statement on a regular basis.

Further information in respect of your rights is available at the website of the Office of the Data Protection Commissioner, www.dataprotection.ie.

This privacy policy was last reviewed in May 2018
