



Innocap Global Investment Management (Ireland) Ltd
Website Privacy Notice

1. Who we are:

We are Innocap Global Investment Management (Ireland) Ltd of Embassy House, Herbert Park Lane, Ballsbridge, Dublin 4, Ireland. You can contact us at this address by post or by email at Terence.Tinnelly@innocap.com.

Our data protection representative is Terence Tinnelly (Terence.Tinnelly@innocap.com).

2. Why we process your data, the lawful basis for processing your data and retention

For current and potential clients, we process data to create and provide you with access to the content of our website

The legal basis for this processing is our legitimate interest in the administration and operation of our services.

We will retain this data in accordance with our Retention of Records Policy and to the extent permitted by law. Retention period will vary depending on the purpose for which we are using your data and applicable laws and regulations.

3. Transfers of data outside the European Economic Area

We transfer data relating our activities to our parent company, Innocap Investment Management Inc., located in Canada. Data is transferred as part of its provision of services including management of accesses to our website. The safeguard we have put in place for this transfer is the inclusion of confidentiality clauses in the agreement with our parent company.

4. Your rights relating to personal data

You have the following rights under the General Data Protection Regulation, in certain circumstances and subject to certain exemptions, in relation to your personal data:

- right to access the data - you have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.
- right to rectification - you have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- right to erasure - you have the right to request us to delete personal data that we hold

about you. This is sometimes referred to as the right to be forgotten.

- right to restriction of processing or to object to processing - you have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- right to data portability - you have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine readable format.

In order to exercise any of the rights set out above, please contact us at the contact details at the start of this privacy notice.

If we are processing personal data based on your consent, you may withdraw that consent at any time. This does not affect the lawfulness of processing which took place prior to its withdrawal.

If you are unhappy with how we process personal data, we ask you to contact us so that we can rectify the situation.

You may lodge a complaint with a supervisory authority. The Irish supervisory authority is the Data Protection Commission.

5. Requirement to process personal data

You may browse our website without providing us with any personal data and this will not affect your ability to view our website.

However, if you do not provide us with your information for the purposes described above, we cannot provide you with access to the portal.

6. Automated decision-making and profiling

We do not use any personal data for the purpose of automated decision-making or profiling.