



PRIVACY NOTICE

APEX IFS LIMITED
APEX TSI LIMITED

1 Who are Apex?

Apex is a trading name of Apex IFS Limited and Apex TSI Limited which are part of Apex and principally offer corporate and administration services. Please refer to the “Legal and Regulatory Status” page on the Apex website (<https://apexfundservices.com/regulatory-status/>) for more details on the trading companies in the Apex Group. All of the companies are wholly owned subsidiaries of Apex Group Limited (“Apex”). For more information on Apex, please visit <https://apexfundservices.com/>

2 What is this Privacy Notice?

At Apex we collect personal information about you and are committed to protecting this information and your privacy. Set out below is an explanation of how we use, collect and safeguard your personal information. This Privacy Notice applies where any company within Apex receives personal data in connection with any services that we are engaged to provide to you or any company of which you are a member or director (“Services”).

3 What personal information do we collect and why do we collect your information?

We may collect information about you where this is required in connection with our Services, including your contact information and (where applicable) your consent to act as a director.

We are required by law to obtain “know your client” information as detailed in our terms of engagement for our Services, and this includes certain personal information including information contained in a formal identification document or social security or other unique reference relating to you.

We may receive information about you from a third party source in connection with our Services. For example, we may carry out electronic verification checks or screening and/or may receive information about you from a public source or a third party in order to verify your identity or check whether you are a politically exposed person, or subject to any financial sanction or as may otherwise be required by law or regulation.

We may use your information to communicate or correspond with you. We may keep a record of any correspondence you have with us, including certain telephone calls which we may be legally required to record (but we will inform you at the beginning of the telephone conversation if recording will be necessary).

4 How do we use your personal information?

We will use the information we hold about you for the following purposes:

In connection with a CONTRACT for services with you

We will use and process your personal information where we require this in connection with our Services (or where you are in discussions with us about any new service). We will use this information in connection

with our contract with you for the supply of those Services, (or when it is needed to enter into the contract); and so that we can communicate with you in relation to those Services (including notifying you of any changes to our Services).

Where it is necessary to comply with a LEGAL OBLIGATION

We may use, store and share your information where we are under a legal obligation to do so. This may include use of your information:

- to verify your identity (including electronic checks or screening);
- in connection with any legal obligation on us to report any fraud or other criminal activity (including money laundering or tax avoidance schemes).

In connection with this we may collect information in the public domain relating to any criminal activity or allegation of criminal activity. We may use this information in the substantial public interest in the detection or prevention of unlawful acts or in protecting the public against dishonesty, or for on suspicion of terrorist financing and money laundering. Any information of this type will be subject to appropriate safeguards to with regards to security and to ensure your rights as a data subject are protected.

Where we have a LEGITIMATE INTEREST

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business for the following purposes.

- for the detection and prevention of fraud and other criminal activities;
- to verify the accuracy of data that we hold about you and create a better understanding of you as a client;
- network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- to comply with a request from you in connection with the exercise of your rights;
- assess and improve our service to customers through recordings of any calls; and
- management of queries, complaints, or claims.

5 Who we share personal information with?

We will only disclose your personal information in accordance with applicable laws and regulations. We will disclose your information to the following third parties:

- any person with legal or regulatory power over us (such as the Department of Justice and Equality, An Garda Síochána, Office of the Revenue Commissioners) that may require disclosure on legal grounds;
- service providers engaged by us to help us run our business and perform the Services. Such service providers may include, for example, cloud or archive storage providers (engaged by us to provide

electronic or physical storage facilities for our business data and your information), or providers of software or other IT resources;

- any member of the Apex Group which means our subsidiaries, our ultimate holding company and its subsidiaries (from time to time) as necessary to perform any Services to you.

Some of these third parties (including Apex Group subsidiaries and service providers) may be outside of the European Economic Area (EEA). We will ensure that any such subsidiary or service provider has put in place adequate safeguards to ensure that your information is held securely and in accordance with this Privacy Notice. Such steps will include placing the party we are transferring personal information to under contractual obligations to protect it to adequate standards. Transfers within the Apex Group will be covered by an agreement entered into by members of the Apex Group (an intra-group agreement) which contractually obliges each member to ensure that your Personal Data receives an adequate and consistent level of protection wherever it is transferred within the Group.

6 How we keep your information secure?

We store the information you provide about yourself in a secure database and take appropriate security measures to protect such information from unauthorised access.

We take protection of your personal information and our system security very seriously. Any personal information which is collected, recorded or used in any way will have appropriate safeguards applied in line with our data protection obligations.

We implement Internal and external audits and regular, independent assurance exercises across our business to ascertain the effectiveness of our security control environment and our security strategy.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect your personal and confidential information whenever they are processing it and must undertake annual training on this.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

All exchanges of information between you and our website go through encrypted channels in order to prevent interception of your information. Public access to your information via and our website / the portal / any web-hosted platform is protected by a login using your user ID and password. You should ensure that these are kept secret and not divulged to other people. You recognise that your use of our website is entirely at your own risk. Apex websites operate on the internet, which is inherently insecure, Apex cannot guarantee the information you supply will not be intercepted while being transmitted over the internet. Accordingly, Apex has no responsibility or liability for the security of personal information transmitted by you via our website.

7 How long we will store your information for?

We generally hold your personal data on our systems for as long is necessary to provide our Services and for regulatory compliance. This is ordinarily 6 years from the date you cease to use the Services or the termination of our Agreement in connection with legal or regulatory proceedings.

We must keep "Know your Client" information for 5 years after completion of our Services. We may be required to keep certain information about your appointment as a director of any company to whom we provide Services and will keep such records for as long as we are required to do so by law.

If we anonymise your personal information so that it can no longer be associated with you, it will no longer be considered personal information, and we can use it without further notice to you.

8 Your rights

You have the following rights in relation to how we use your information. If you'd like to exercise these rights please contact us using the contact details listed at section 11 "Who can you speak to at Apex about this Privacy Policy?"

Right to lodge a complaint - You have a right to complain to the ICO at any time if you object to the way in which we use your personal information. More information can be found on the Data Protection Commission website: <https://www.dataprotection.ie/>

Right of access - you have the right to know if we are using your information and, if so, the right to access it and information about how we are using it. There will not usually be a charge for dealing with these requests. Your personal information will usually be provided to you in writing, unless otherwise requested. Where you have made the request by electronic means the information will be provided to you by electronic means where possible.

Right of rectification - We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case you have the right to require us to rectify any errors in the information we hold about you.

Right to erasure - you have the right to require us to delete your information if our continued use is not justified. However, this will need to be balanced against other factors, depending upon the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.

Right to restrict processing - in some circumstances, although you may not be entitled to require us to erase your information, but may be entitled to limit the purposes for which we can use your information.

Right of data portability - you have the right to require us to provide you with a copy of the personal information that you have supplied to us in a commonly used machine-readable format or to transfer your information directly to another controller (e.g. a third party offering services competing with ours). Once transferred, the other party will be responsible for looking after your personal information.

Right to object to direct marketing - You can ask us to stop sending you marketing messages at any time. Please see below.

Right not to be subject to automated-decision making - Apex do not make decisions about you using automated decision making or profiling of your personal data.

Right to withdraw consent - For certain limited uses of your personal information, we may ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal

information. If you withdraw your consent, we may not be able to provide certain products and services to you. If this is the case, we'll tell you at the time you ask to withdraw your consent.

In some circumstances exercising some of these rights will mean we are unable to continue providing you with your investment or maintaining a business relationship with you.

You can make any of the requests set out above using the contact details in this Privacy Notice. Please note that in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. We will always respond to any request you make and if we can't comply with your request, we will tell you why.

9 Marketing

We respect your privacy and ensure we carry out our direct marketing activities in accordance with applicable laws and guidance.

We may contact you with marketing information by post or by telephone or with targeted advertising delivered online through social media and platforms operated by other companies, unless and until you object. We may also contact you with marketing information by email or other electronic means unless and until you object.

Where we have obtained your email address in connection with our contract with you for any Services, or where you have made a positive enquiry about any of our services, we may also contact you with marketing information about similar services by email or other electronic means unless and until you object

We will only share your data with our recommended third party partners for them to contact you with marketing information about their products and services where you have indicated that you would like us to do so. Please use the link on the page requesting your consent to find out more about these third parties. Once shared, the relevant third party's privacy policy will apply to their processing of your personal information, not ours. If you'd like to opt-out of receiving marketing from a third party after providing your consent, you can do so at any time by contacting the relevant third party directly.

If you wish to unsubscribe from any emails sent by us, you may do so at any time by following the unsubscribe instructions that appear in the email. Otherwise you can always contact us using the details set out in this Privacy Notice to update your contact preferences. In such circumstances, we will continue to send you service related (non-marketing) communications where necessary.

10 Following links from our websites

Our website may contain links to other sites. Such other sites may also make use of their own cookies and will have their own privacy policies. You should carefully review the privacy policies and practices of other sites, as we cannot control or be responsible for their privacy practices. We do not accept any liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

11 Changes to this Privacy Notice

Please note that this policy will be reviewed and may be changed from time to time so please check the page on our website at <https://www.linkassetsservices.com/privacy-policy> occasionally to ensure that you're happy with any changes. This policy was last updated in March 2019.

12 Who can you speak to at Apex about this Privacy Notice?

Questions, comments and the exercise of your rights regarding this Privacy Policy and your information are welcomed and should be addressed to the Head of Compliance by email at privacy@linkgroup.ie or by post at Apex IFS Limited, Block C, Maynooth Business Campus, Maynooth, Co. Kildare, W23 F854. If you wish to make a complaint on how we have handled your personal information, you can contact our Compliance team at privacy@linkgroup.ie

If you wish to make a complaint on how we have handled your personal information, you can contact our Data Protection Officer. If you are not satisfied with our response or believe we are processing your personal information not in accordance with the law you can complain to the supervisory authority in Ireland responsible for the implementation and enforcement data protection law: the Data Protection Commission ("DPC"). You have the right to complain to the DPC about our collection and use of your information. You can contact the DPC via its website www.dataprotection.ie or Call 1890 25 22 31.