



MERRION
STOCKBROKERS

DATA PROTECTION NOTICE

This notice sets out how Merrion Stockbrokers Limited will process personal information (as a Data Controller)

Merrion Stockbrokers Limited trading as Merrion Private and Merrion Fixed Income is a wholly owned subsidiary of Merrion Capital Holdings Limited. Merrion Stockbrokers Limited is registered in Ireland with the Companies Registration Office, registration number 307878. The registered office is Heritage House, 23 St. Stephen's Green, Dublin 2.

Merrion is authorised by the Central Bank of Ireland as an Investment Firm under Regulation 8(3) and deemed authorised under Regulation 5(2) of the Statutory Instrument No. 375/2017 European Union (Markets in Financial Instruments) Regulations 2017.

Where your details are provided to Merrion Stockbrokers Limited ("the **Firm**") as a consequence of your request for the Firm to provide investment services such as receiving and transmitting orders, executing orders, providing portfolio management services and/or investment advice (the "**Services**") to our customers ("you"), then the Firm, acting as a data controller may itself (or through a third party) process your personal information or that of your directors, officers, employees and/or beneficial owners. In connection with this, please note the following:

Purposes of Processing and Legal basis for processing

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 and/or where the processing is in the public interest.

Recipients of Data and International Transfer of Data

The Firm may disclose your personal information as follows:

- to its service providers, and other third party service providers engaged by the Firm in order to process the data for the above mentioned purposes;
- to competent authorities (including tax authorities), courts and bodies as required by law or as requested or to affiliates for internal investigations and reporting.

The disclosure of personal information to the third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (**EEA**) in accordance with the requirements of the General Data Protection Regulation. Such countries may not have the same data protection laws as your jurisdiction. The Firm may put

in place Standard Contractual Clauses with relevant parties to whom personal data will be transferred. Please contact DataProtection@merrion-capital.com for copies of the Standard Contractual Clauses that have been entered into on behalf of the Firm.

Security and safeguarding personal information

The Firm will maintain, and will require our service providers, and other third party service providers engaged by the Firm to maintain, appropriate physical, technical and organisational measures to protect Personal Data against accidental, unauthorised or unlawful destruction, loss, alteration, disclosure or access (“Data Breach”).

Retention period

The Firm will retain your personal information for as long as required for the Firm to perform the Services or perform investigations in relation to same depending on whether additional legal/regulatory obligations mandate that the Firm retains your personal information.

Data Subject Rights

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information.
- Right to rectify your personal information.
- Right to restrict the use of your personal information (in certain specific circumstances).
- Right to request that your personal information is erased (in certain specific circumstances).
- Right to object to processing of your personal information (in certain specific circumstances).
- Right to data portability (in certain specific circumstances).

Where the Firm requires your personal information to comply with AML or other legal requirements, failure to provide this information means the Firm may not be able to accept you as a client of the Firm.

You have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence or place of work or in the place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Firm or its service providers infringes the General Data Protection Regulation.

How to contact us

If you have any questions about our use of your personal information, please contact us at DataProtection@merrion-capital.com.