



PRIVACY POLICY STATEMENT

In accordance with General Data Protection Regulation, Active C&P Holdings Limited will protect the privacy of individuals when handling any personal information and ensure the firm is compliant, as far as possible, with relevant data protection and privacy laws by adhering to the following principles:

- Be transparent about its collection, use and disclosure of personal information
- Collect and use personal information fairly and lawfully
- Only collect personal information that it requires and only keep it for as long as is necessary
- Keep personal information accurate and up to date
- Respect the privacy rights of individuals granted by privacy laws
- Keep personal information secure

Outcome

In meeting these objectives the firm will:

- Commit to keep abreast of all applicable data protection/privacy laws of the jurisdictions in which we operate
- Take steps to provide appropriate training and support to ensure that all personnel are aware of our obligations under this Policy and follow our data protection procedures when handling the personal information of others
- Implement relevant security procedures and issue guidance to staff explaining their data protection and security obligations
- Ensure that when sharing personal information with third parties we do so only where necessary and seek assurances that the third party has adequate security procedures in place to protect such information
- Implement clear processes for individuals to raise concerns about how the firm processes their personal information and for resolving any such concerns
- Ensure our privacy notices are clear, accessible and give sufficient information about how we use and share personal information and where personal information can be updated or corrected
- Delete/destroy personal information no longer needed for its original business purpose in accordance with our retention and destruction policies and procedures, unless we have a legal obligation to retain personal information for a certain period

The policy will be reviewed annually to ensure that it remains relevant and appropriate or sooner should measures need to be taken to ensure its effectiveness. It is to be briefed to all employees during induction and made available to all interested parties upon request.

Signed:

Mr Jeremiah O'Donovan
Active C&P Holdings Limited

Date: November 2024