

PIVOTAL CORPORATE PRIVACY NOTICE

WHO ARE WE *(Throughout this document we, us, our and ours refer to the below)*

- Pivotal Corporate & Trust Solutions Limited t/a Pivotal Corporate;
- Pivotal Corporate Secretaries Limited; and
- Pivotal Corporate AMS Limited (together referred to as “Pivotal”).

We provide corporate services including company secretarial, project management and accounting services to our Clients and are registered as a corporate service provider (“CSP”) with the supervision of the Institute of Chartered Accountants in Ireland. As a CSP, we are also subject to the EU General Data Protection Regulation 2016/679 (“GDPR”) as well as local data protection laws implemented by the Irish government.

In the carrying out of services as outlined in a written agreement with a Client, Pivotal is generally considered a data processor relating to the personal data of any such directors, officers, duly appointed attorneys or legal representatives, authorised signatories, employees, customers, shareholders, ultimate beneficial owners, or personnel connected with professional advisers or service providers affiliated with the Client, with the Client being considered the data controller in this instance. On some occasions however, Pivotal will be considered the data controller such as interactions with Clients, the gathering of anti-money laundering information, maintaining internal databases, etc.

WHERE ARE WE *(Where is the location of data processing.)*

Personal Data is processed by Pivotal Corporate:

- At our registered office located at 45 O’Connell Street, Limerick; and/or
- At other locations where staff are located from time to time.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We collect some or all of the following information about you when you engage us to deliver our services or interact with us professionally:

- Identity and Contact Information such as but not limited to: name, address both residential and business, telephone number, e-mail address (or other contact details), date of birth, job title, education and professional history (where provided on CV), employer details, tax residency, proof of identity, PPS number (or equivalent), ID documentation and proof of address.
- Recruitment Information such as but not limited to work experience, education history, references, personal skills and any other information provided to us by potential candidates during the recruitment process.
- Employee Related Information such as but not limited to position, attendance information (including absence, holiday and other leave records), salary details, tax details, benefits and pension scheme data, performance information, appraisals and

other managerial performance information, training records, basic health information.

- Payment Information such as but not limited to personal data which is necessary to process payments under contracts of employment or any other contracts requiring payment.
- Miscellaneous Information such as but not limited to data which we are required to collect in order to comply with applicable anti-money laundering/counter-terrorist financing laws and regulations.

HOW DO WE COLLECT INFORMATION ABOUT YOU?

We collect your information in a number of ways, such as but not limited to:

- From information that is publicly available such as the internet, the Companies Registration Office, the RBO platform, the various stock exchanges and other public sources.
- From information received when you communicate with us directly via telephone, email, teleconference and any other forms of communication used.
- From information provided in the course of proposing for potential services with a new Client, intermediary or similar, examples of which are deal information, proposed structure charts, legal opinions or anti-money laundering information.
- From information received directly from Clients or those acting on behalf of Clients such as intermediaries and advisors.

We also collect information when you give us your business card, enquire about our services, network with us at events, engage us for our services, register for our events. We may use this information to communicate with you about our firm, invite you to events and market our services to you. If you would like to opt out of receiving marketing information about us, you can do so at any time by writing to us or emailing us at the details below.

HOW WILL WE USE THE INFORMATION WE COLLECT ABOUT YOU?

We process information for a variety of reasons:

- The fulfilment of services outlined in written contracts with Clients.
- To invite Clients and contacts to events.
- Other day-to-day administration purposes that would be in our legitimate business interests.
- To provide proposals to Clients at their request.
- In accordance with Anti-Money Laundering Legislation.
- Filling of employment vacancies.
- In accordance with our compliance obligations to the Chartered Accountants of Ireland. We may also engage third party compliance firms to perform compliance reviews.
- In accordance with the Return to Work Safely Protocol issued by the Government during the COVID-19 pandemic, to facilitate contact tracing.

If we are in receipt of a valid request from Irish and European law enforcement authorities, we would make data available to them in accordance with our legal obligations.

We will use your information about you to provide the services you have requested from us and, if you agree, to contact you about other products and services we think may be of interest to you. We are able to use your information because we have a contractual obligation to you or because you have consented to the use of your information in certain ways.

We have no intent in sharing your personal data with other services, other than for the purposes of those listed above, without your permission.

YOUR RIGHTS

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the address below. We may have to apply an appropriate charge for this service depending on the circumstances.

You may be asked for additional information to verify your identity as part of processing the request to exercise your rights. We will endeavour to respond to all requests within 30 days of receiving the initial request. If we are unable to complete the request within the 30-day limit, we will notify you within the required time limit.

We want to make sure that your personal information is accurate and up to date. You have the right to ask us to correct or remove information you think is inaccurate.

You also have other rights, including: the right to erasure, right to restrict processing of your information; the right to data portability; and the right to object to certain uses of your information.

We do not carry out any automated decision making or profiling activities, so the rights in relation to automated decision making and profiling would not apply.

You can learn more about your rights at: <https://www.dataprotection.ie/>.

SECURITY

We use a variety of security technologies and procedures to protect the security of your personal data from loss, misuse, alteration, disclosure or destruction. In particular, we ensure that all appropriate confidentiality obligations and technical and organisational security measures are in place to prevent any unauthorised or unlawful disclosure or processing of such information and data and the accidental loss or destruction of or damage to such information and data.

DATA RETENTION

We retain personal data only for the length of time necessary to provide services to customers, engage in consented to marketing activities, as required by law, and other legitimate purposes of our business.

WEBSITE

Our website may use Google Analytics Tracking and WordPress cookies.

Cookies

A cookie is a small text file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. The use of cookies is now standard operating procedure for most websites. However, if you are uncomfortable with the use of cookies, most browsers now permit users to opt-out of receiving them. In that case, you may find some functionality on our website impaired. After termination of your visit to our site, you can always delete the cookie from your system. You can find information on how to use browser settings to stop unwanted cookies in [Chrome](#), [Firefox](#), [Opera](#), [Safari](#) and [Internet Explorer](#). For other browsers, please consult the help menu for that product.

Analytics

We may use Google Analytics on our website. Google Analytics writes cookies to your device (detailed above).

Google Analytics necessitates the transfer of some data to servers in the United States. Google Analytics' terms of service, which all Google Analytics customers must adhere to, prohibit sending personally identifiable information (PII) to Google Analytics. PII includes any data that can be used by Google to reasonably identify an individual, including (but not limited to) names, email addresses, or billing information. The Google Analytics Privacy Policy is available here <https://policies.google.com/privacy?hl=en>.

OTHER PURPOSES

Other purposes for which we might process personal data can include:

Legal Action

Where necessary we will process personal data provided to us for the purposes of seeking legal advice or other legal purposes. Examples of such processing would include providing information to debt collection agencies in the event of persistent non-payment for products or services.

Also, where we receive a formal request under Section 8 of the Data Protection Acts 1988 and 2003 or Article 23 of the General Data Protection Regulation (GDPR) we may be required to disclose personal data of website users, business contacts and/or Clients to An Garda Síochána, the Revenue Commissioners, or other relevant organisations.

Cross-Border Data Transfer

We may transfer certain personal data outside of the EEA to companies working with us or on our behalf for the purposes described in this Privacy Statement.

Should this occur, your personal data will continue to be protected by means of contracts we will have in place with those organisations outside the EEA, containing standard data protection clauses which are in a form approved by the European Commission.

HOW TO CONTACT US

Should you need to contact the Privacy Officer for Pivotal Corporate, you may do so in writing at either our postal or email address below:

Pivotal Corporate & Trust Solutions Ltd, 45 O'Connell Street, Limerick
info@pivotalcorporate.com

UPDATES OR QUESTIONS

This privacy policy will be reviewed and updated from time to time. It would also be reviewed each time we add functionality to our website.

This privacy notice was last updated on 3rd February 2022.