

Terms of Business

Clinch Wealth Management Ltd.

These Terms of Business set out the general terms under which our firm will provide business services to you and the respective duties and responsibilities of both the firm and you in relation to such services. Please ensure that you read these terms thoroughly and if you have any queries, we would be happy to clarify them. If any material changes are made to these terms, we will notify you.

Authorisation with the Central Bank of Ireland

Clinch Wealth Management is regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations 2018, as an Investment Intermediary authorised under the Investment Intermediaries Act 1995. Copies of our regulatory authorisations are available on request. The Central Bank of Ireland holds registers of regulated firms. You may contact the Central Bank of Ireland on 1890 777 777 or alternatively visit their website at www.centralbank.ie to verify our credentials.

Codes of Conduct

Clinch Wealth Management is subject to the Consumer Protection Code, the Minimum Competency Code and Fitness & Probity Standards which offer protection to consumers. These Codes can be found on www.centralbank.ie.

Our Services

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to pensions, PRSAs, investments, life insurance, transferable securities (shares & bonds) and UCITS, on a fair and personal analysis basis. A full list of insurers and product providers, we deal with, is available on request.

Fair and Personal Analysis

The concept of fair and personal analysis describes the extent of the choice of products and providers offered by an intermediary within a particular category of life assurance, general insurance and/or a specialist area. The number of contracts and providers considered must be sufficiently large to enable an intermediary to recommend a product that would be adequate to meet client needs.

The number of providers that constitutes 'sufficiently large' will vary depending on the number of providers operating in the market for a particular product or service and their relative importance in and share of that market. The extent of fair analysis must be such that could be reasonably expected of a professional conducting business, taking into account the accessibility of information and product placement to intermediaries and the cost of the search.

In order to ensure that the number of contracts and providers is sufficiently large to constitute a fair and personal analysis of the market, we will consider the following criteria:

- the needs of the customer,
- the size of the customer order,
- the number of providers in the market that deal with brokers,
- the market share of each of those providers,
- the number of relevant products available from each provider,
- the availability of information about the products,
- the quality of the product and service provided by the provider,
- cost and any other relevant consideration.

Investments may fall as well as rise in value and income may fluctuate in accordance with market conditions and taxation arrangements. Clinch Wealth Management Ltd has taken reasonable care to ensure the accuracy of information herein but does not guarantee the accuracy of such information. Clinch Wealth Management Ltd is not a tax or legal advisor and cannot accept any responsibility for the tax or legal affairs of its clients so clients are advised to seek independent tax and legal advice.

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Directors: Tom Clinch, Andrew O'Donohoe, Michele McGuirk, Conor Walsh

Sustainability Factors – Pension & Investment Advice

We offer a range of investment options that take Environmental, Social & Governance (ESG) factors into account. We have a proactive process to determine whether our clients wish to allocate some of their assets to these funds. As part of our fund research, we assess the ESG credentials of available funds to determine their suitability for our clients. In recommending funds, the firm will at all times act in the client's best interests and keep clients informed accordingly, bearing in mind that ESG factors can impact on investment returns.

Remuneration policy

We are remunerated by fees and commission from financial institutions. When assessing products, we will consider the different approach taken by financial institutions to integrate ESG factors into their fund offerings. This will form part of our analysis for choosing a suitable financial product.

Investment Intermediary Services

We are remunerated by commission for our investment intermediary services.

Insurance based Investment Products

We are remunerated by commission for the advice we provide on our insurance-based investment products.

Pensions & Life Insurance / Deposits & Life Wrapped Investments

Clinch Wealth Management provides pensions & life insurance advice on a fair and personal analysis basis i.e. providing services on the basis of a sufficiently large number of contracts and product providers available in the market to enable us to make a recommendation, in accordance with professional criteria, regarding which contract would be adequate to meet your needs.

We will provide assistance to you for any queries you may have in relation to the policies or in the event of a claim during the life of the policies and we will explain to you the various restrictions, conditions and exclusions attached to your policy. However, it is your responsibility to read the policy documents, literature and brochures to ensure that you understand the nature of the policy cover; particularly in relation to Permanent Health Insurance (PHI) and serious illness policies.

Specifically on the subject on PHI policies, we will explain to you; a) the meaning of disability as defined in the policy; b) the benefits available under the policy; c) the general exclusions that apply to the policy; and d) the reductions applied to the benefit where there are disability payments from other sources.

For serious illness policies, we will explain clearly to you the restrictions, conditions and general exclusions that attach to the policy.

Statement of Charges - Life, Pensions & PRSAs

We charge an initial fee for selecting and arranging the investment. We also charge an on-going fee for monitoring your financial products, completing suitability assessments and meeting you to review your portfolio on a regular basis. Our fees are disclosed in line with regulatory requirements. We are remunerated by commission and other payments from product providers on the completion of business.

In certain circumstances, it will be necessary to charge a fee for services provided. In other circumstances where fees are chargeable or where you choose to pay in full for our service by fee, we will notify you in writing in advance and agree the scale of fees to be charged. Where it is not possible to provide the exact amount, we will provide you the method of calculation of the fee.

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Additional fees may be payable for complex cases or to reflect value, specialist skills or urgency, our scale of fees for such cases range from a minimum of €250 per hour to a maximum of €500 per hour. We will notify you in advance and agree the scale of fees to be charged.

A summary of the details of all arrangements for any fee, commission, other reward or remuneration paid or provided to us which we have agreed with product providers is available on our website – www.clinch.ie

Ongoing suitability

Investments: Ongoing suitability assessments form part of the service to clients. On an annual basis we will issue a client report outlining changes in the services or instruments involved and or the circumstances of the client.

Insurance based Investment Products: We will provide periodic assessments of the suitability of the insurance based investment product which we have recommended to you.

Regular Reviews

It is in your best interests that you review, on a regular basis, the products which we have arranged for you. As your circumstances change, your needs will change. You must advise us of those changes and request a review of the relevant policy so that we can ensure you are provided with up to date advice and products best suited to your needs. Failure to contact us in relation to changes in your circumstances or failure to request a review, may result in you having inappropriate investments and/or insufficient insurance cover.

Consumers: Duty of Disclosure when completing documentation for new business / renewals and midterm adjustments

Section 14 (1) – (5) of the Consumer Insurance Contracts Act which is effective from 1st September 2021 alters consumers duty of disclosure:

- You are required to answer all questions posed by us or the insurer honestly and with reasonable care – the test will be that of the ‘average consumer’. Average consumer as per Directive No. 2005/29/EC of the European Parliament and of the Council of 11 May 2005 is reasonably well informed and reasonably observant and circumspect, taking into account social, cultural and linguistic factors.
- Specific questions will be asked. Where you do not provide additional information (after being requested to do so) it can be presumed that the information previously provided remains unchanged.

An insurer may repudiate liability or limit the amount paid on foot of the contract of insurance, only if it establishes that non-disclosure of material information was an effective cause of the insurer entering into the relevant contract of insurance and on the terms on which it did.

Completed proposal forms / statement of fact

Completed proposal forms or Statements of Facts will be provided to you. These are important documents as they form the basis of insurance contract between the insurer and you the consumer. You should review and confirm that the answers contained within are true and accurate.

Commercial Customers: Non-Consumer Disclosure of Information

It is essential that you should bring to our attention any material alteration in risk such as changes of address or use of premises. Any failure to disclose material information may invalidate your claim and render your policy void.

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Conflicts of Interest

It is the policy of our firm to avoid conflicts of interest in providing services to you. However, where an unavoidable conflict of interest arises, we will advise you of this in writing before providing you with any service. A full copy of our conflicts of interest policy is available on request.

Default of payments by clients

Product providers may withdraw benefits or cover in the event of default on payments due under policies of insurance or other products arranged for you. We would refer you to policy documents or product terms for the details of such provisions.

In the event of default by a client in respect of money due to Clinch Wealth Management, we reserve the right to pursue our legal rights and remedies.

Handling Client Funds

It is our policy not to accept cash or cheques made out to Clinch Wealth Management. In certain circumstances, we may handle cash or cheques as provided for in law.

Timing of Transactions

All client transactions are dealt with promptly. In accordance with industry practice they may take a number of working days depending on the complexity of the instruction. If you have a specific tax or investment deadline it is your responsibility to submit the instruction to us with sufficient advance notice to ensure the deadline is met.

Complaints

Whilst we will accept verbal complaints, it would be preferable that any complaints are made in writing. Any complaint will be recorded and acknowledged within 5 business days and thoroughly investigated. We shall investigate the complaint in a timely manner and the complainant will receive an update on the complaint at intervals of not greater than 20 business days starting from the date on which the complaint is made. On completion of our investigation, we will provide you with a written report of the outcome. In the event that you are still dissatisfied with our handling of or response to your complaint, you are entitled to refer the matter to the Financial Services & Pensions Ombudsman (FSPO). A full copy of our complaints procedure is available on request.

Data Protection

Clinch Wealth Management are subject to the requirements of the General Data Protection Regulation (GDPR) 2018 and the Irish Data Protection Act 2018.

Clinch Wealth Management 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 GDPR in relation to, not only processing your data but, ensuring you understand your rights as a client.

The data will be processed only in ways compatible with the purposes for which it was given and as outlined in our Privacy Notice, this will be given to all our clients at the time of data collection.

It is our policy to operate procedures to the highest standards of client confidentiality and to meet our statutory requirements under the GDPR 2018 and the Irish Data Protection Act 2018.

You have given us personal information in order that we can provide advice to you. Information provided to Clinch Wealth Management may be passed to your accountant, solicitor, mortgage broker or other advisor for the purposes of looking after your financial interests at your request. Our staff and support service providers will only use this information to provide you with a range of pension, investment, insurance, taxation advice and other services best suited to your needs or as otherwise required by law.

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We will ensure this Privacy Notice is easily assessable. Please refer to our website www.clinch.ie if this medium is not suitable we will ensure you can easily receive a hard copy by post or by email.

Please contact us at info@clinch.ie if you have any concerns about your personal data.

The following sections apply to consumer duties and rights arising out of the Consumer Insurance Contracts Act 2019 which was implemented to protect consumers. Non-Consumer Commercial clients have no duties and rights under this Act, and therefore the following sections do not apply to them.

New Business & Renewal

A consumer may cancel a contract of insurance, by giving notice in writing to the insurer, within working 14 days after the date the consumer was informed that the contract is concluded. This does not affect the notice periods already provided under European Union (Insurance and Reinsurance) Regulations 2015 (S.I. No. 485 of 2015) or the European Communities (Distance Marketing of Consumer Financial Services) Regulations 2004 (S.I. No. 853 of 2004) which is 30 days in respect of life policies, irrespective of whether the sale took place on a non-face to face basis.

The giving of notice of cancellation by you will have the effect of releasing you from any further obligation arising from the contract of insurance. The insurer cannot impose any costs on you other than the cost of the premium for the period of cover.

This right to cancel does not apply where, in respect of life insurance the contract is for a duration of six months or less.

The consumer is under a duty to pay their premium within a reasonable time, or otherwise in accordance with the terms of the contract of insurance.

A court of competent jurisdiction can reduce the pay-out to the consumer where they are in breach of their duties under the Act, in proportion to the breach involved.

Post-Contract Stage and Claims

An insurer may refuse a claim made by a consumer under a contract of insurance where there is a change in the risk insured, including as described in an “alteration of risk” clause, and the circumstances have so changed that it has effectively changed the risk to one which the insurer has not agreed to cover.

Any clause in a contract of insurance that refers to a “material change” will be interpreted as being a change that takes the risk outside what was in the reasonable contemplation of the contracting parties when the contract was concluded.

The consumer must cooperate with the insurer in an investigation of insured events including responding to reasonable requests for information in an honest and reasonably careful manner and must notify the insurer of the occurrence of an insured event in a reasonable time.

The consumer must notify the insurer of a claim within a reasonable time, or otherwise in accordance with the terms of the contract of insurance.

If the consumer becomes aware after a claim is made of information that would either support or prejudice the claim, they are under a duty to disclose it.

If the consumer makes a false or misleading claim in any material respect (and knows it to be false or misleading or consciously disregards whether it is) the insurer is entitled to refuse to pay and to terminate the contract.

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Where an insurer becomes aware that a consumer has made a fraudulent claim, they must notify the consumer advising that they are avoiding the contract of insurance. It will be treated as being terminated from the date of the submission of the fraudulent claim. The insurer may refuse all liability in respect of any claim made after the date of the fraudulent act, and the insurer is under no obligation to return any of the premiums paid under the contract.

Compensation Scheme

Clinch Wealth Management is a member of the Investor Compensation Scheme established under the Investor Compensation Act 1998.

Investor Compensation Scheme

The Investor Compensation Act, 1998, provides for the establishment of a compensation scheme and for the payment, in certain circumstances, of compensation to certain clients (known as eligible investors) of authorised investment firms, as defined in the Act. The Investor Compensation Company Ltd. (ICCL) was established under the 1998 Act to operate such a compensation scheme and our firm is a member of this scheme.

Compensation may be payable where money or investment instruments owed or belonging to clients and held, administered or managed by Clinch Wealth Management cannot be returned to those clients for the time being and where there is no reasonably foreseeable opportunity of Clinch Wealth Management being able to do so.

A right to compensation will arise only:

- If the client is an eligible investor as defined in the Act; and
- If it transpires that the firm is not in a position to return client money or investment instruments owned or belonging to the clients of the firm; and
- To the extent that the client's loss is recognised for the purposes of the Act.

In the event that a right to compensation is established, the amount payable is the lesser of 90% of your loss which is recognised for the purposes of the Investor Compensation Act 1998; or compensation up to €20,000.

For further information, contact the Investor Compensation Company Ltd. at (01) 2244955.

Updated June 2021

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Privacy Notice

Introduction

Clinch Wealth Management Ltd (“Clinch Wealth Management”) 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 EU General Data Protection Regulation - 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 Notice to explain to you the information practices of Clinch Wealth Management in relation to the information we collect about you.

For the purposes of the GDPR the Data Controller is:

- Clinch Wealth Management
- Contact details of Clinch Wealth Management:
 - Email: info@clinch.ie
 - Phone: 01 441 9900
 - Address: Ferry House, 48/53 Lower Mount Street, Dublin 2
- When we refer to ‘we’ it is Clinch Wealth Management

Please read this Privacy Notice 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?

Clinch Wealth Management provides a personal wealth management service to some of Ireland's leading professionals and entrepreneurs. We provide holistic advice on pensions, investments and inheritance planning for private clients. All of our advice is given in the context of a tailored financial plan.

The GDPR Owner and Data Protection Representatives can be contacted:

- Email: info@clinch.ie
- Phone: 01 441 9900
- Address: Ferry House, 48/53 Lower Mount Street, Dublin 2

How do we collect your information and what information do we collect?

The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data.

Our organisation collects personal data in the following ways, if you:

- request a service from us e.g. financial advice on investments, pensions and inheritance planning
- contact us with a complaint or query.

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What information do we collect?

The information we collect about you includes the following:

1.	Contact and identifying information , e.g., name, address, contact details; email, mobile & landline.
2.	Unique identifiers e.g. <ul style="list-style-type: none"> • PPS number - the reason why we collect this will be at the request of the life company providing the product/service • Pension scheme or insurance policy numbers – the reason why we collect this will be as part of our Fact Find process and to provide advice on these products.
3.	Demographic details , age, gender, marital status, lifestyle and insurance requirements; date of birth, dependents, photo ID, as well as collecting personal information about you. We may also use personal information about other people, for example family members you wish to insure on a policy e.g. your children or spouse.
4.	Family and Beneficiary Data , e.g., dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney or details of Solicitor, Tax Advisor and/or Accountant.
5.	Employment information e.g., role, employment status (such as full, part time or contract), salary information, employment benefits and employment history. This information is necessary when completing our Fact Find process.
6.	Publicly available sources: e.g., Information about you in the public domain such as Director information from the Companies Registration Office.
7.	Health information such as information about your health status and medical assessment outcomes. We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol) and medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information, as required by life companies for protection cover products and for Fact Find purposes.
8.	Pensions and Insurance Benefits information such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions and Pension Adjustment Order (PAO).
9.	Financial details e.g., bank account details, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data.
10.	Searches that we undertake in relation to sanctions and money laundering via Dow Jones.

When our organisation collects sensitive personal data as defined within the GDPR, we will ensure that we require this information and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

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How do we use your personal data?

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for investment, protection, pension products, independent financial advice or quotes.

1.	Performing services for our clients and prospective clients – when you require pension/investment/protection products, we use your data to enable us to provide the required product.
2.	Statutory and other regulatory requirements – we are required to carry out various obligations which include but not limited to: <ul style="list-style-type: none"> • AML/Sanction checking • Knowing your customer “Fact Find” • Adherence to the Consumer Protection Code
3.	To contact you if required or to respond to any communications that you might send to us.
4.	Carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.
5.	Provide professional services we provide a personal wealth management service. We provide holistic advice on pensions, investments and inheritance planning for private clients.
6.	Handling complaints received in writing by email or to the address below.
7.	To notify you about changes to our service as appropriate.

Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data.

Performance of a contract	When we enter a contract with you, we will collect and use your personal data to enable us to fulfil that service.
Legal obligation	The use of some of your personal data is necessary for us to meet our legal obligations e.g., pension contributions for Revenue certificates, regulatory purposes to the Central Bank and other regulatory authorities.
Consent	Sometimes we may rely on consent as a legal basis for processing your information. This is used when we need to assess risk relating to an insurance policy for you. We share this information with other third parties where it is necessary to manage these services provided to you – these services include insurance underwriters, reinsurer and other insurance providers. Sometimes if you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.
Legitimate interests	Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.

If you require further information on any of the above basis for processing your data, please do not hesitate to contact us.

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How we share your data

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place confidentiality agreements.

1.	Insurance Partners where we need to manage the services provided to you, such as Product Providers and insurance underwriters, reinsurers, and loss adjuster. You can refer to their privacy statements on their website for more information about their privacy practices.
2.	Legal advisers, loss adjusters, and claims investigators where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature.
3.	Medical professionals , e.g., where you provide health information in connection with a claim against your insurance policy; or when we are providing a quote for insurance.
4.	EU Law enforcement bodies , when required to do so by law and/or regulation, or another legal request.
5.	Public authorities, regulators and government bodies , where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity.
6.	Third-party processors: We outsource our processing operations to suppliers that process personal information on our behalf. Examples include IT service providers who manage our IT and back-office systems and telecommunications networks, accounting and CRM providers. These processing operations remain under our control, and we have data processing agreements in place with all our third-party processors to ensure all processing is carried out in accordance with our security standards and GDPR.
7.	Internal and external auditors where necessary for the conduct of company audits or to investigate a complaint or security threat.
8.	On the sale or reorganisation of our business whether by asset or share disposal or other transaction relating to our business.

Transferring personal data outside of Ireland

If we transfer personal data to a country outside of the EEA (referred to in the GDPR as ‘third country,’) we will ensure it is done lawfully, i.e. there is an appropriate “level of protection for the fundamental rights of the data subjects”. We will therefore ensure that either the EU Commission has granted an adequacy decision in respect of the third country, or appropriate specified safeguards have been put in place, (e.g., Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs)).

Security

The security of your personal data is important to us. We have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

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Retention

Clinch Wealth Management shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

The retention period for each category of personal data will be set out in our Retention Schedule along with the criteria used to determine this period, including any statutory obligations we have. Should you require further information we would be happy to provide it.

We confirm personal data will be disposed of securely.

Data Subjects Rights:

Clinch Wealth Management will facilitate your 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 (the erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).
- **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.**
- **Right to make a complaint** – if we refuse 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.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Clinch Wealth Management or how your complaint has been handled, you have the right to lodge a complaint with our Data Protection Representatives or GDPR Owner.

You may also lodge a complaint with the Data Protection Commission (DPC) in Ireland, whose details are:

Data Protection Commission

21 Fitzwilliam Square South,

Dublin 2.

D02RD28

Web: www.dataprotection.ie

Email: info@dataprotection.ie

See website for updated contact details to reach the appropriate section within the DPC.

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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. When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

Profiling – automatic decision making

Clinch Wealth Management do not carry out Client Profiling or engage in automatic decision making.

Special Categories of personal data

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health data, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for insurance and pension purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

- a policy of insurance, life assurance or mortgage protection
- a policy of health insurance or health related insurance
- an occupational pension, a retirement annuity contract or any other pension arrangement

Joint Accounts

Clients who have sole and joint policies, living at the same address, will receive information relating to these policies in the one communication unless we receive a written instruction from either client to indicate otherwise.

Email

We will take one email address provided by either party of two clients that are married, in a legal partnership or have at least one joint policy or account, to be an acceptable correspondence address for data on either or both parties, unless we are provided with two email addresses or instructed otherwise.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this notice, please contact us on + 353 (01) 4419900, email us at info@clinch.ie or by post to Clinch Wealth Management Ltd, Ferry House, 48-53 Lower Mount Street, Dublin 2.

Privacy Notice changes

Clinch Wealth Management 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 Notice periodically, so you are aware of any changes. By using our services, you agree to this Privacy Notice.

*Effective from 25th May 2018
Updated July 2021*

Investments may fall as well as rise in value and income may fluctuate in accordance with market conditions and taxation arrangements. Clinch Wealth Management Ltd has taken reasonable care to ensure the accuracy of information herein but does not guarantee the accuracy of such information. Clinch Wealth Management Ltd is not a tax or legal advisor and cannot accept any responsibility for the tax or legal affairs of its clients so clients are advised to seek independent tax and legal advice.

Clinch Wealth Management Ltd is regulated by the Central Bank of Ireland. Company Registration No. 365742
Directors: Tom Clinch, Andrew O'Donohoe, Michele McGuirk, Conor Walsh