

Personal Data Processing Policy

Introduction

This Personal Data Processing Policy ("Policy") outlines the methods and principles adopted by CH Advisors Limited ("we", "us", "our") to process personal data in accordance with the General Data Protection Regulation (GDPR) and other relevant European data protection laws. This Policy is intended to inform our customers, partners, and other stakeholders about how we collect, use, and protect personal data.

Scope

This Policy applies to all personal data processed by CH Advisors Limited in the context of providing payment processing services and completing customer due diligence (CDD) for onboarding at financial institutions.

Data Controller and Data Protection Officer

CH Advisors Limited is the data controller for the personal data we process. For any inquiries regarding this Policy or data protection concerns, please contact our Data Protection Officer (DPO) at:

Data Protection Officer
Colm Hughes
Email: colm.hughes@chadvisors.ie

Types of Data Collected

We collect the following types of personal data:

1. Identification Data: Full name, date of birth, nationality, gender, and government-issued identification numbers (e.g., passport number, national ID).
2. Contact Data: Address, email address, and phone numbers.
3. Financial Data: Bank account details, payment card information, transaction history, and credit history.
4. KYC Data: Documents and information collected for customer due diligence, such as proof of address, source of funds, and employment information.
5. Technical Data: IP addresses, login data, browser type and version, time zone setting, and device information.
6. Usage Data: Information about how you use our services, including transaction details and interaction with our platform.

Purposes of Data Processing

Customer Due Diligence (CDD) for Onboarding

To comply with legal and regulatory requirements, we collect and process personal data to:

1. Verify the identity of our customers.
2. Conduct background checks and risk assessments.
3. Monitor and report suspicious activities to relevant authorities.
4. Maintain records as required by law.

Processing Payments

To facilitate and process payment transactions, we collect and process personal data to:

1. Execute and manage payment transactions.
2. Authenticate and authorize transactions.
3. Prevent fraud and enhance security.
4. Provide customer support and resolve disputes.

Legal Basis for Processing

We process personal data based on the following legal grounds:

1. Consent: When you provide explicit consent for specific processing activities.
2. Contractual Necessity: To fulfill our contractual obligations with you.
3. Legal Obligation: To comply with legal and regulatory requirements.
4. Legitimate Interests: To pursue our legitimate interests, provided that your rights and interests do not override these interests.

Data Sharing and Disclosure

We may share personal data with:

1. Financial Institutions: To facilitate CDD and payment processing.
2. Service Providers: Third-party vendors who provide services on our behalf.
3. Regulatory Authorities: When required by law or regulation.
4. Business Partners: For joint marketing and other collaborative activities, with your consent.

Data Security

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, alteration, disclosure, or destruction. These measures include encryption, access controls, and regular security assessments.

Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, including legal, accounting, or reporting requirements. The retention period may vary depending on the nature of the data and the legal obligations.

Data Subject Rights

You have the following rights regarding your personal data:

1. Right to Access: Request access to your personal data.
2. Right to Rectification: Request correction of inaccurate or incomplete data.
3. Right to Erasure: Request deletion of your personal data under certain conditions.
4. Right to Restrict Processing: Request restriction of processing under certain conditions.
5. Right to Data Portability: Request transfer of your data to another organization.
6. Right to Object: Object to the processing of your personal data under certain conditions.

To exercise these rights, please contact our DPO using the contact details provided above.

Changes to this Policy

We may update this Policy from time to time. Any changes will be posted on our website, and where appropriate, notified to you via email or other communication channels.

Contact Us

For any questions or concerns regarding this Policy or our data processing practices, please contact our DPO at:

Data Protection Officer
Colm Hughes
Email: colm.hughes@chadvisors.ie

Effective Date: [Date]

CH Advisors Limited is committed to protecting your personal data and ensuring transparency in our data processing activities. Thank you for trusting us with your information.