

Rockwell List of Sub- Processors

September 2026



Rockwell Financial Management uses a number of data sub-processors to perform our Services to customers. All sub-processors acting on our behalf only process your data in accordance with instructions from us and comply fully with our Privacy Policy, data protection laws, and appropriate confidentiality and security measures. A list of these sub-processors is outlined below.

Calendly

Calendly is a scheduling platform we use to arrange and manage meetings with advisors. More information: <https://calendly.com/>

Google Analytics

Google Analytics is a web analytics service offered by Google LLC. It tracks and reports website traffic. More information: <https://analytics.google.com/>

Google Tag Manager

Google Tag Manager is a tag management system offered by Google LLC, allowing us to deploy and manage analytics and measurement tags on our website. More information: www.tagmanager.google.com

Cookiebot

Cookiebot is a Consent Management Platform used to scan our website for cookies, present our cookie consent banner, and maintain a record of visitor consent choices. More information: www.cookiebot.com

TikTok

TikTok is used for targeted advertising and to measure the effectiveness of our advertising campaigns. More information: <https://www.tiktok.com/>

Meta (Facebook and Instagram)

Meta platforms are used for targeted advertising and to measure the effectiveness of our advertising campaigns. More information: <https://www.meta.com/>

Stripe

Stripe is a payments and financial infrastructure provider, which we may use for payment processing purposes where applicable to our services. More information: <https://stripe.com/>

Soundcloud

Soundcloud is an audio streaming platform, which we may use to embed audio content on our website. More information: <https://soundcloud.com/>

- When you contact us or submit an enquiry through our website contact form
- When you book a consultation with an advisor (via Calendly)
- When you become a client and engage us for financial advice or wealth management services
- When you attend one of our events (e.g. the Rockwell Insights Series)
- When you interact with our website (see Cookie Policy) or engage with us on social media

We may also receive technical data about you from analytics and advertising providers — see 'Our Use of Analytics' and 'Our Use of Targeted Advertising' below.

How and Why We Use Your Personal Data

We only process personal data where we have a lawful basis to do so:

- Performance of a contract — e.g. providing financial advice or wealth management services you have engaged us for
- Legal obligation — e.g. Central Bank of Ireland and anti-money laundering (AML) requirements, including identity verification and record-keeping
- Legitimate interests — e.g. responding to enquiries, improving our website and services, and communicating with existing clients about relevant services
- Consent — e.g. sensitive/health data, and marketing communications where consent is the applicable basis

How We Share Your Data

We share personal data with trusted categories of third party where necessary to provide our services, including:

- Product providers (pension, investment and insurance providers we work with as a multi-agency intermediary)
- IT, cloud hosting and software providers
- Professional advisers (e.g. our own lawyers, accountants and auditors)
- Analytics and advertising providers (see below)

A full list of our data sub-processors is available on request by emailing info@rockwellfinancial.ie.

We may use Stripe for payment processing purposes, where applicable to our services.

We may embed third-party media on our website, such as Soundcloud, for audio content.

Fraud Prevention and Law Enforcement

As part of fraud monitoring and prevention, we may be legally required to share your personal data with government bodies and law enforcement. These bodies may retain a record of the information we provide to them for this purpose.

Sale or Merger

We may share your personal information as part of a merger or acquisition. If Rockwell is involved in a merger, financing, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets, or in the event of a liquidation, insolvency, bankruptcy, or receivership, we may share your information with that company before and after the transaction closes. Unless otherwise directed by applicable law, your information would remain subject to the terms of the applicable privacy policy in effect at the time of transfer, and you will be notified of any such changes in advance.

Marketing Preferences

We may send you direct marketing communications, product information and promotional offers where you have consented, where we have an existing business relationship and can rely on legitimate interest, or where the law of your country otherwise permits.

You will always have full control of your marketing preferences. If you do not wish to continue receiving marketing information from us:

- Unsubscribe using the link included in any marketing communication from us; or
- Withdraw your consent at any time by emailing info@rockwellfinancial.ie

Customers in the EEA and UK also have the right to object to their data being processed for direct marketing at any time, by contacting us at the same address. We aim to process all such requests promptly, though it may take a few days to fully implement an opt-out across our systems.

Our Use of Cookies

Our website uses cookies. You can manage your cookie preferences at any time via the cookie consent banner on our website — see our separate Cookie Policy for full details.

Our Use of Analytics

We use Google Analytics and Google Tag Manager to understand how visitors use our website, so that we can improve it. This processing relies on your consent (via the cookie banner) or, for essential measurement, our legitimate interests.

Our Use of Targeted Advertising

We advertise our services using the following platforms:

- TikTok
- Google Analytics / Google Ads
- Meta (Facebook and Instagram)

These tools may use pseudonymised data (such as a hashed email address) to help deliver relevant advertising and to measure its effectiveness. You can opt out at any time by contacting info@rockwellfinancial.ie or via the relevant platform's own privacy controls.

Links to Other Websites and Third Parties

Our website may include links to social media platforms and other websites. If you follow a link to any of these platforms or websites, their own privacy policies will apply, and we do not accept responsibility or liability for those policies. Please check them before submitting any personal data.

Securing Your Data

Communication between your browser and our website uses a secure encrypted connection wherever your personal data is involved. We have put in place physical, electronic and managerial security procedures to protect your personal data against accidental loss, destruction or damage.

Any data transmission over the internet can never be guaranteed fully secure, and provision of personal data to us is at your own risk - however, we take all reasonable measures to protect it with appropriate technical and operational security. Where we disclose your data to trusted third parties, we require them to have appropriate security measures in place and work with them to ensure your data privacy rights are respected.

In the event of a personal data breach, we will notify you and any applicable data protection authority where we are legally required to do so.

Members Portal

Our client Members Portal (accessible via 'Members Login') is a separate, secure platform used by existing clients to view their financial information. Personal data processed through the Members Portal is covered by a separate Privacy Notice specific to that platform, available on request or within the portal itself.

Retaining Your Data

We do not keep personal data for longer than necessary. As a firm regulated by the Central Bank of Ireland:

- Client records are generally retained for 6 years after the end of our relationship with you, in line with the Consumer Protection Code
- Anti-money laundering (AML) records are retained for a minimum of 5 years, as required by the Criminal Justice (Money Laundering and Terrorist Financing) Act

Where we are legally required to retain data, we cannot action an early erasure request for that data — see 'Your Rights' below.

Transferring Your Data Outside the EEA

Where your personal data is transferred outside the European Economic Area (EEA), we ensure this is done on the basis of an EU adequacy decision, or by using Standard Contractual Clauses approved under the GDPR. Contact us for further information on international transfers.

Your Rights

Subject to certain conditions, you have the right to:

- Be informed about how your data is processed
- Access the personal data we hold about you
- Have inaccurate data corrected, or incomplete data completed
- Request erasure of your data, where we do not have a legal obligation to retain it
- Request restriction of, or object to, certain processing
- Request portability of data you have provided to us
- Withdraw consent at any time, where consent is our legal basis for processing
- Complain to the Data Protection Commission (www.dataprotection.ie) if you are unhappy with how we handle your data

To exercise any of these rights, contact us at info@rockwellfinancial.ie. There is no charge for exercising your rights, and we will respond within one month.

Changes to This Notice

We may update this Notice from time to time to reflect changes in how we process data or in the law. Significant changes will be highlighted on our website.

How to Contact Us

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