



Privacy notice.

1. What is this notice about?

We are committed to protecting and respecting your privacy. The purpose of this notice is to outline how we manage your personal information in compliance with our legal obligations under the EU General Data Protection Regulation and Irish Data Protection Legislation.

This Privacy Notice tells you what we use your personal information for and explains your rights around how we use it. If you provide us with personal information about someone else, please make sure that you have their permission to do so. You should also make them aware of this notice, as it will apply to them.

2. Who we are?

When we talk about “Harvest” or “us” or “we” or “our” in this notice, we are talking about Harvest Trustees Limited (Harvest).

3. What personal information do we collect from you?

We collect and process different types of personal information. Dependant on your choice of product or service, the type of personal information and method of collection will vary. We need to be able to contact you, confirm your identity and gather your personal information to ensure we deliver the best possible customer experience when providing our products and services.

You may choose to give us your personal information through various mediums by accessing our website, by filling in forms and corresponding with us by phone, email or otherwise.

The personal information we may collect about you includes but is not limited to the following:

- identity and contact information e.g. name, signature, date of birth, proof of ID, proof of address, PPS number, nationality, gender, address, email address, phone numbers and residency; and
- financial information e.g. bank account details, income details, employment status, assets and liabilities.

You may decide you do not want to share your personal information with us but doing so may limit the products and services we are able to provide you. However, when we request personal information we will tell you if providing it is a contractual requirement or not, whether we need it to comply with our legal and regulatory obligations and the consequences of failing to provide such personal information.

4. How is your personal information used?

We need to collect and use personal information to provide you with our products and services. We will only collect, utilise and share your personal information in strict adherence with our legal obligations.

We use your personal information to:

- provide our products and services to you;
- identify ways in which we can improve our products and services;
- maintain and monitor our products and services;
- protect both our interests;
- comply with our legal and regulatory obligations;
- check against financial sanctions, PEP and adverse media hits e.g. crime and terrorism hits; and
- manage and respond to your complaints.



If, at any time, we need to use your personal information for a purpose that is different from the original purposes of collecting the personal information, we will contact you.

5. Who do we share your personal information with?

We only share your personal information with:

- your authorised representatives;
- third parties we need to share your personal information with to facilitate the provision of products and services on your behalf e.g. investment advisors, investment managers, life offices and guarantors;
- third party service providers with whom we have data processing agreements in place to protect your personal information e.g. Irish Life Group Services, IT service and cyber security providers and Harvest Financial Services Limited; and
- Legal and regulatory bodies e.g. the Revenue, An Garda Síochana, the Pensions Authority, the Financial Services and Pensions Ombudsman, etc.

In certain circumstances, we may be obliged to disclose personal information relating to you to third parties without notice to you to conform to a legal or regulatory requirement, to comply with a legal process, to carry out our duties or to assert, protect or defend our rights of property or your rights.

6. How do we keep your personal information safe?

Within Harvest your personal information will be transmitted and stored in a protected environment. We keep our computers, files and building secure. We take measures reasonably designed to protect your personal information from loss, misuse, unauthorised access, disclosure, alteration or unlawful destruction.

7. How long do we hold your personal information?

We do not hold your personal information for longer than is necessary. We hold your personal information while you are our customer and for a period after that relationship ceases, as permitted by law e.g. 6 years under the Statute of Limitations Act 1957.

8. What is our legal bases for using your personal information?

To use your personal information lawfully, we rely on one or more of the following legal bases:

- performance of a contract i.e. processing your personal information is necessary for us to provide you with our products and services;
- we must process your personal information to comply with our legal obligations under AML law, Pensions law, etc.;
- our legitimate interests i.e. the interests of Harvest in conducting and managing our business when providing products and services; and
- your consent (which you may withdraw at any time).

9. Why we may need your consent and how you can withdraw it?

Sometimes we need your consent to use your personal information. If we process your personal information based on consent, you have the right to withdraw that consent at any time by contacting us directly or by clicking on the “unsubscribe from this list” icon on communiqués.

10. Is your personal information transferred outside the European Union (EU)?

Your personal information is generally processed and stored within the European Union, in limited circumstances we do transfer personal information outside the EU. Some of our third-party service providers are global companies who may transfer data outside the EU for service support. This includes



our cyber security services, for example. Passing personal information to certain countries, including the UK and Canada is allowed under an Adequacy Decision made by the European Commission. Where we or our third-party service providers, transfer your personal information outside the EU, we will take steps to ensure that your personal information is adequately protected and transferred in line with data protection law.

11. Can Harvest makes change to this notice?

Yes, we may change this notice from time to time, in whole or in part, at our sole discretion or to fulfil a legal or regulatory obligation. We encourage you to check Harvest Financial Services Limited's website to view the most recent version of the notice.

12. What rights do I have?

You have the right to:

- request a copy of your personal information;
- request that we correct or update your personal information;
- request that we restrict our use of your personal information;
- object to our use of your personal information;
- request we transfer your personal information in digital form; and
- request we delete your personal information.

We generally do not charge you a fee when you request a copy of your personal information. However, if your request is deemed excessive or manifestly unfounded, we may choose to refuse your request or we may charge a reasonable fee to cover the additional administrative cost. We are obligated to act without undue delay, in most instances we will respond within one month of receipt your request. This period may be extended by a further two months, we will notify you of any extension and the reason for the delay within one month of the receipt of your request. Your right to obtain personal information can not adversely affect the rights and freedoms of others. Therefore, we can not provide personal information about other people without their consent.

13. Who can I make a complaint to?

The Director of Compliance and Risk is responsible for the investigation of complaints.

You also have the right to make a complaint to the Data Protection Commission. The most effective and efficient way to contact the Data Protection Commission regarding queries or complaints is by means of the webforms available on their website <https://forms.dataprotection.ie/contact>. Contact details for the Data Protection Commission are also available on their website <https://www.dataprotection.ie/en/contact/how-contact-us>

14. How to contact us?

If you have any complaints or questions about how your personal information is gathered, stored, shared or used, or if you wish to exercise any of your data rights, you may contact us at:

Director of Compliance and Risk
Harvest Trustees Limited
Block 3, The Oval
Shelbourne Road
Ballsbridge
Dublin 4
Do4 T8F2.

Tel: +353 (0)1 237 5500
E-mail: justask@harvesttrustees.ie



The legislative information contained herein is based on our understanding of current practice as at January 2024 and may be subject to change in the future.

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