

Data Privacy Notice

How we protect and manage your personal data

The General Data Protection Regulation (GDPR), came into force on 25 May 2018 and amends existing data protection law and places enhanced accountability and transparency obligations on organisations when using your information. The GDPR also gives you greater control over your personal information, including a right to object to the processing of your personal information where that processing is carried out for our business purposes.

This policy explains the most important aspects of how we use your information and what rights you have in relation to your personal information.

1. Who are we?

Throughout this document, “we”, “us”, “our” and “ours” refer to Twomey Moran & Partners Limited.

2. The data we collect about you

The type of data we collect will vary depending on the type of service that you require from us. Types of data we hold include:

- 2.1 data to identify you, including your contact information;
- 2.2 your financial details/financial circumstances;
- 2.3 your taxation details;
- 2.4 your marital status;
- 2.5 your financial associations;
- 2.6 information about you provided by others; and
- 2.7 information which you have consented to us using.

Sometimes we may use your information even though you are not our client. For example, you may be a beneficiary, guarantor, employee or relative of a client of ours. We also will hold data in relation to clients of other firms with whom our clients may be transacting.

3. When we collect your data

We collect information: (i) you give to us; and (ii) information provided to us by third parties.

4. How we use your data and the legal basis

We use, and share, your data where:

- 4.1 you have agreed or explicitly consented to the using of your data in a specific way (you may withdraw your consent at any time);

- 4.2 use is necessary in relation to providing you with a service (e.g. advising on transactions, filing tax returns or managing a Revenue audit)
- 4.3 use is necessary because we have to comply with a legal obligation (e.g. complying with our “know your client” obligations and reporting to regulatory authorities or law enforcement); and
- 4.4 use is necessary to protect your “vital interests” in exceptional circumstances.

5. Who we share your data with

When providing our services to you, and following your agreement/consent we may share your information with:

- 5.1 your authorised representatives;
- 5.2 third parties with whom: (i) we need to share your information to allow us to act on your behalf e.g. advisors representing the party with whom you are transacting, and (ii) you ask us to share your information;
- 5.3 financial institutions;
- 5.5 statutory and regulatory bodies including local government, the Revenue Commissioners, customs and excise officers and the Company Registration Office;
- 5.7 pension fund administrators, insurers/re-insurers; and
- 5.8 legal advisers.

6. How long do we hold your data

How long we hold your data for is subject to legislation and regulatory rules that we must follow in relation to the type of tax advice provided to you.

7. Implications of not providing your data

If you do not provide the information we request we may not be able to act on your behalf in an efficient and diligent manner.

We will tell you when we ask for information which is not a contractual requirement or is not needed to comply with our legal obligations.

8. Using companies to process your data outside the European Economic Area (EEA)

In some cases, and always with your agreement/consent we may transfer information about you and your products and services with us to our service providers and other organisations outside the EEA. We will always take steps to ensure that any transfer of information outside the EEA is carefully managed to protect your privacy rights.

9. How to exercise your data rights

In accordance with the GDPR which came into force on 25 May 2018, you have a number of rights in relation to how we process your information including the right to:

- 9.1 object to a particular use of your personal data for our legitimate business interests;
- 9.2 find out if we use your information, access your information and receive copies of your information;
- 9.3 in certain circumstances, to have your information deleted or our use of your data restricted;
- 9.4 have inaccurate/incomplete information corrected and updated;
- 9.5 exercise the right to data portability (i.e. obtain a transferable copy of your information we hold to transfer to another provider); and
- 9.6 withdraw consent at any time where processing is based on consent.

If you wish to exercise any of your data rights, you can contact our Data Protection Co-ordinator at 01 6607000

If we are unable to deal with your request fully within a calendar month we may extend this period by a further two calendar months and shall clearly communicate the reason why to you.

You also have the right to complain to the Data Protection Commissioner or any other supervisory authority. You can contact the office of the Data Protection Commissioner at:

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 Commissioner, Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois.

10. How to contact us

If you have questions about how we use your information, you can contact us on 01 6607000 or by email at info@twomeymoran.ie

11. Updates

We will update our Data Privacy Notice from time to time. Any updates will be made available and, where appropriate, notified to you by email, letter or on our website