

PRIVACY NOTICE

Introduction

Santiago Investment Advisors 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 in relation to not only processing your data but ensuring you understand your rights as a client. This privacy notice explains when and why Santiago Investment Advisors collects personal data, how it is used, the condition under which it may be disclosed to others and how it is kept secure.

Who we are

We are Kalm Investments Ltd trading as Santiago Investment Advisors and we are an investment business firm authorised by the Central Bank under the Investment Intermediaries Act, 1995 to provide the services of an investment intermediary. For the purposes of GDPR Santiago Investment Advisors are the data controller and our contact details are:

Address: The Atrium, John's Lane, Naas Co. Kildare
Telephone: 045 906480
Email: data.privacy@santiagoinvestmentadvisors.ie

What personal information do we collect and why?

We collect data about you when you apply for our services and for products provided by product producers with whom we have an agency agreement. We also collect data about you at our subsequent review meetings. Data is collected only to provide you with investment advisory services, to open accounts with product providers and to comply with relevant laws and regulations, including internal operating procedures and compliance checks.

We may collect data under a number of categories, including:

- Identification & Contact Information, including your Name, Date of Birth, Gender, Marital Status, PPS Number, Address, Email Address, Home Phone Number, Work Phone Number, Mobile Number
- Financial Details & Financial Information, including your Occupation, Job Title, Total Remuneration, Employment Details, Existing Pension Benefits, Employer Name, Bank Details, Tax Residence, your Income, Assets and Liabilities.

The consent for the lawful basis for controlling and processing (i.e. collect, store & use) your personal information is given when you apply for the services of investment advice and/or products of our product providers and enter into a contract with us to provide you with services.

We also have a legal obligation to control and process your personal information to comply with Central Bank of Ireland regulations, for which you also give consent at application stage.

Sharing your data

We will keep your personal data confidential but may pass it on to third-party services contracted to Santiago Investment Advisors 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.

We may also share your data with regulatory and other governmental bodies where required by or under any enactment or rule of law or court order, including, but not limited to, the Revenue Commissioners, An Garda Síochána, the Companies Registration Office, the Incorporated Law Society, the Irish Taxation Institute, the Pensions Authority, the Financial Services & Pensions Ombudsman or the Central Bank of Ireland.

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.

What are your rights around data?

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 Santiago Investment Advisors 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.

How long do we hold personal information for?

We retain personal information in line with regulations, currently 6 years following the cessation of a client relationship.

If you have a complaint

You have the right to complain to the Office of the Data Protection Commissioner at:

Office of the Data Protection Commissioner
Canal House
Station Road
Portarlinton
Co Laois
R32 AP23

Phone +353 (0761) 104 800

LoCall 1890 25 22 31

Email: info@dataprotection.ie

Website: <http://www.dataprotection.ie> (<https://www.dataprotection.ie>)

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 045 906480 or email data.privacy@santiagoinvestmentadvisors.ie.

Privacy policy statement changes

Santiago Investment Advisors 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.