



OUR PRIVACY STATEMENT

WHO WE ARE

Chartered Financial Solutions Ltd (CFS) is a life and pensions brokerage that provides professional financial advice in the areas of pensions, savings and investments, life and illness cover.

We appreciate that your personal information is important to you. We are dedicated to protecting your personal data and respecting your privacy. It is the intention of this privacy statement to explain to you our procedures in relation to the personal details we collect about you, the reasons for collecting and processing this information, who we may share it with and your rights under the European Union's General Data Protection Regulations (GDPR).

WHAT PERSONAL INFORMATION WE COLLECT AND WHY

We will only collect personal data where it is required for a legitimate purpose. Your personal data will only be collected and processed to accurately identify your needs and to allow us to provide financial advice and arrange financial products where appropriate. We will only gather adequate information to allow us to advise you appropriately.

The personal information we collect includes, and is not limited to, the following;

- Personal details such as your name, address, gender, date of birth, PPS number, marital status, occupation, email address, attitude to risk, mobile and home telephone numbers.
- Health information and family history details.
- Financial details such as salary, P60, bank account information, employment details, assets, liabilities, household expenditure.
- Information to comply with Anti-Money Laundering law, such as proof of your PPS number, photo ID and proof of your address.
- Information that is automatically collected via cookies when you visit our website.
- Information that is disclosed to us through meetings, phone calls, emails and letters.
- Information that is provided to us by third parties such as accountants, solicitors and other financial institutions.

This information is typically collected via our fact finding process, telephone calls, letters and emails, product application forms and ongoing review meetings.

CFS do not advise on or provide products to children. However, there are certain products that a parent, guardian or other family member may establish on behalf of their children or

where the child is named as the beneficiary or the life assured. In these cases, it is necessary to collect some personal information to identify the child, including their name, date of birth, contact details and their relationship to the policy owner.

YOUR CONSENT AND HOW TO WITHDRAW CONSENT

We are required to gather certain personal details in order to be able to advise you appropriately. Failure to provide certain personal information means that, as we do not have the relevant information to assess whether a product or service is suitable for you, we will not be in a position to recommend and arrange the product or service for you. This suitability requirement is governed by the Consumer Protection Code, 2012.

If we process your personal information based on your consent, you have the right to withdraw this consent at any time.

HOW WILL WE USE THE PERSONAL DATA WE COLLECT ABOUT YOU?

Your data is obtained and stored to provide our ongoing services to you. This is to ensure that we are in a position to provide products and services that are appropriate to your personal circumstances. This includes the arrangement of specific products and the provision of financial planning advice.

CFS will collect, store and process the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than necessary.

HOW LONG WILL WE HOLD YOUR PERSONAL DATA?

We keep and use your personal information for as long as you are a customer of ours. We are required to retain information in accordance with the Central Bank's Consumer Protection Code, 2012 for specific periods of time. As a general rule, your data will be retained for six years after the termination of the client relationship or after your policy has ceased. In accordance with the Central Bank and Financial Services Authority of Ireland (Amendment) Act passed into law on the 25th July 2017, we reserve the right to retain client data in excess of this period. Our Data Retention and Deletion Policy gives a comprehensive overview of the governing regulations surrounding the retention of data. A copy of this policy is available on request.

UNDER WHAT CIRCUMSTANCES WILL CFS CONTACT ME?

We will contact you to fulfil our contractual obligations under the guidelines of the Consumer Protection Code, 2012. This might include, but is not limited to, policy renewals, maturities, benefit payments, claims, alterations or regular financial reviews.

We will only send you direct marketing content where we have your explicit consent. Should you opt-in to our occasional email updates, you have the option to unsubscribe at any time.

WHO ARE WE SHARING YOUR DATA WITH?

We securely pass personal information, including personal health information if necessary, to:

- Your authorised representatives
- Insurance companies and product providers
- Stockbrokers and banks
- Statutory and regulatory bodies
- Other regulated intermediaries
- Professional services providers such as accountants and solicitors
- Financial planning software and CRM providers
- Pension fund administrators and pension scheme trustees

Any third parties with whom we may share your data are also governed by the GDPR and are obliged to keep your details securely, and to use them only to fulfil the service they provide on your behalf.

DO WE TRANSFER YOUR DATA OUTSIDE THE EU?

Your personal information is processed and stored within the EU. However, we may pass data outside of the EU in certain circumstances, for example providing contract data to a parent company outside of the EU. Passing your personal data to certain countries is allowed under an adequacy decision made by the European Commission.

THE SECURITY OF YOUR DATA

The security of your data is of paramount importance to us. Your data is stored on a secure server in our offices and is backed up remotely on a daily basis to two secure geographical locations in Ireland. This is done via AES 256-bit encryption on our servers and during transport over the internet. Automatic updates and security patches are provided as part of our IT provider's service level agreement. Both locations are protected by 24 hour monitored alarms, smoke detection and surveillance controlled access to each premises. All our mobile devices are fully encrypted.

WHAT ARE YOUR RIGHTS?

We are committed to facilitating your rights in line with the GDPR. At any point while we are in possession of or processing your personal data, you have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you. Should you wish to exercise this right, please email info@cfsireland.com with your request. This request is free of charge and we will respond to you within one month in line with regulation.
- **Right of rectification** – you have a right to correct data that we hold about you that may be inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records. Please note that if we have arranged a regulated product or service for you, we must keep your personal information for a minimum period by law.

- **Right to restriction or object** – you have the right to restrict or object to any unfair and unlawful collection or processing of your personal data. You can also object to direct marketing and any automated profiling and decision making.
- **Right of portability** – you can ask for us to send a copy of the personal information you have provided to us to another organisation or services provider.
- **Right to judicial review** - in the event that we refuse your request under rights of access, we will provide you with a reason as to why.
- **Right to withdraw consent at any time** – if we process your personal information based on consent, you have the option to withdraw this consent at any time by contacting us.

Should you wish to exercise any of your rights, please contact us. If you are unhappy with how your personal information has been processed, you have the right to complain to the Data Protection Commissioner, whose details are as follows;

Data Protection Commissioner
 Canal House
 Station Road
 Portarlinton
 Co Laois

Tel: +353 761 104 800
 Email: info@dataprotection.ie
 Web: www.dataprotection.ie

UPDATES

We may change this privacy statement from time to time. When and if such a change is made, an updated version of the statement will be available on our website. It is your responsibility to review this statement periodically so you are aware of any changes. By using our services you agree to this privacy statement.

HOW TO CONTACT US

If you have any queries about this statement, please do not hesitate to contact us as follows

Chartered Financial Solutions Ltd
Trinity House
Charleston Road
Ranelagh
Dublin 6

Tel: +353 1 497 2133
Email: info@cfsireland.com
Web: www.cfsireland.com

This privacy statement is effective from 25 May 2018.

Chartered Financial Solutions Ltd is regulated by the Central Bank of Ireland.