



CURVE

CONSULTING

Privacy Notice.

Last updated: 24th September 2018.

Privacy Summary

Curve Consulting is committed to protecting your personal information by processing it responsibly and safeguarding it using appropriate technical, administrative and physical security measures.

The privacy notice below explains what information we gather about you, what we use that information for and to whom we give the information. It also sets out your rights and who you can contact for more information or queries.

Information about you which we process:

We may collect or obtain information about you that you provide to us, that we obtain from third parties or that is publicly available. This information about you may include your name, age, gender, date of birth and contact information. It may also include so called 'sensitive' or 'special categories' of personal data, such as dietary requirements or mobility information. For a more detailed description of the information about you that we may process, please see paragraph 2 below.

How we use information about you:

We collect and process information about you and/or your business to enable us to provide our services to you, to enable us to provide you with information that we think may be of interest to you and in order to meet our legal or regulatory obligations. For a more detailed description of how we use information about you, please see paragraph 4 below.

Where we provide you with information that we think may be of interest to you, you have the right to unsubscribe at any time by following the unsubscribe instructions in our communication or contacting us in the way set out in paragraph 13.1 below.

Sharing and transferring your information:

We may disclose information about you to other firms to some third parties. For more information please see paragraph 7 below.

We may transfer some information about you to countries outside the European Economic Area ("EEA"). These countries may have differing and less stringent data protection laws. When we transfer information about you outside the EEA, we will put in place appropriate safeguards to ensure that your information remains adequately protected. For more information see paragraph 8 below.

Your rights:

Under data protection laws you have a number of rights, including the right to: 1) request copies of your data, 2) request rectification of your data, 3) request erasure of your data, 4) object to us processing your data, and 5) request us to restrict the processing. For more information about your privacy rights please see paragraph 11 below.

Contact points:

If you have any questions or comments about privacy issues or wish to exercise any of the rights set out above please write to Data Officer, Curve Consulting, Bloomfield Avenue, Donnybrook, Dublin 4 or email privacy@curve.ie

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PRIVACY NOTICE

In this notice:

"Data Protection Legislation" means the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection.

1 Who this privacy notice applies to and what it covers

1.1 This privacy notice applies to Curve Consulting and the entities we own or control ("Curve", "we", "us" or "our") with offices at:

- Bloomfield Avenue, Donnybrook, Dublin 4, Republic of Ireland;

1.2 We are committed to protecting your personal data and processing your information in an open and transparent manner.

1.3 This privacy notice sets out how we will collect, process, store and protect information about you when:

1.3.1 providing services to you or our clients;

1.3.2 you use "our Website"; or

1.3.3 performing any other activities that form part of the operation of our business.

1.4 When we refer to "our Website" or "this Website" in this policy we mean the specific webpages of curve.ie.

1.5 This privacy notice also contains information about when we share your personal data with other third parties (for example, our service providers).

1.6 In this privacy notice, your information is sometimes called "personal data". We may also sometimes collectively refer to processing, collecting, protecting and storing your personal data as "processing" such personal data.

2 What information we collect

2.1 We may collect, record and use information about you and our client in physical and electronic form and will hold, use and otherwise process the data in accordance with the Data Protection Legislation and as set out in this notice.

2.2 In the course of providing services to you or our client and performing due diligence checks in connection with our services (or communicating with you regarding possible services we might provide), we may collect or obtain personal data about you. We may also collect personal data from you when you use this Website.

2.3 We may collect or obtain such data because you give it to us (for example in a form on our Website), because other people give that data to us (for example your employer or adviser, or third party service providers that we use to help operate our business) or because it is publicly available. The legal grounds for processing your data are set out in paragraph 6 below.

2.4 We may also collect or obtain personal data from you because we observe or infer that data about you from the way you interact with us or others. For example, to improve your experience when you use this Website and ensure that it is functioning effectively, we (or our service providers) may use cookies (small text files stored in a user's browser) and Web beacons which may collect personal data. Additional information on how we use cookies and other tracking technologies and how you can control these can be found in our cookie notice on our Website.

2.5 The personal data that we may collect or obtain may include:

2.5.1 your name, gender, age and date of birth;

2.5.2 your contact information, such as your address and contact details (including your email and mobile telephone number);

2.5.3 country of residence;

2.5.4 lifestyle and social circumstances (for example, your pastimes);

2.5.5 family circumstances (for example, your marital status and dependents);

2.5.6 employment and education details (for example, the organisation you work for, your job title and your education details);

2.5.7 Government identifiers (for example your personal public service number, passport number, driver's licence)

2.5.8 financial and tax-related information (for example your income, investments and tax residency);

2.5.9 your postings on any blogs, forums, wikis and any other social media applications and services that we provide;

2.5.10 your IP address, your browser type and language, your access times; complaint details;

2.5.11 details of how you use our products and services.

2.6 The personal data we collect may also include so called 'sensitive' or 'special categories' of personal data, such as details about your: dietary requirements (for example, where Curve Consulting would like to provide you with lunch during a meeting); health (for example, so that we can make reasonable accommodations for you in our buildings or at our events) and sexual orientation (for example, if you provide us with details of your spouse or partner). We may also collect and process personal data relating to ethnic or racial origin e.g. multicultural networks. The legal grounds for processing special categories of personal data are set out in paragraph 4.2 below.

2.7 If you fail to provide us with this information, or you object to us processing such information (see paragraph 11 below) the consequences are that we may be prevented from processing your instructions or continuing to provide all or some of our services to you or our client.

3 Information provided by or about third parties

3.1 Where we are provided with personal data about you by our client or another third party, we take steps to ensure that the client or other third party has complied with the data protection laws and regulations relevant to that information; this may include, for example, that the client or other third party has provided you with notice of the collection (and other matters) and has obtained any necessary consent for us to process that information as described in this privacy notice.

3.2 If any information which you provide to us relates to any third party (such as a spouse, people who depend on you financially, or a joint account holder or beneficiary), by providing us with such personal data you confirm that you have obtained any necessary permissions from such persons to the reasonable use of their information in accordance with the above provisions, or are otherwise permitted to give us this information.

4 How we use information about you

4.1 We collect and process information about you and/or your business to enable us to provide our services to you and in order to meet our legal or regulatory obligations.

4.2 In addition, some of your personal data may be used for other business purposes. Examples of the types of uses are set out below:

Use of personal data to provide services to our clients

4.3 We will use your personal data to provide you or our clients or other third parties with services. As part of this, we may use your personal data in the course of correspondence relating to the services. Such correspondence may be with you, other third parties, our service providers or competent authorities. We may also use your personal data to conduct due diligence checks relating to the services.

4.4 Because we provide a wide range of services to our clients or other third parties, the way we use personal data in relation to our services also varies. For example, we might use personal data:

4.4.1 about a client's employees and customers in the course of conducting an audit (or similar activity) for a client; or

Use of personal data for other activities that form part of the operation of our business

5 We may also use your personal data for the purposes of, or in connection with:

5.5.1 applicable legal, regulatory or professional requirements;

5.5.2 requests and communications from competent authorities;

5.5.3 client account opening and other administrative purposes;

5.5.4 financial accounting, invoicing and risk analysis purposes;

5.5.5 client and prospect relationship purposes, which may involve: (i) sending you insights, opinions, updates, reports on topical issues or details of our products and services that we think might be of interest to you; (ii) contacting you to receive feedback on services; and (iii) contacting you to invite you to events, seminars, briefings;

5.5.6 recruitment and business development purposes (for example testimonials from a client's employees may be used as part of our business development materials with that employee's permission);

5.5.7 services we receive from our professional advisors, such as lawyers, accountants and consultants; or

5.5.8 protecting our rights and those of our clients.

Use of personal data collected via our Website

5.6 In addition to the purposes connected to the operation of our business above, we may also use your personal data collected via our Website:

5.6.1 to manage and improve our Website;

5.6.2 to tailor the content of our Website to provide you with a more personalised experience and draw your attention to information about our products and services that may be of interest to you; or

5.6.3 to manage and respond to any request you submit through our Website.

6 The legal grounds we use for processing personal data

6.1 We are required by law to set out in this privacy notice the legal grounds on which we rely in order to process your personal data. We rely on one or more of the following lawful grounds:

6.1.1 you have explicitly agreed to us processing your information for a specific reason;

6.1.2 the processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you;

6.1.3 the processing is necessary for compliance with a legal obligation we have such as keeping records for tax purposes or providing information to a public body or law enforcement agency; or

6.1.4 the processing is necessary for the purposes of a legitimate interest pursued by us, which might be:

(a) to provide our services to you or our clients and other third parties and ensure that our client engagements are well-managed;

(b) to prevent fraud;

(c) to protect our business interests;

(d) to ensure that complaints are investigated;

(e) to evaluate, develop or improve our services or products; or

(f) to keep you or our clients informed about relevant products and services and provide you with information, unless you have indicated at any time that you do not wish us to do so.

6.2 To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because either: (i) you have given us your explicit consent to process that data; (ii) we are required by law to process that data in order to ensure we meet our 'know your client' and 'anti-money laundering' obligations (or other legal obligations imposed on us); (iii) the processing is necessary to carry out our obligations under employment, social security or social protection law; (iv) the processing is necessary for the establishment, exercise or defence of legal claims or (v) you have made the data manifestly public.

6.3 Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent, if one of the other legal bases described above is applicable.

7 Sharing your personal data

7.1 In connection with one or more of the purposes outlined in the "How we use information about you" section above, we may disclose details about you to the following recipients, or categories of recipients:

7.1.1 third parties that provide services to us

7.1.2 competent authorities (including courts and authorities regulating us);

7.1.3 your employer and/or their advisers; your advisers;

7.1.4 any other person or organisation after a restructure, sale or acquisition of any division of Curve Consulting, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both);

7.1.5 credit reference agencies or other organisations that help us make credit decisions and reduce the incidence of fraud and other third parties that reasonably require access to personal data relating to you for one or more of the purposes outlined in the "How we use information about you" section above.

7.2 Our Website may host various blogs, forums, wikis and other social media applications or services that allow you to share content with other users (collectively "Social Media Applications"). Importantly, any personal data that you contribute to these Social Media Applications can be read, collected and used by other users of the application. We have little or no control over these other users and, therefore, we cannot guarantee that any information that you contribute to any Social Media Applications will be processed in accordance with this privacy notice.

8 Transferring your personal data outside Ireland

8.1 Information about you in our possession may be transferred to other countries (which may include countries outside the European Economic Area ("EEA")), such as jurisdictions in which and through which transactions are effected; jurisdictions linked to your engagement with us; jurisdictions from which you regularly receive or transmit information; or jurisdictions where our third parties conduct their activities.

8.2 You understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries,

including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

8.3 When we, or our permitted third parties, transfer your personal data outside the EEA, we or they will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the EEA. We or they may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your personal data where:

8.3.1 the transfer is to a country deemed to provide adequate protection of your personal data by the European Commission; or

8.3.2 where you have consented to the transfer.

8.4 If we transfer your personal data outside the EEA in other circumstances (for example because we have to provide such information by law), we will put in place appropriate safeguards to ensure that your personal data remains adequately protected.

8.5 We may share non-personal, de-identified and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership and promotional purposes.

9 Protection of your personal data

9.1 We use a range of physical, electronic and managerial measures to ensure that we keep your personal data secure, accurate and up to date. These measures include:

9.1.1 education and training to relevant staff to ensure they are aware of our data protection obligations when processing personal data;

9.1.2 administrative and technical controls to restrict access to personal data to a 'need to know' basis;

9.1.3 technological security measures, including fire walls, encryption and anti-virus software; and

9.2 Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

10 How long we keep your information for

10.1 We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

10.2 We will hold your personal data on our systems for the longest of the following periods: (i) as long as is necessary for the relevant activity or services; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise in respect of the services.

11 Your rights

11.1 You have various rights in relation to your personal data. In particular, you have a right to:

11.1.1 obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you;

11.1.2 be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from where it was obtained);

11.1.3 ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;

11.1.4 ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data; withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);

11.1.5 receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);

11.1.6 ask us to stop sending you marketing messages at any time by following the unsubscribe instructions in our communications or contacting us in the way set out in paragraph 13;

11.1.7 object to our processing of your personal data.

11.2 Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

11.3 We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change using the contact details set out in paragraph 13.1.

11.4 You may also use the contact details in paragraph 13.1 if you wish to make a complaint to us relating to your privacy.

12 Sending you marketing information

12.1 We may use your information from time to time to inform you by letter, telephone, email and other electronic methods, about similar products and services (including those of third parties) which may be of interest to you.

12.2 You may, at any time, request a change to your marketing preferences by following the instructions in communications from us or contacting us in the way described in paragraph 13.1 below.

13 Right to complain

13.1 If you wish to exercise any of the rights relating to your information set out above, or if you have any questions or comments about privacy issues, or you wish to raise a complaint about how we are using your information you can contact us in the following ways:

13.1.1 write to Data Officer, Curve Consulting, Bloomfield Avenue, Donnybrook Dublin 4

13.1.2 send an email to privacy@curve.ie

13.2 If you have any concerns about our use of your information, you also have the right to make a complaint to the Office of the Data Protection Commissioner (www.dataprotection.ie).

14 Changes to this privacy notice

14.1 We may modify or amend this privacy notice from time to time.

14.2 To let you know when we make changes to this privacy notice, we will amend the revision date at the top of this page. The new modified or amended privacy notice will apply from that revision date. Therefore, we encourage you to periodically review this notice to be informed about how we are protecting your information.

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