

Pension Freedom

Data Privacy Notice

Privacy Notice for Pension Freedom

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UPDATED: March 2020

This is the privacy notice of Pension Freedom and tells you what we use your personal information for and explains your rights around how we use it. Please read this 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 Privacy Notice, as it also applies to them.

Pension Freedom complies with the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018. Should you have any queries, please contact Gerard Keogh.

COLLECTION AND USE OF PERSONAL DATA

We use personal information to arrange transactions on your behalf as agreed with you, to service our customers, assist with claims and the payment of plan benefits. We must have a lawful basis to collect and use personal information.

❖ Needed for Your Contract:

We need to collect and use your personal information to provide your plan contract. This includes, but is not limited to, your name, date of birth, contact and bank account details. Depending on the plan type this can include health, employment, pensions and salary information. We restrict access to, and use of, any sensitive personal information. We also create new personal information.

Personal information needed for plan contracts is held and used to:

- process your application
- set up and issue your plan
- provide you with information about your plan
- to help the administration of your plan and assist with the payment of your plan benefits
- provide customer care and service, and
- contact you to inform you of any relevant actions you may need to take

❖ Required by Law:

We use your personal information to comply with law and regulations, such as:

- reporting to regulators
- keeping proper books and records, and

We carry out internal reporting, quality checking, compliance controls and audits to help meet these obligations.

We must collect certain personal information to comply with Anti-Money Laundering law. This depends on your plan type. To do this, we use your name, date of birth, address, nationality and occupation information, including but not limited to:

- Up to date proof of identification and address
- Screening of all customers against Financial Sanctions and Politically Exposed Persons (PEP) lists
- Where needed we carry out searches of publicly available information

You must give us your tax residence information and tax identification number for tax reporting with product producers. In order to give you information and updates on your plan, we use your plan and contact details.

We use our customer personal information, including yours, to identify the target market for our regulated services.

In order to receive financial advice from us, you must give personal and financial information for your current and future needs to be assessed. This enables us to recommend the most suitable financial product for you. This also involves creating new and assumed personal information about you. We complete an analysis of you using your personal information to comply with regulations. 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.

LEGITIMATE INTEREST

We use your personal information for our legitimate interests as shown below. This doesn't affect your privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions using the above contact details of this Privacy Notice.

❖ Statistical Analysis

- We combine and group personal information for analysis to help us understand our customers and develop better services for you
- We use summary information to help promote our services and products from our product providers

YOUR 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.

❖ Profiling:

- Direct Marketing:

- ▶ We would like to be able to contact you about offers and services from across our group of companies, separately from your plan communications. We will only send you direct marketing content where we have your consent. When you use our website, you can consent to third party advertising. This shows you our ads where you have visited our website before or visited other websites offering similar products and services.

- Sharing with Other Companies with whom we have business arrangements

- ▶ We believe it may help you if we know whether you have products and services provided by other companies or if other services may be of interest to you. We will use this to provide you with additional services with your consent.

- ❖ 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, e.g. you can change your mind using the opt-out link in any direct marketing emails sent to you. You will also be able to withdraw consent by contacting us directly.

- ❖ How and Where do we get your Personal Information

You provide us with your personal information directly when you contact us, complete our forms, speak with us or visit our website, and social media accounts. We also get personal information from solicitors, employers or regulators (where relevant). We also create new personal information about you based on information you have given us and through your interactions with us such as noting your online preferences.

WEBSITE PRIVACY POLICY

The Web Privacy Notice of Pension Freedom relates to our privacy practices in connection with our website. We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identifiable as such.

Pension Freedom respects the rights of users of our website and is committed to protecting your privacy under the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018, at all times. We will not collect any personal information (also referred to as personal data) about you on our website without your permission or otherwise in accordance with the Data Protection Act.

- ❖ Collection and Use of Personal Data

Except in relation to certain specific features of our website, you do not have to provide us with any personal information (or personal data) to use our website. However, where you elect to give us your personal data through our website via online feedback forms or web email then we will treat your personal information in accordance with this notice.

- ❖ Web Browsing

By simply visiting our website you do not disclose, nor do we collect, personal data on you. All that we may know about your visit may be limited to technical data such as;

- The logical address (or IP address) of the server you used to access this website
- The top-level domain name from which you access the internet (for example .ie, .com, .org, .net)
- The previous website address from which you reached us
- The type of web-browser you used
- Web traffic data (the amount of data sent and received by visitors to a web site. This is determined by the number of visitors and the number of pages they visit).

The technical data may be used for administrative and statistical purposes and may be shared with our internet service provider. We may use this information to help us to improve our website. This technical data does not provide us with the personal data of visitors to our website.

❖ Cookies

We do not use cookies. Should we decide to use cookies in the future, we will not do so to collect or store personal information without notifying you. [Note: You can change the settings on your browser to refuse all cookies. However, you should note that disabling cookies may result in some parts of the site not working efficiently or in slower downloads].

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. We use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.

However, if you do not accept cookies, you may not be able to use some portions of our services.

TO WHOM DO WE PASS YOUR PERSONAL INFORMATION

We pass personal information to:

- Data processors:

▶ 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. Our main Data Processors include Irish Life, Zurich Life,

Aviva, New Ireland and Royal London. The categories of services that we use other

Data Processors for include: document management, administration, underwriting, customer services, marketing, actuarial services, Financial Sanctions and PEP screening.

- Trustees:

▶ appointed in connection with the plan contract.

- Investment Service Providers:

▶ We pass limited personal information to investment service providers where you want to access these services through your plan e.g. Stockbroker or Online Trading Platform.

- Regulators:

► Regulators, such as the Central Bank, and the Revenue Commissioners or as needed to comply with regulations and laws.

- Other Companies:

► We pass your personal information to third parties, including other companies with whom we have a formal business arrangement, with your consent.

DO WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE OF THE EU?

Your personal information is processed and stored within the EU.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We keep and use your personal information for as long as you have a relationship with us. We also hold it after this where we need to for complaints handling, for system back-ups needed for disaster recovery and for as long as we have to under regulations. We will let you know how long we keep personal information for when you avail of a single or specific service such as a quote or call-back.

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 in this Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month in line with current regulations. Any restrictions to your rights will be explained in our response.

❖ **Right to Information:** You have a right to the information set out in this Privacy Notice. We will inform you of our updated 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. You can withdraw consent and object to, for example direct marketing.

❖ **Right to Correct and Update:** You can ask us to correct and update personal information we hold about you. Your plans are long term contracts and to provide you with the best service it is important we have your up to date personal information, such as contact details.

❖ **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 you have withdrawn consent you can ask for your personal information to be deleted. We will keep a record of your request so we know why your personal information was deleted. If we have provided a regulated product or service to you, we must keep your personal information for a minimum period by law.

❖ **Right to Portability:** You can ask for a copy of all personal information that you gave us (including through your interactions with us), and which we hold in an automated format. You can receive this in a machine-readable format that allows you to keep it. You may also request us 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 for underwriting and 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 EU
- ▶ 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 it 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 in this 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.

SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our services, to provide services on our behalf, to perform service-related services or to assist us in analysing how our services are used. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose in accordance with the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018.

BUSINESS

If Pension Freedom is involved in a merger, acquisition or asset sale, your Personal Information may be transferred.

We will provide notice before your Personal Information is transferred and becomes subject to a different Privacy Policy.

CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from children under 13. If you are a parent or guardian and you are aware that your children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children under age 13 without verification of parental consent, we take steps to remove that information from our servers.

FUTURE CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time, when necessary. We will notify you of any changes by posting the new Privacy Policy on our website.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on our website.

CONTACT US

If you have any questions about this Privacy Policy, please contact us at Pension Freedom, 6 The Close, Inse Bay, Laytown, Co. Meath, A92 X2A2.