



IRISH LIFE FINANCIAL SERVICES LTD PRIVACY NOTICE

1. WHAT IS A PRIVACY NOTICE & WHY IS IT IMPORTANT?

We know your personal information is important to you and it is important to us too. This Privacy Notice 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.

2. WHAT PERSONAL INFORMATION WE COLLECT AND WHY

We use personal information to give you financial planning advice and other separate services. If you ask us to provide financial advice, we will assess your financial needs and recommend financial solutions to help meet your identified needs. If we are the appointed financial adviser on any of your plans we will act as your intermediary for those plans. We must have a lawful basis to collect and use personal information. This is explained below:

REQUIRED BY LAW:

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

- reporting to regulators;
- keeping proper books and records.



We carry out internal reporting, quality checking, compliance controls and audits to help meet these obligations in relation to our regulated activities. We must collect certain personal information to comply with Anti-Money Laundering law. This depends on the type of service we offer you but includes up to date proof of identification and address information.

To give you financial advice we need personal and financial information about you and your dependents to assess your current and future needs. This will include information about your general state of health. We need this to make an appropriate financial recommendation for you. This will involve creating new and inferred personal information about you such as your investment risk profile. We must carry out this analysis using your personal information to comply with regulations.

As a regulated intermediary we must use your personal information to identify whether a financial product is suitable for you based on the product target market identified by the relevant product provider.

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. Please see section 8 of this Privacy Notice.

The type of personal information that is required by law may vary in the future and depends on the type of service we provide.

NEEDED FOR YOUR CONTRACT:

We use your personal information for the performance of contracted services. The terms and conditions of these services will be set out in your contract.

We will use your personal information to verify you in order to provide additional services such as mobile app services and to provide some or all of the features associated with that service.

LEGITIMATE INTEREST:

We use your personal information for our legitimate interests as shown below. This doesn't affect your privacy rights. We have taken account of any privacy risks and ensured that your data protection rights are not affected. We believe these uses benefit our customers. You can contact us if you have any questions using the details in section 9 of this Privacy Notice.

- **Call Recording:**
 - For customer service, we record and monitor calls. This includes Voice over IP (e.g. Skype) calls. We let you know if a call is being recorded at the start of the call so you can decide to continue or not.
- **Sharing with Product Providers:**
 - For financial advice and planning services, we will share some of your relevant personal information with product providers in order to obtain quotations and service your plans.
- **Statistical Analysis:**
 - We combine and group personal information for analysis to help us understand our customers and develop better services.
 - Personal information from other companies within the Irish Life Group may also be used for this purpose.
 - We use summary information to help promote our services.
- **Customer queries and service requests:**
 - When you send us a query or request a service, such as a call back, we will collect and use the personal details needed to respond to your request.
- **Customer verification with other companies in the Irish Life Group:**
 - We maintain a record of plans you hold with certain Irish Life Group companies using personal information such as your name and contact details in order to provide real-time access to certain services you agree to.

WITH YOUR CONSENT:

You need to give your consent for us to collect and use personal information classed as 'sensitive personal information' 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.



- **Financial Review:**
 - When availing of our services we will ask you to consent to the use of your personal information for those specific services, e.g. current and future Financial Reviews. This includes contacting you to arrange future financial reviews where we believe this is of benefit to you. We will need to collect personal information to provide this service including your name, date of birth and contact details. Depending on the type of advice you are looking for we will need financial information such as income, expenses, assets, occupation, health and information about your dependents.
- **Biometric Data:**
 - Where you have consented we will collect information to identify you through voice, facial or fingerprint recognition technology.
 - Where you have consented we will collect and process biometric, health and other related data to provide additional services such as mobile app services that help you track your health goals. We will specify what we will use this data for when we collect your consent.

- **Location Data:**

- Where you have consented we will collect and process location data through mobile apps that help track and record your activity. You will have the option to turn off location data through your mobile device.

- **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.

- **Cookies:**

- When you visit our website we will use cookies to tell us whether you have visited our website before. We also use cookies for third party advertising to show you Irish Life ads where you have visited our website before or visited other websites offering similar products and services. We will ask for your consent to use these once you visit our website.

- **Mobile App Software Development Kits (SDK):**

- When you register and use one of our mobile apps, we may use third-party software development kits ("SDKs") to collect information about how you are using the app. We use information on how you interact with the app to improve the usability of the app and to enable us to track the performance of our advertising. We will ask for your consent to use these when you register for one of our apps.

- **Sharing with Other Companies within the Irish Life Group:**

- If we wish to share your information with other Irish Life Group companies other than as set out elsewhere in section 2, we will explain why and seek your consent.

3. 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 consent e.g. you can change your mind using the opt-out link in any direct marketing emails sent to you or by opting out of a mobile app service.

You will also be able to withdraw consent by contacting us directly using the details in section 9 of this Privacy Notice.

If you have received advice from us and then choose to withdraw consent to the further use of personal information, we will not contact you in relation to future financial reviews. However, we are still required by law to hold details of past financial reviews for specific purposes and periods.

4. HOW AND WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?



You provide us with your personal information directly when you contact us, complete a financial review, speak with us or visit our website, social media accounts and mobile apps. For more information on what personal information is collected and used on our website please see the Website Privacy Policy and Cookies Policy at www.irishlife.ie

If we act as your appointed financial adviser, we will also get your plan and personal information from your product provider, generally Irish Life Assurance.

We also create new personal information about you based on the information you have given us and through your interactions with us, such as creating a profile of you and your potential financial needs.

We may receive your name and contact details from another regulated company so that we can offer you a Financial Review service, but only where you have agreed they can pass that information to us.

For some services such as mobile apps we will get your personal information from Irish Life Assurance and Irish Life Health.

5. WHO DO WE PASS YOUR PERSONAL INFORMATION TO?

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 are Irish Life Group Services Ltd. and Canada Life Group Services Ltd. The categories of services that we use other Data Processors for include: document management, administration, marketing and mobile app services.
- **Your Product Provider(s):**
 - If we act as your intermediary to service and advise on your plan(s).
- **Regulators:**
 - Regulatory bodies and agencies or as needed to comply with regulations and laws.
- **Other Companies:**
 - Third parties, including other companies within the Group, where we have a lawful basis to do so.



6. DO WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE OF THE EU?

Irish Life Financial Services (ILFS) process and store your personal information within the EU. However we do pass personal information securely to our parent company Great-West Lifeco in Canada. We do this for administration purposes for the recording of legal claims. Passing your personal information to certain countries, including Canada, is allowed under an adequacy decision made by the European Commission.

Where we, or our data processors, transfer your personal information outside the EU, we will take steps to ensure that your personal information is adequately protected and transferred in line with data protection law.

We process and store data in the UK, which at the date of drafting, is within the EU. Should the UK leave the EU, we are likely to continue to process and store data in the UK either in line with any agreement reached between the UK and the EU for such process and storing, or under other available legal means permissible for transfer to non-EU countries.



7. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?



We keep and use your personal information for as long as you are a customer of ILFS. We also hold it after this where we need to for complaints handling, for system back-ups and for as long as we have to under regulations.

If you have purchased a financial product based on our Financial Review recommendation to you, we will keep that Financial Review information for as long as you keep that product.

If you have registered for one of our mobile apps we will keep and use your personal information for as long as you are an active user of the mobile app.

We will let you know how long we keep personal information for when you avail of a single or specific service such as a call-back on our website.

8. 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 section 9 of this Privacy Notice. You will need to give us information to identify you and we will respond to you within one month in line with regulation. 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. The most recent version of our Privacy Notice will always be accessible on our website at <https://www.irishlife.ie/ilfs-privacy-notice>. If we make changes to the type of personal information we collect and / or how we use it, we will inform you of the changes.

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

- **Right to Restrict or Object**

You can restrict or object to any unfair and unlawful collection or use of your personal information.

As above you have the right to 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.

It is important that we have your up to date personal and financial information for us to give you the most appropriate advice, including ongoing advice that takes account of your changing needs.

- **Right to Delete and Be Forgotten**

You can have your personal information deleted if it is incorrect, if it is no longer needed 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 service for 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 ILFS 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.

It is not likely that we will 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 give you the most appropriate advice 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;
- 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 access personal information about anyone else.

To access your personal information please write to us or email us using the contact details in section 9 of 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.

9. HOW TO CONTACT US

You can contact with any questions about your personal information and this privacy notice:

Address: Irish Life Financial Services
Irish Life Centre,
Lower Abbey Street,
Dublin 1

Telephone: +353(0)1 704 1010

Email: dataprotectionqueries@irishlife.ie

Website: www.irishlife.ie



10. DATA PROTECTION OFFICER

Irish Life Financial Services also has a Data Protection Officer who you can contact directly:

Address: Data Protection Officer
Irish Life Financial Services
Irish Life Centre,
Lower Abbey Street,
Dublin 1

Telephone: +353(0)1 704 1969

Email: ILFSDPO@irishlife.ie



11. COMPLAINTS

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

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 using the contact details below:

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

Telephone: +353(0761)104800

LoCall: 1890 252231

Fax: +353 57 8684757

Email: info@dataprotection.ie

This Privacy Notice is effective from April 2019.

Irish Life Financial Services Limited is regulated by the Central Bank of Ireland.

Some additional services such as mobile apps not related to providing financial planning or advice are not regulated services.

Irish Life Financial Services Limited is tied to Irish Life Assurance plc for life and pensions.
