



Data Privacy Policy

Introduction

At CHM Capital Funding, we are committed to protecting the privacy and confidentiality of personal information entrusted to us by our clients, employees, and other stakeholders. This Data Privacy Policy outlines how we collect, use, store, and protect personal data in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR).

Scope

This policy applies to all personal data processed by CHM Capital Funding, in the course of our advisory services, employee management, and other business operations.

Principles

1. **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and transparently. We inform individuals about the purposes of data processing and obtain their consent where required. The purpose of processing your information is to comply with legal and regulatory requirements including Anti-Money Laundering and Sanctions compliance.
2. **Purpose Limitation:** We collect and process personal data only for specified, explicit, and legitimate purposes. We do not use data for purposes incompatible with the original purpose.
3. **Data Minimisation:** We collect and retain only the minimum necessary personal data required for our business operations.
4. **Accuracy:** We strive to keep personal data accurate, complete, and up-to-date. Individuals have the right to request corrections.
5. **Storage Limitation:** We retain personal data only for as long as necessary to fulfill the purposes for which it was collected. As a general rule for legal and best practice reasons we are required to keep your information for 6 years after the date on which our relationship with you ends.
6. **Security and Confidentiality:** We implement appropriate technical and organizational measures to protect personal data from unauthorized access, loss, or disclosure.

Data Collection and Use

We will only use your Personal Data for lawful reasons. These are: -

1. **Clients:** We collect and process client information necessary for providing our services. This includes:
 - Contact Details, Financial data, and other relevant information.
 - You have consented to us using your information in such a way
 - The use is necessary to comply with our legal obligations.
 - The use is necessary for the purpose of our legitimate interests.
 - The use is necessary for the performance of a task carried out in the public interest, such as assisting a regulatory authority's investigation of a criminal offence.
2. **Employees:** We collect employee data for employment purposes, including payroll, benefits, and performance management.
3. **Marketing:** We may use contact information to send marketing communications related to our services. The purpose of processing your information is to carry out and determine the effectiveness of advertising and of marketing campaigns. Individuals can opt out at any time.

Data Subject Rights

Individuals have the following rights:

- **Access:** Request access to their personal data. You have the right to access a copy of your Personal Data which we hold on you. In the case of Personal Data, you provided to us to process on the basis of

your consent or for automated processing, you have the right to have it provided in a commonly used electronic format to you or to another Data Controller (subject to applicable Data Protection Law). If you would like a copy of your Personal Data, please contact us. Your request will be dealt with as quickly as possible and in any event within a month for us to respond.

If at that stage we are unable to provide the data you require (due to the complexity or number of requests) we may extend the period to provide the data by a further two months but shall explain the reason why. There is no charge for the request for your data, but it must be in writing, fax, email or text message.

- **Rectification:** You have the right to have your Personal Data corrected if you feel we have incorrect data held on you.
- **Deleting Your Personal Data:** Subject to any overriding legal obligation requiring us to retain it, you have the right to have your Personal Data deleted, however erasing your information may make it difficult or impossible for us to give you information on, provide you with, or administer our financial products. If you want your information deleted, please contact us.
- **Your Right to Object and Withdraw your Consent to Data Processing:** - Where our lawful basis for processing your Personal Data is based on our legitimate interests, you have the right to object. You also have the right to withdraw your consent to any processing at any time. However, if we cannot process your data, it may make it difficult, impossible or unlawful for us to give you information on, provide you with, advice on financial products. If you want to object or withdraw your Consent to processing, please contact us
- **Restricting our use of your Personal Data:** You have the right to restrict our use of your Personal Data in certain circumstances. If you wish to exercise your rights in this regard, please contact us.

Data Breach Notification

In the event of a data breach, we will promptly notify affected individuals and the Data Protection Commission.

Your Right to make a Complaint

If you are dissatisfied about the way we handle your Personal Data, please contact us. We will do our best to address your concerns swiftly and resolve any issues you have. You have the right to complain to the Office of The Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois. R32 AP23.

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