

DOING BUSINESS WITH US

Updated November 2023

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AN INTRODUCTION FROM OUR MANAGING DIRECTOR, CARL WIDGER

Let's be honest, how often are we presented with terms of business that are long enough to keep us busy for a month and require us to have a dictionary to hand to interpret the jargon? They might be useful as an aid to get us to sleep, but a clear explanation of what we need to know they are not!

We often talk about how full transparency, honesty and clarity are must-haves when you're entrusting us with your money, dreams and aspirations. And that is exactly what we aim to do in this booklet – to make the boring and confusing a little bit less of both, with everything about how we manage your business front and centre and all in one place, so you don't have to go searching.

Of course, there's always going to be some jargon included, and this is why our first meeting will always be face to face. That way, you can ask all the questions you have and we can give you answers in plain English. Face to face meetings will always be our preference throughout our relationship, but for those quick questions, we're always available for a catch up over Zoom, email or phone call.

If you're a prospective client, we hope this booklet helps explain what we do and what we are about in Metis Ireland. And for our new and existing clients, this is a very useful guide to refer to as a refresher on how we manage your portfolio and requests.

We look forward to hearing any comments or feedback on this booklet, and if you have any questions, please feel free to contact your Private Client Manager or any member of the team.

Carl Widger,
Managing Director.



METIS IRELAND TERMS

Effective from November 2023.

This booklet contains Our Investment Philosophy, Service and Fees, Metis LifePlan, Our Contract with You, Our Promise to You, Statement of Suitability, Account Changes, Metis Ireland Portfolio, Terms of Business and Client Privacy Notice collectively known as the 'Terms'.

Please note this document contains the Terms by which Metis Ireland will act and our aims in acting for you. The Terms will apply to our relationship and services generally, where additional and specific terms apply to a particular piece of business, you should consider these carefully before proceeding. Where there is any inconsistency between these Terms and such specific terms and conditions relating to a particular piece of business, the provisions of those specific terms and conditions will apply.

The Terms shall apply to all new and existing clients of Metis Ireland from November 2023. For existing clients, these Terms shall supersede all previous agreements entered into between you and us.

It is important that you read these Terms carefully as they set out the basis on which we will act for you.

OUR INVESTMENT Philosophy

The word 'philosophy' can make things sound heavy and hard to get through, but a philosophy can be simple.

It can be so simple, in fact, that it can be summed up in a single phrase, even a hashtag – for example something like:

#STICKWITHTHEPLAN

- which you'll be hearing from us again, possibly more than once.

But as simple as that may be – and it's absolutely true – it's deceptive too. It's really a distillation of all the experience and expertise we've amassed over the years in understanding how markets – and people – really work.

Our 10 Key Principles

01 You can't predict the markets 02 You can trust the markets

Nobody can. We'd rather spend your time and ours building an intelligent, flexible plan to keep you on track, whatever the future holds.

03 Beware the real risk: inflation

We all know about market crashes, but what about inflation? The real risk is not growing your money enough to reach your goals.

05 Think ahead - far ahead

When we plan, we're planning for your life, your future, and your legacy. The ripples you create now will become waves decades from now.

07 Expect Setbacks

Your investments will still have ups and downs. The important thing is to keep your emotions in check and avoid knee-jerk reactions.

09 Control the controllable

You can't control what the markets are doing, but you can control your reaction to them and choose to #StickWithThePlan.

While we can't predict what will happen, one thing we do know is that the global market is reliable and holds up in the long term.

04 Trust in evidence-based investing

The evidence tells us that, mathematically, patience is rewarded. Screen out the noise and #StickWithThePlan.

06 Be smart about diversification

We'll see to it that your eggs are liberally distributed across a wide range of global baskets.

08 Look beyond the headlines

Market drops make great headlines, but they're more interested in selling papers than providing accurate market updates. Learn to ignore them.

10 Your Metis LifePlan is your benchmark

It really doesn't matter how anybody else's investments are doing. All that matters is your own progress towards the life you want.



SERVICE AND FEES

This guide will help you to understand the service we provide and the cost of our service.

We know that you want to be clear on how much you'll pay for financial advice. At Metis Ireland we pride ourselves on being transparent and striving to provide value-for-money.

At the initial Metis Ireland discovery meeting, we discuss your objectives and requirements. This service is offered on a complimentary basis.

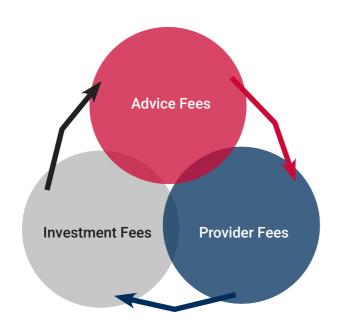
At this meeting, we'll advise you of our fee structure and fees specific to you, which we then confirm in writing. As everyone is different, these can vary. However, all clients are likely to pay three types of fees which make up the annual management charge.

These three fees are:

Advice Fees - what you pay Metis Ireland

Provider Fees – what you pay the life company/product provider

Investment Fees – what you pay the fund manager



HOW OUR TIME STACKS UP

20%

Listening to you and understanding your goals.

20%

Building your unique Metis LifePlan based on what we learn.

60%

Being there for as long as you need us, to help you stick with the plan, allay fears and remind you that you're playing the long game.

0%

Predicting, prognosticating, guessing or otherwise divining how markets will move and what the 'next big thing' might be.

Checking that you're paying attention.



^{*} In some instances we may receive a higher fee directly from the product provider, this will always be disclosed in your recommendation

Service Level	Zeus	Oceanus	Tethys
Maximum Initial Client Fee*	0.50%	2%	4%
Maximum Ongoing Client Fee	0.75%	1%	1%
Minimum Investment Assets	€1m	€500k	€200k
Includes Cashflow Modelling?	Yes	Yes	No
Includes Metis LifePlan Individual Plan	Yes (at cost outlined below)	Yes (at cost outlined below)	Yes (at cost outlined below)
Annual Metis LifePlan Review?	Yes	Yes (at cost outlined below)	Yes (at cost outlined below)
Unlimited Access To Metis Team?	Yes	Up to four meetings or calls per year	One review call per year
Assigned Private Client Manager, Financial Planner and Client Service Associate?	Yes	Yes	Assigned Financial Planner and Client Service Associate
Online Access Through Metis Login?	Yes	Yes	No
Who Is It Right For?	A Zeus client might be someone with a lot of different assets to organise - someone who wants frequent, expert advice and a fully integrated end-to-end financial action plan.	An Oceanus client might be someone who has accumulated wealth over the years and now needs some expert guidance to make sense of it, so that the future looks clearer.	Tethys clients are fairly confident with knowing their way around their finances. What they need is the ability to check in with the dedicated professional as and when they need it, to make sure they're staying on track.

Metis LifePlan Fees: If your service level includes your Metis LifePlan at extra cost, or you'd just like to work with us on a stand-alone Metis LifePlan and arrange reviews as and when you need them, we've outlined our fees below.

Initial fee range €500 - €3,000 plus VAT I Review fee €500 plus VAT.

We promise to always fully disclose the fees and charges applicable to your investment, pension of risk contracts. Metis Ireland Financial Planning Ltd t/a Metis Ireland is regulated by the Central Bank of Ireland.

Please be aware that Metis Ireland is remunerated by commission from product providers. If we receive commission from a product provider, this may be offset against our fee.

If there are any material changes to our fees and charges you will be contacted in advance. If there are any material changes to third party charges, we will endeavour to notify you to the extent that we have been pre-advised by the third party.



COMMISSION PAYMENTS

While you can pay Metis Ireland directly by fee, we're most commonly remunerated by commissions from product producers. Commission is usually paid as a percentage of the premium paid or amount invested. We have provided some examples below with a full list available on our website, but we'll always disclose the specific commissions in writing to you.

Types of commission

Single Commission Payment

Payment is based on a percentage of the premium paid / amount invested

Initial Commission Payment

Payment is based on a percentage of the premium paid / amount invested

Trail Commission Payment

Payment is based on a percentage of the underlying value of the investment

Renewal Commission Payment

Payment is made at intervals throughout the term of the policy or product, usually a percentage of the premium paid

Indemnity Commission Payment

Payment is made before the commission is deemed to be earned, so in advance. Indemnity commission may be subject to a clawback (obligation to repay unearned commission previously paid) should a client lapse or cancel the product before the commission is deemed to be earned



How commission applies to different products

Life Assurance Company: Life Assurance, Investments and Pension Product

For Life Assurance products, commission is divided into initial commission and renewal commission (related to premium), fund based or trail (relating to accumulated fund).

Trail commission, bullet commission, fund based, flat commission or renewal commission are all terms used for ongoing payments. Where an investment fund is being built up though an insurance-based investment product or pension product, the increments may be based on a percentage of the value of the fund or the annual premium. For a single premium/lump sum product, the increment is generally based on the value of the fund.

Life Assurance products fall into either individual or group protection policies and investment/pension products would be either single or regular contribution policies. Examples of products include Life Protection, Regular Premium Life Assurance Investments, Single Premium (lump sum) Insurance-based Investments, and Single Premium Pensions.

Product Producer: Investments and Pension Products

Investment firms, which fall within the scope of the European Communities (Markets in Financial Instruments) Regulations 2007 (the MiFID Regulations), offer both standard commission and commission models involving initial and trail commission. Increments may be based on a percentage of the investment management fees or on the value of the fund.

More information on commission structures can be found on our website here: https://metisireland.ie/charges/. We'll always advise you on the specific commission structure in writing to you.

METIS Lifeplan

WHAT IS THE METIS LIFEPLAN?

Before we crunch a single number, we listen – to what motivates you, what worries you, where you are now and where you want to be.

Understanding who you are and what you want from life means we can build you a tailored, intelligent financial life strategy.

It's the only plan you'll need - your Metis LifePlan.

Your Metis LifePlan is based on everything you've told us about your situation and goals. It will evolve over time. Whether small or big, changes to your own circumstances and what happens in the markets mean that over the years your Metis LifePlan will adapt from time to time.

But it'll always be the one reliable route to the future you want.

The process of drawing up your Metis LifePlan and putting it into action is based on our six key steps. They're all important and they all mark pivotal points in your journey towards meeting your financial goals.

Overleaf we'll introduce them to you.

STEP 1:

LIFE-CENTRED APPROACH

STEP 2:

OBJECTIVITY

Preparing your Metis LifePlan

Getting to know you and your

We're here to help you reach your financial

and life goals, it's that simple. So before we do

anything else, we listen - to who you are, what

you want from life and what really matters to

ambitions and from there, how you'll go on to

you. We'll work together to understand your

family

achieve them.

We'll bring structure and reassurance to the road ahead, but we'll bring objective expertise too, keeping you away from emotional decisions and helping you to stick with the plan. Your plan is unique, for you and your family, it's your route to reaching your goals and we'll make sure you have everything you need to understand and follow it.

STEP 3:

ORGANISATION

Presenting your Metis LifePlan

It's more than a document — it's the beginning of a partnership. We're here to help you keep your financial house in order with lifetime cash flow modelling of your current and anticipated income, expenses, assets and liabilities. We'll help with tax planning, investments and your legacy too. You've worked hard, so let us give you confidence and clarity for the years ahead.

STEP 4:

KNOWLEDGE

STEP 5:

ACCOUNTABILITY

Our recommendation for you

Once we've agreed the right strategy, we'll put together a report that shows the best options for you. We'll make sure you understand your situation and we'll take you through each option, explaining why it could work for you. It's your decision, but we're here to make sure you have everything you need to make it the right one.

Implementing your Metis LifePlan

Of course, we don't just hand you the plan and wish you well. When you're happy to go ahead, we'll take care of the paperwork and administration, but we'll be right here whenever you need us. We'll help you to see it through, prioritise your goals, answer your questions and keep you pointed in the right direction.

STEP 6:

PROACTIVITY

Reviewing your Metis LifePlan

And we'll keep on doing it. We'll meet with you each year to review your Metis LifePlan. Circumstances can change, your own and those in the market, so we need to keep checking you're still on course. Your goals may alter over the years, and if they do, we'll make sure your Metis LifePlan grows with you, so it's always focused on what you want out of life.

OUR CONTRACT WITH YOU

- We will always act with integrity and in your best interests.
- We will continuously strive to earn your trust by providing 'Honest Experienced Financial Planning' for you and your family.
- Meeting your long-term lifestyle and financial goals is always our priority.
- We will create a Financial Plan that will dictate what financial products you need. The Financial Plan always comes first.
- Metis Ireland will provide you with great clarity in respect of your finances.

- We will tell you the truth about your money. This may sometimes mean delivering unpleasant truths, as we believe comforting lies are pointless.
- We have a tried and trusted guiding principle: #StickWithThePlan". We cannot predict the future the truth is no-one can.
- We believe your investment and pension portfolio should be cost-efficient, tax-efficient, and diversified.
- We believe in evidence-based investing which is based on academic research and evidence over a long period of time.
- Our team will be highly qualified, energetic and client-focused at all times.

METIS IRELAND WILL ALWAYS BE SYNONYMOUS WITH WORLD-CLASS FINANCIAL PLANNING.

OUR PROMISE TO YOU

We're human, so mistakes will happen. Heck, even computers are known to make mistakes from time to time (I'm sure we all have embarrassing examples of auto correct going wrong!). But what we do when a mistake is discovered is what sets us apart.

Our promise to you is that we'll swiftly fix any mistakes we make, and make sure you don't lose out. We'll be upfront and keep you informed every step of the way – there'll be no brushing of mistakes under the carpet, and we'll learn from what went wrong to ensure our systems and team continue to evolve to offer the best service to you.

How can you help?

By contacting us if you spot an error or think something isn't right and allowing us the opportunity to fix any problems.



RECOMMENDATIONS

For all new business, you'll be provided with a recommendation letter which will summarise where you are and where you want to be. It will detail what we believe is the best plan for you, which product best suits your plan, the risk levels and all fees and charges.

For any top ups, we'll provide you with a shortened recap of your policy, which will remind you of the product, fund, risk level and all fees and charges.

It's important that you read all the information provided within the recommendation and any supporting documentation prior to completing any application forms. This will help ensure you understand the funds, risks, and fees and charges that will apply.

Execution Only

From time to time you may request that Metis Ireland assist you with an investment that we have not provided any advice on. In this scenario, we'll provide you with what's known as an 'execution only' recommendation, which will detail some aspects of the above but will clearly state that we have not provided you with any advice.



FUND SWITCHES, ENCASHMENTS, BUYING AND SELLING

Metis Ireland work on the principle of two-factor authentication. This means we'll always require instructions in a written format which will also be confirmed verbally via telephone or face to face meetings.

If you contact us by phone, we'll advise you that a written instruction is required before your request is actioned. If there's a delay in receiving your written instruction, this will cause a delay in your instruction being actioned.

If you contact us by email or letter, we'll contact you by phone to confirm the instruction. If we can't reach you by phone, this will cause a delay in your instruction being actioned.

When we've received both written and verbal instruction, the written instruction will be actioned with the product provider in line with their terms and conditions that you will have received with your original policy documents. This can be requested at any time from the product provider.

It's important to note that the value of funds may fall from receipt of instruction to the time of instruction being actioned by the product provider.

ACCESSING YOUR METIS IRELAND MANAGED PORTFOLIO

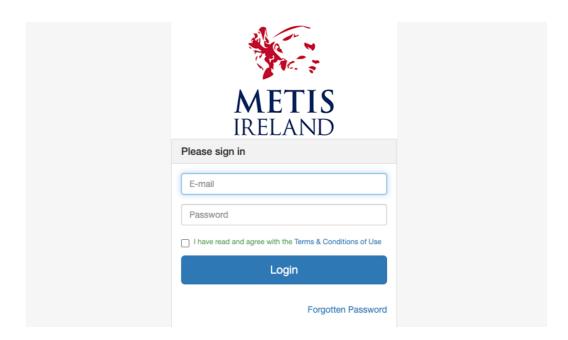
Metis Ireland can provide access to our online system, where you can view all your accounts that are in our agency.

To access your Metis Ireland Portfolio, please go to our website www.metisireland.ie.

When you click on the 'CLIENT LOGIN' button you will be directed to a page to confirm you are not a robot. If you are not a robot, please confirm that fact here.



Once you have confirmed your human status you will be taken to the login page as shown below. Your login details will be provided to you separately. Enter these here and tick the box to confirm you have read and agree with the Terms & Conditions. Then, click Login. This will take you to your Portfolio dashboard.



TERMS OF BUSINESS



These Terms of Business including Remuneration details and Schedule of Fees & Charges set out the basis upon Metis Ireland Financial Planning Ltd t/a Metis Ireland will provide Financial Advisory services to you. They also contain details of our regulatory and statutory obligations and the respective duties of both our firm and you in relation to such services. This is an important document – please read carefully and if you have any questions please contact us. If there are any material changes to the information in this document you will be issued with a revised copy as soon as possible.

Authorised Status

Metis Ireland (C65237) is regulated by the Central Bank of Ireland as an Investment Intermediary and Deposit Broker under the Investment Intermediaries Act 1995 (as amended) and as an Insurance Intermediary under the European Union (Insurance Distribution) Regulations 2018. Copies of our statements of Authorised Status from the Central Bank of Ireland are available on request. Alternatively the Central Bank of Ireland holds registers of regulated firms which can be viewed on their website www.centralbank.ie.

Statutory Codes

Metis Ireland is subject to and complies with the Consumer Protection Code, Minimum Competency Code and Fitness & Probity Standards. These Codes offer protection to consumers and can be found on the Central Bank of Ireland website www.centralbank.ie.

Financial Services Provided

Financial Services: Investment Intermediary Services, Insurance Based Investment Services, Life Assurance, Pensions & Retirement Planning Services.

Financial Products: Investment Products, Insurance Based Investment Products, Life Assurance Products, Deposits Products, Pensions and Retirement Planning Products.

We offer advice on a fair and personal analysis basis in relation to all Financial Services products and services. Fair analysis of the market means providing services on the basis of a sufficiently large number of contracts or investment products and product producers available on the market to enable us to make a recommendation, in accordance with professional criteria, regarding which contract or investment product would be adequate to meet your needs and requirements.

We offer our clients an extensive choice of suitable products that best serve their needs and circumstances. On receipt of your instructions we will transmit orders on your behalf to one or more Insurers/Product Producers with whom we hold a written appointment (a list of which is available on request).

We do not have any 'tied' relationships with any institution that would compromise our ability to offer you impartial advice and choice. We do not guarantee nor make representations in regard to, and expressly disclaim responsibility for the financial security of the Insurance Companies and Product Producers with which we place business.

Periodic Assessment of Suitability: Insurance Based Investments Products (IBIP) and other Investment Instruments (MiFID)

Ongoing suitability assessments will form part of the service to clients whose investments come under the remit of the MiFID Regulations 2017 and the Insurance Distribution Regulations 2018. Where your investment falls under these regulations we will provide you, on an annual basis, with a client report summarising how the product continues to meet your investment needs and objectives and your risk profile or not as the case may be determined.

Sustainability

In accordance with the Sustainable Finance Disclosure Regulation ('SFDR'), we inform you that when providing advice on investment and insurance-based investment products, we assess, in addition to relevant financial risks, relevant sustainability risks as far as this information is available in relation the products proposed/advised on. We review product provider literature in relation to sustainability risks, we liaise with the providers in relation to any queries in relation to the funds. This information is reviewed by the firm on an ongoing basis.

Considering Principal Adverse Impacts on sustainability factors in the advice:

When providing advice on insurance-based investment products ('IBIPs') or investment advice we assess the Principle Adverse Impacts (PAI) information published by product manufacturers as follows: the firm will examine the Product Providers literature to establish the Principal Adverse Impacts for the relevant products. The firm will then compare financial products across available providers to make informed investment decisions about the suitability of ESG products for individual clients.

Remuneration Details and Schedule of Fees and Charges

Remuneration Financial Services: Investment Intermediary and Insurance Intermediary

We will be remunerated for the financial services we offer you, our client, in a number of ways:

 By commission, fee, and other types of remuneration earned from Insurers and Product Producers to whom orders are transmitted. Summary details of these payments will be included in a product information document which you will receive. In addition, we may earn a non-monetary benefit which we will only accept if it enhances the quality of our service to you our client. For example: attendance at a product seminar or assistance with branding, IT support etc. and/or

- By you directly in the form of a fee which we will discuss and agree in advance of all transactions; see See our Professional Fees Table which is enclosed in our 'Doing Business with us' brochure, and is available in our office and on our website - www.metisireland.ie.
- You also have the option to pay for the services we provide by way of a combination of commissions and fees which we will discuss and agree in advance of all transactions.
- A summary of all remuneration arrangements from each Insurer and Product Producer is available on our website www.metisireland.ie.

Handling Clients' Money

We will accept payments in respect of all classes of insurance in the circumstances permitted under Section 25G of the Investment Intermediaries Act, 1995 (as amended). The Company is not authorised to accept negotiable instruments in any other circumstances.

Receipts

Our firm will issue a receipt for each negotiable or non-negotiable instrument or payment received pursuant to Section 30 of the Investment Intermediaries Act 1995 (as amended) and under the Insurance Distribution Regulations 2018.

Conflicts of Interest

It is the policy of our firm to avoid conflicts of interest in providing services to you. However, where an unavoidable conflict of interest arises we will advise you of this in writing before providing you with any service.

Disclosure of Information: Duty of Disclosure

The Consumer Insurance Contracts Act 2019 (CICA) has changed the precontractual, alteration and renewal duties of the Consumer and Insurer.

Prior to 1 September 2021 at the pre-contractual, alteration and renewal stage of a contract of insurance, the principle of utmost good faith (uberrima fides) and the duty of disclosure rested with the consumer, including a duty on the consumer to volunteer information, that could be material to the underwriting of the risk. Post 1 September 2021 the pre-contractual, alteration and renewal duty of disclosure of a consumer is confined to providing responses to questions asked by the insurer. The consumer is not under any duty to volunteer any information over and above that required by such questions. Where the insurer requests the consumer at the pre-contractual, alteration and renewal stage to

provide information to the insurer, the insurer will be under a duty to ask specific questions, on paper or on another durable medium, and will not use general questions.

As a consumer you have a duty to respond to the insurer questions honestly and with reasonable care. As your Broker, we can support you in your understanding of the questions asked by the insurer. However, responsibility for providing honest answers to the questions asked rests with you directly. Non-Consumers are not within the scope of the CICA.

Default on payments by clients

Our firm will exercise its legal rights to receive payments due to it from clients for services provided.

Insurers/Product Producers may withdraw benefits or cover in the event of default on payments due under policies of insurance arranged for you. We would refer you to policy documents or product terms for the details of such provisions.

Cancellation

You, the customer, can cancel your policy at any time by giving notice in writing subject to the terms and conditions of the applicable policy.

Complaints

We ask that you make any complaint against our firm, relating to services provided by us, preferably in writing however, verbal complaints will also be accepted. We will provide a written reply to all complaints received. A written update will be issued to you every 20 days by a nominated individual within our firm. A comprehensive response to your complaint will be issued within 8 weeks of receipt of your initial complaint. You are entitled to refer the matter to the Office of the Financial Services & Pensions Ombudsman (01-5677000 or info@fspo.ie). A full copy of our complaints procedure is available on request.

Investor Compensation Scheme

We are members of the Investor Compensation Scheme established under section 30 of the Investor Compensation Act 1998. The Act provides that compensation shall be paid to eligible investors (as defined in the Act) to the extent of 90% of an investor's net loss or €20,000, whichever is the lesser, and is recognised as being eligible for compensation. Further details are available on request.

Governing Law and Language

The laws of Ireland form the basis for establishing relations between you and our firm. All contracts, terms, conditions and communications relating to any policies you may enter into with this firm will be in English.

Anti - Money Laundering/Countering the Financing of Terrorism

Our firm reserves the right to request any facts about a client which it reasonably believes it needs to know in order to comply with the prevailing Criminal Justice (Money Laundering and Terrorist Financing) legislation.

Data Protection

Metis Ireland complies with the requirements of the General Data Protection Regulation 2018 (GDPR) and the Irish Data Protection Act 2018.

We collect your personal details in order to provide the highest standard of service to you and are committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a client. The data will be processed only in ways compatible with the purposes for which it was given and as outlined in our Data Privacy Notice, this will be given to all our clients at the time of data collection. Please contact us at dataprotection@metisireland.ie if you have any concerns about your personal data.

Direct Marketing

We would like to keep you informed of various Pension, Insurance, Investment and any other services provided by us or Associated Companies with which we have a formal business arrangement, and which we think may be of interest to you. If you do wish to receive such marketing information you can opt in, in the client declaration once you formally become a client of the firm.

These Terms of Business are valid from November 2023 until further notice.

CUSTOMER PRIVACY NICTICE



At Metis Ireland we endeavour to ensure that the personal data of all our customers is collected and managed in line with the requirements of the GDPR and that our customers understand how their personal data is managed.

Metis Ireland Responsibilities

- The GDPR Officer at Metis Ireland is responsible for ensuring that this notice is made available to customers before we collect and, or process their personal data.
- All Employees and Staff of Metis Ireland who engage with customers are responsible for ensuring that the customer is aware of this notice and that the customer's consent to the processing of their data has been secured and documented.

Who are we?

At Metis Ireland placing the customer at the centre of everything we do guides our strategic planning. We forge long-term relationships with our customers by constantly adhering to our core values.

We have assembled a highly qualified and vastly experienced team to ensure that we are always offering our clients the best possible financial solutions. We continue to invest and encourage ongoing employee education and we are certain that this will help us remain ahead of the curve.

Personal Data

What is Personal Data?

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

What Personal Data does Metis Ireland hold about me?

The personal data that we may collect or process about you, our customer, can include the following:

- Contact information, including Name, Address, Phone and Email. Photo ID and Proof of Address
- Health / Medical information
- PPS number
- Financial Information (Bank details, policy numbers)

Why does Metis Ireland need my personal data?

Metis Ireland collects and uses your personal data to deliver the services which you have requested or subscribed to, for example retirement planning or financial management.

All personal data given to us by you will be used only for the purpose for which you supply it and will be treated in accordance with General Data Protection Regulations. We will only use your information so that we can provide a comprehensive service to you. This may include updates, advice and information relating to the services that you have requested or services which we believe would be beneficial to you.

At Metis Ireland we strive to improve the services and communications that we provide to our customers through the ongoing development of our IT systems and software. At times we use customer personal data to facilitate that development as follows:

- to gain a better understanding of our services, and to allow new product and service development;
- to tailor our services to allow us to meet customer needs
- · to allow us to predict trends and produce market insights;
- to undertake modelling to identify improvements customer reporting and service delivery efficiencies;
- to store, access and backup information.

If you have given your consent to receive marketing material from us, we aim to provide you with information that is relevant and personal.

By providing your personal data, and where you have agreed to receiving communications from us, we may also use the information as follows:

- to personalise the marketing information that we issue;
- to send information that we consider may be of interest to you;
- to collate data gleaned from surveys or to produce market insights;
- to segment and distribute targeted marketing materials;
- · to follow up with attendees of our events
- to ask for opinions about our products or services.

Please notify us immediately of any changes in relation to your personal data so that we can ensure the accuracy of your personal data (eg. change of address or telephone number).

Does Metis Ireland need all this personal data about me?

We only collect the data that we need to provide the service(s) that you have requested. We must collect sufficient personal data in order to identify you as an individual. The GDPR prevents us from collecting data which we do not need for legitimate purposes. We aim not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions.

Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access, disclosure or loss.

Lawful Basis for Processing Personal Data

The GDPR requires that we have to have a lawful basis for processing all personal data that we hold. We process all customer personal data in a manner that complies with the GDPR and in line with reasonable expectations.

Our legal basis for processing your personal data is that you have explicitly given your consent to us. This consent can be given at the time when you initially seek our services, or having read the Customer Privacy Statement, that you consent to us processing the personal data you have supplied us.

It is considered by Metis Ireland, to be reasonable to use customer personal data for the legitimate interests of our business relationship or potential relationship with our customers.

Where necessary, in limited circumstances and in accordance with the law we may use customer personal data in the defense of legal claims.

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Metis Ireland to process personal data. Where we are asking you for sensitive personal data we will always request your consent before processing.

You may withdraw consent at any time by contacting our GDPR Officer.

Who will Metis Ireland share my personal data with?

We may also share your details with third parties in order to fulfil our contractual, legal and regulatory obligations. These third parties may include, but not be limited to, Accountant, Solicitor and other Business Advisors, Subcontractors, Consultants or Professional Services providers and IT Services providers.

All Third Parties engaged by Metis Ireland must comply with the General Data Protection Regulations. When they no longer need your data to fulfil this service, the third parties will dispose of your personal data in line with Metis Ireland's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

Your personal data will not be shared for marketing purposes without your consent.

In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. Metis Ireland has safeguards in place to ensure the security of your data in the event that such a transfer takes place.

How long will Metis Ireland keep my personal data?

Metis Ireland will only retain personal data for as long as it is needed for the purpose for which it was collected. Once the retention period for a record has passed, that record is deleted from our systems. In some instances, Metis Ireland is required to retain information in accordance with the law, such as information needed for Revenue and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business- sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

What are my rights in relation to my personal data once I give it to Metis Ireland?

At any point whilst we are storing or processing your personal data, you as the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Metis Ireland refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the complaints section below.

All requests will also be forwarded to any third party who is in the processing or storage of your personal data.

How can I find out the personal data Metis Ireland holds about me?

Metis Ireland, at your request, can confirm what information we hold about you and how it is processed. If Metis Ireland does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- · Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Metis Ireland or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- · Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international
 organisation, information about how we ensure this is done securely. The EU has
 approved sending personal data to some countries because they meet a minimum
 standard of data protection. In other cases, we will ensure there are specific
 measures in place to secure your information.
- · How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide to prove that I am the data subject?

Metis Ireland accepts the following forms of ID when information on your personal data is requested:

Passport, Driving licence, Utility bill (not older than 3 months), Bank statement (not older than 3 months), Revenue / Social Welfare documentation (not older than 3 months).

How do I make a complaint?

If you wish to make a complaint about how your personal data is being processed by Metis Ireland, by third parties engaged by Metis Ireland, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Metis Ireland's GDPR Officer.

Metis Ireland GDPR Officer

If you have any queries or concerns about your personal data, our GDPR Officer can be contacted in the following ways:

By Letter

GDPR Officer Metis Ireland, 88 O'Connell Street Limerick, V94 RPC5, Ireland.

Telephone: 061 518365

Email: dataprotection@metisireland.ie

Supervisory Authority

Data Protection Commissioner of Ireland Office of the Data Protection Commissioner.

Canal House Station Road, Portarlington, Co. Laois R32 AP2, Ireland.

Telephone: +353 (0761) 104 800 or LoCall 1890 25 22 31

Email: info@dataprotection.ie



Metis Ireland Financial Planning Ltd t/a Metis Ireland is regulated by the Central Bank of Ireland.

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88 O'Connell Street Limerick V94 RPC5 T: 061 518 365

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