

Data Privacy Statement

Effective 25th May 2018

WHO WE ARE

Simon Hinchey t/a Investment Retirement Life & Pension Advisors with registered offices at 40 Lagavooren Manor, Drogheda, Co. Louth, A92K0NN. At Simon Hinchey t/a Investment Retirement Life & Pension Advisors are here to help our clients gain greater confidence for the future by developing a clear strategy for their financial planning. We will take the time to get to know you as a client and gain a full understanding of your life objectives, current situation and attitude to risk. We will then analyse your financial needs, make recommendations and implement solutions for you. We specialise in life insurance, income protection, retirement planning and more.

WHAT IS A DATA PRIVACY NOTICE & WHY IS IT IMPORTANT?

We are fully aware of how important your personal information is and as such our Data Privacy Notice tells you what we use your personal information for and explains your rights about how we use it. Please read this Data Privacy Notice to understand how and why we use your personal information. If you give us personal information about someone else, please make sure you have their permission and make them aware of this Data Privacy Notice.

WHAT INFORMATION WE COLLECT AND WHY (OUR LEGAL BASES FOR PROCESSING)

We use personal information to advise you about products and services we offer and to administer these policies should you decide to use our services. We must have a lawful basis to collect and use personal information. These legal bases are explained below: Necessary for the performance of a contract: We need to collect and use your personal information to arrange a policy through the an insurer who underwrites any policy you choose. The information collected includes, but is not limited to, your name, date of birth and contact details. Depending on the policy type this can include health, employment, pension and salary information. We restrict access to, and the use of, special categories of data and other sensitive personal information. The personal information needed for policy contracts is held and used to:

- verify your identity and to verify the accuracy of the information we receive about you
- assess the information you have provided, and make a decision as to whether we can provide you with cover through the relevant insurer
- provide you with a quotation for an insurance product and to arrange for the provision of specific insurance cover should you decide to purchase a product through us.
- share your personal information with the relevant insurer to ensure that you have the appropriate cover in place.
- provide you with information about your policy.
- provide customer care and service –respond to queries, provide updates or process a cancellation.
- contact you to inform you of any relevant actions you may need to take.
- store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.
- assist you in the making of a claim through the relevant insurer.

Required by law:

Below is how we use your personal information to comply with all relevant laws and regulations:

- For the provision of financial advice, you must give personal and financial information for your current and future needs to be assessed. This allows us to recommend the most suitable financial product for you. This also involves creating new personal information about you. We are required to complete this analysis of you, using your personal information, in order to comply with regulations, reporting to regulators, keeping proper books and records, to manage and investigate any complaints.

- We must collect certain personal information to comply with Anti-Money Laundering law. This depends on your policy type and may include:
 - up to date proof of identification and address. When you give us your personal information we will check to see if we already have a record of you. This helps us to comply with your Data Protection rights.

Call Recording:

We let you know if a call is being recorded at the start of the call so you can decide whether to continue or not.

Where you have requested information about a Product or Service

We will contact you about the products or service that you have requested.

Consent

You need to give consent for us to collect and use personal information classed as sensitive or for certain uses of your personal information. You are given the choice to provide consent, or not. When we collect your consent, we will explain what we need it for and how you can change your mind in the future.:

Direct Marketing:

We will only send you direct marketing content where we have your consent. Your information will not be passed on to third parties for the purposes of direct marketing.

CONSENT AND HOW TO WITHDRAW CONSENT?

If we process your personal information based on consent, you have the right to withdraw that consent at any time. The opt-out methods will depend on how the consent was collected and will be explained when you give us your consent.

You can change your mind using the opt-out link in any direct marketing emails sent to you. By writing to: Simon Hinchey t/a Investment Retirement Life & Pension Advisors, 40 Lagavoreen Manor, Drogheda, Co. Louth. By emailing: simon@irlpension.ie By telephoning: 0429780831.

AUTOMATED DECISION MAKING INCLUDING PROFILING

The relevant insurer for your policy may use automated decision making in the calculation of premiums or during the underwriting process in order to provide you with cover. Please refer to the relevant insurer's Data Privacy Notice for more information in relation to this. Where any automated decision making used by the insurer produces legal effects for you or otherwise significantly affects you, you will have the right to obtain human intervention and to contest and make representations in relation to the decision in question.

HOW AND WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?

You provide us with your personal information directly when you contact us, complete our forms, speak with us or visit our website.

Our website - We do not store information about you regarding the use of our website.

WHO DO WE PASS YOUR PERSONAL INFORMATION TO?

We pass personal information to:

Insurers: We share your personal information with the relevant insurer(s) to provide you with quotations, to process your applications, to ensure that you have the appropriate cover in place and to process claims where relevant.

Data Processors: We share your personal information with companies that act as service providers under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used by other parties for any other reason. The categories of services that we use other Data Processors for include: document management and disposal, to facilitate the application process for cover, customer services and marketing.

Trustees: We share your personal data with appointed trustees in connection with the policy contract.

Regulators and other official agencies: Regulators, an Garda Síochána, the Revenue Commissioners, other official agencies or as needed to comply with regulations and laws and on foot of a Court Order or Subpoena.

HOW LONG DO WE KEEP PERSONAL DATA FOR?

We keep and use your personal information for as long as you have a policy contract through us. We also hold it after your relationship ends with us for as long as we have to under regulations.

Information provided by you for a financial health check, where there is no associated sale of a financial product, will be retained for as long as necessary in order to ensure compliance with the requirements of the Consumer Protection Code 2012. After the periods set out above, we will delete the personal data.

WHAT ARE YOUR RIGHTS?

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details at the bottom of page 5 of this Data Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month. This period may be extended for a further 2 months. If we need this extra time to deal with your request, we will notify you of the fact that there will be a delay and the reasons for it within a month of your request being made. Likewise, if we have reason to refuse your request, we will notify you within a month of the refusal and the reason for it.

Right to Information

You have a right to the information set out in this Data Privacy Notice. We will inform you of our updated Data Privacy Notice, if we change the type of personal information we collect and / or how

we use it. We have controls in place to protect your personal information and minimise the risk of security breaches. However, should any breaches result in a high risk for you, we will inform you without delay.

Right to Restrict or Object

You can restrict or object to any unfair and unlawful collection or use of your personal information. You can object to any automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person. Where we state in this Data Privacy Notice that we process your personal data on the basis of a legitimate interest, you are entitled to object to the processing in question on grounds relating to your particular situation. We will then stop processing the personal data in question unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or unless we need to use it in relation to legal claims. Please note that if you object to us processing your data, we may not be able to provide certain services to you that would otherwise be entitled to under your insurance policy. You can withdraw consent and object to the processing of your personal data for direct marketing purposes.

Right to Correct and Update

You can ask us to correct and update personal information we hold about you. It is important we have your up to date personal information, such as contact details to provide you with the best service. Please ensure to advise us of any updates to your personal data.

Right to Delete and Be Forgotten

You can have your personal information deleted if it is incorrect or has been processed unfairly or unlawfully. If we have provided a regulated product or service to you, we must keep your personal information for a minimum period by law. If you have withdrawn consent you can ask for your personal information to be deleted unless it was provided for a regulated product or service.

Right to Portability

You can ask for a copy of all personal information that you gave us which is held by us. This is only in relation to personal data that we process on the legal basis of consent or for the purpose of entering or performing a contract and where the processing is carried out by automated means. You can receive this in a machine readable format. You may also request Simon Hinchey t/a Investment Retirement Life & Pension Advisors to send this personal information in a machine readable format to another company. The format will depend on our ability to provide this in a secure way that protects your personal information. We will not likely be able to use a copy of your personal information sent to us in this way from another company. This is because we can only collect personal information that we need. We also need your most up to date personal information to comply with regulations.

Right to Access

You have the right to know what personal information we hold about you and to receive a copy of your personal information. We must tell you: Why we hold it, who we pass it to, including whether we transfer it outside the EEA, how long we keep it for, where we got it from, and if we carried out any automated decisions, and if so, the logic behind these and what it means for you. This right does not allow you to access personal information about anyone else. To access your personal information please write to us using the contact details at the bottom of page 5 of this Data Privacy

Notice. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information.

HOW TO CONTACT US.

If you have any questions about your personal information and this Data Privacy Notice or if you wish to exercise any of your rights, please contact us at:

By Post -Simon Hinchey t/a Investment Retirement Life & Pension Advisors,40 Lagavooren Manor, Drogheda, Co. Louth, A92K0NN.

By emailing: simon@irlpension.ie .

By telephoning: 0429780831

COMPLAINTS

If you do not think that we have processed your personal information in line with this Data Privacy Notice, please contact us directly at:

By Post:Simon Hinchey t/a Investment Retirement Life & Pension Advisors, 40 Lagavooren Manor, Drogheda, Co. Louth, A92K0NN.

By emailing: simon@irlpension.ie .

By telephoning: 0429780831

If you are not happy with how we have processed your personal information or handled your privacy rights, you can complain to the Data Protection Commission by contacting them using the details below:

Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23

Telephone: +353(0)761 104800

LoCall: 1890 252231

Fax: +353 57 8684757

Email: info@dataprotection.ie

CHANGES TO OUR DATA PRIVACY NOTICE

We may update this Data Privacy Notice from time to time. Any changes will be published on this page www.irlpensions.ie

Contact Details

By Post: Simon Hinchey t/a Investment Retirement Life & Pension Advisors, 40 Lagavooren Manor, Drogheda, Co.Louth

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Tel: 0429780831 Email: info@irlpensions.ie Web: www.irlpensions.ie

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Simon Hinchey t/a Investment Retirement Life and Pensions Advisors is regulated by the Central Bank of Ireland