AUGUSTA ADVISORY

Data Privacy Notice

How Augusta Advisory Ltd collects, uses and protects your personal data

Effective: 29 September 2026 | Version 2.0

Our commitment to your privacy

Augusta Advisory Ltd respects your privacy and is committed to handling personal data lawfully, fairly and transparently. This notice explains what information we collect, why we use it, who we may share it with, how long we keep it and the rights available to you.

This notice applies to current, former and prospective clients and, where relevant, to other individuals whose personal data is provided to us in connection with a client relationship. If you provide us with another person's personal data, please make them aware of this notice where appropriate.

1. Who is responsible for your personal data?

Augusta Advisory Ltd is the data controller for personal data that it determines how and why to process in connection with its financial advisory services.

Controller	Augusta Advisory Ltd
Address	Abhai-lea, Lea, Portarlington, Co. Laois, R32 N2W7
Website	www.augustaadvisory.ie
Telephone	+353 87 975 5845
Regulatory status	Regulated by the Central Bank of Ireland (C573139)

Questions about this notice or requests to exercise your data protection rights can be sent to Augusta Advisory Ltd at the address above, marked for the attention of the person responsible for data protection matters.

2. Personal data we may collect

The information we need depends on the service you ask us to provide. If required information is not provided, we may be unable to give advice, arrange a product or continue to provide a service.

- Identity and contact details - name, address and proof of address, date and place of birth, nationality, telephone number, email address and other contact details.
- Personal and family details - marital status, dependants, family relationships and other information relevant to your financial planning.
- Employment and financial information - employer, occupation, employment history, income, expenditure, assets, liabilities, loans, debts, pensions, investments, protection arrangements and other financial circumstances.
- Identification and tax information - PPS number, passport or other identification details, tax identification information and documentation required for customer due diligence.
- Product and policy information - quotations, applications, policies, investments, pensions, claims and information about products you hold or have considered.
- Communications and service records - correspondence, meeting notes, instructions, complaints, preferences and records created in the course of providing our services.
- Website and enquiry information - information you submit through our website or when requesting that we contact you.

Special categories of personal data

Some financial protection or insurance applications may involve health information. Health data receives additional protection under data protection law. Where Augusta processes special category data, we will do so only where a valid condition under Article 9 GDPR applies. Life insurers may separately collect and control additional medical information for underwriting; their own privacy information will apply to that processing.

3. Where we obtain personal data

We primarily collect information directly from you. Depending on your circumstances and the service involved, we may also obtain personal data from:

- your employer, representative or authorised adviser;
- product providers, life assurance companies, pension providers, trustees, investment firms or stockbrokers;
- other providers with whom you hold a policy or investment, where you have authorised us to obtain information;
- businesses or professional advisers that introduce or refer you to us;
- publicly available or regulatory sources where appropriate for legal, compliance or verification purposes; and
- our website or other channels through which you make an enquiry.

Where personal data is obtained from a source other than you, we will provide the information required by Article 14 GDPR within the applicable timeframe, unless an exemption applies or you already have the information.

4. Why we use your personal data and our lawful bases

We use personal data only where we have a lawful basis. Depending on the processing activity, this may include:

Lawful basis	How it may apply
Contract / pre-contract steps	To assess your needs, provide advice or quotations, arrange products, administer our relationship and act on your instructions.
Legal obligation	To meet regulatory, anti-money laundering, sanctions, tax, record-keeping, complaints-handling and other legal obligations.
Legitimate interests	To manage and improve our business and services, maintain appropriate records, protect our systems and legal rights, prevent fraud, and communicate with you where those interests are not overridden by your rights and freedoms.
Consent	Where consent is the appropriate basis, including certain uses of special category data or direct electronic marketing. You may withdraw consent at any time, without affecting processing already carried out lawfully.
Public interest / legal functions	Where processing is necessary in connection with a lawful public-interest function or cooperation with a competent authority, where applicable.

Where providing particular personal data is a statutory or contractual requirement, or is necessary to enter into a contract, we will explain this where relevant. Failure to provide required information may mean that we cannot provide the requested service or arrange a product.

5. Purposes for which we process personal data

- to understand your circumstances, objectives, needs and preferences and provide financial planning and advice;
- to obtain quotations, make recommendations and arrange or service life assurance, pension and investment products;
- to communicate with you and respond to requests, instructions, claims or complaints;
- to verify identity and source of funds or wealth where required and comply with anti-money laundering, sanctions and other legal or regulatory obligations;

- to maintain business, compliance and audit records and cooperate with regulators, authorities and professional advisers;
- to manage our systems, service providers, business continuity, security and quality controls;
- to establish, exercise or defend legal claims; and
- to send marketing communications where permitted by law and in accordance with your preferences.

6. Who we may share personal data with

We share personal data only where necessary for the purposes described in this notice or where required by law. Recipients may include:

- life assurance companies, pension providers, trustees, investment firms, stockbrokers and other product providers with whom we place or service business;
- beneficiaries, trustees, assignees, relatives, guardians or personal representatives where relevant to a policy, pension, claim or legal entitlement;
- employers where relevant to workplace or occupational pension arrangements;
- legal, financial, compliance, audit, IT, CRM, printing, postal and other professional or support service providers acting under appropriate obligations;
- regulators and public bodies, including the Central Bank of Ireland, the Pensions Authority, the Revenue Commissioners, An Garda Síochána and the Data Protection Commission, where legally permitted or required; and
- the Financial Services and Pensions Ombudsman where relevant to a complaint.

Some product providers and professional service providers will act as independent data controllers and will provide their own privacy information. Others may process personal data on our behalf under contractual data protection obligations.

7. International transfers

Our intention is to use service providers and systems that protect personal data in accordance with applicable data protection law. If personal data is transferred outside the European Economic Area, we will ensure that an appropriate transfer mechanism or safeguard is in place where required, such as an adequacy decision or approved contractual safeguards. You may contact us for information about the safeguards relevant to your data.

8. How long we keep personal data

We retain personal data only for as long as necessary for the purposes for which it was collected and to meet legal, regulatory, accounting, complaints and reporting requirements. Financial services records are generally retained for at least six years after the end of the relevant relationship or transaction where required by applicable regulatory rules. Some records may need to be retained for longer where another legal obligation applies, a complaint or legal claim is ongoing or a longer period is otherwise justified. When data is no longer required, it will be securely deleted or anonymised as appropriate.

9. Your data protection rights

Subject to the GDPR, the Data Protection Act 2018 and any applicable restrictions or exemptions, you may have the following rights:

- Access - to obtain confirmation of whether we process your personal data and a copy of it.
- Rectification - to have inaccurate or incomplete personal data corrected.
- Erasure - to request deletion of personal data in certain circumstances.
- Restriction - to request that processing be restricted in certain circumstances.
- Data portability - to receive certain personal data in a structured, commonly used and machine-readable format and, where applicable, have it transmitted to another controller.
- Objection - to object to processing based on legitimate interests or a task in the public interest, and to object at any time to processing for direct marketing.

- Withdraw consent - where processing is based on consent, to withdraw it at any time without affecting the lawfulness of earlier processing.
- Automated decisions - where applicable, rights relating to decisions based solely on automated processing that produce legal or similarly significant effects.
- Complaint - to lodge a complaint with the Data Protection Commission.

These rights are not absolute and may be subject to legal conditions or exemptions. We may need to verify your identity before acting on a rights request.

10. Automated decision-making and profiling

We may use systems or tools to assist with quotations, analysis, client segmentation or service administration. We do not intend to make decisions about you based solely on automated processing where the decision would produce legal or similarly significant effects unless permitted by law. If such processing applies, we will provide the additional information required by the GDPR, including meaningful information about the logic involved and the significance and expected consequences, together with any applicable right to obtain human intervention and contest the decision.

11. Direct marketing

We may contact you about products or services where we have a lawful basis to do so. Electronic direct marketing is subject to the ePrivacy Regulations as well as the GDPR. Where consent is required, we will seek a clear affirmative opt-in. Where the limited existing-customer exception applies, we will meet the conditions attached to that exception. You may object to direct marketing at any time, and each electronic marketing communication will provide an appropriate means to opt out.

Your marketing choice

Withdrawing marketing consent or objecting to direct marketing will not affect service communications that we need to send in connection with your existing products, instructions, legal obligations or our contractual relationship with you.

12. Keeping your information secure

We use appropriate organisational and technical measures designed to protect personal data against unauthorised access, loss, alteration, disclosure or destruction. Access is limited to those who need the information for legitimate business purposes, and service providers are required to protect personal data in accordance with applicable law and contractual obligations.

13. Complaints and contacting the Data Protection Commission

If you have a concern about how Augusta Advisory Ltd handles your personal data, please contact us first using the details in section 1 so that we can investigate and respond.

You also have the right to lodge a complaint with the Data Protection Commission (DPC). The DPC's current postal address is: Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963, Ireland. Further contact and complaint information is available at www.dataprotection.ie.

14. Changes to this notice

We will review this notice periodically and update it where our processing activities, legal obligations or regulatory requirements change. The current version and effective date will be shown on the notice. Where a change is material, we will take reasonable steps to bring it to your attention where appropriate.

Regulatory framework

This notice is intended to reflect the transparency requirements of Articles 12, 13 and 14 of the EU General Data Protection Regulation (GDPR), the Data Protection Act 2018 and, for electronic direct marketing, the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011, as amended.

Augusta Advisory Ltd | Company No. 801292 | Central Bank Ref. C573139
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