

INTRODUCTION - CONEXIM APPROACH TO DATA PRIVACY

Conexim is a market leading open architecture Investment Platform, providing a range of investment solutions to the intermediary market and whose offering is available through Financial Advisors, Accountancy Firms and Pensioner Trustees. Conexim is a member of the Irish Life Group of companies, and a subsidiary of Great-West LifeCo Inc who are one of the world's leading life assurance organisations.

In order to provide clients, intermediaries, Trustees, and other market participants with our services, Conexim is required to control personal data for clients, intermediaries, and other parties with whom we provide services to or receive services from.

Conexim is committed to protecting and respecting your privacy. Conexim has adopted the principle of **Privacy by Design** and has reviewed and appropriately modified our business processes to comply with this element of the GDPR.

We will ensure that the definition and planning of all new or significantly changed methods for collecting or otherwise processing personal data will be subject to due consideration of privacy issues, including the completion of data protection impact assessments, where necessary.

The use of techniques such as data minimisation and pseudonymisation will be considered where applicable and appropriate.

THIS PRIVACY NOTICE

This privacy notice explains when and why Conexim collects personal information, how it is used, the condition under which it may be disclosed to other and how it is kept secure.

Conexim may amend this privacy notice from time to time and unless there is a material change will not provide prior notification and will update this on its website and client access portals. If a material change is made to this privacy notice, clients who receive services from us will be informed via their client portal. Continued use of our services following any such changes constitutes your acknowledgment and acceptance of those amendments and your agreement to be bound by them.

WHAT PERSONAL INFORMATION FOR CLIENTS DO WE COLLECT AND WHY?

Primarily, we collect personal information only to provide you with services, and to comply with relevant regulations and laws, including internal operating procedures and compliance checks.

The **consent** for the **lawful basis** for controlling and processing your personal information is given when you **apply for an account at Conexim**, and enter into a contract with use to provide you with services.

We also have a **legal obligation** to control and process your personal information to comply with Central Bank of Ireland regulations and Revenue obligations, for which you also give consent when you apply for an account at Conexim.

We process personal data where this is necessary to enter into or perform our contract with you, to comply with our legal and regulatory obligations, for our legitimate interests where these are not overridden by your rights and interests, or, where appropriate, on the basis of your consent.

Where we rely on consent for a particular processing activity, you may withdraw that consent at any time. This will not affect the lawfulness of processing carried out before consent was withdrawn.

We may obtain personal data directly from you and from other sources, including your financial intermediary, trustee or authorised representative, Pershing and other service providers involved in operating your account, identity verification and financial crime screening providers, public registers and publicly available sources, and regulatory or public authorities where permitted by law.

Where personal data is required to enter into or perform our contract with you or to comply with a legal or regulatory obligation, failure to provide the required information may mean that we cannot open or operate your account, process a transaction or provide the relevant service.

Conexim does not market its services to the general public as it operates only through intermediaries. Therefore, we will not contact you for marketing purposes, and contact is restricted to that required for us to service your account.

The reasons and types of data we collect is summarised overleaf, along with the primary parties who provide services to us in relation to that data as data processors. Please note that some parties may use sub-processors that are not listed below.

Why we collect information from Clients	What information we collect and control	How information is processed	Lawful basis for processing	Systems/Sub-Processors Used
To meet regulatory requirements to establish identity and provide services with Pershing under MiFID for execution only clients.	Information verifying identity for retail clients for non- complex products as well as occupation, financial situation, pension details, banking information.	Application form received electronically or in physical form, scanned and stored on internal network and transposed into Pershing systems. Information used in internal analysis for reconciliations.	Article 6(1)(c), legal obligation: for identity regulatory and record keeping requirements. Article 6(1)(b), Performance of contract, for processing necessary information in order to open and operate client accounts.	Paper Filling Internal Network Storage Microsoft 365 Pershing Nexus FTP Servers KnowYourCustomer Finscan MyConexim Canada Life Group Services (IT Services)
To meet regulatory requirements to establish identify and provide services with Pershing under MiFID II for advisory or discretionary clients.	As above but with additional information on investment objectives, financial situation, personal circumstances Incl. dependents and knowledge, skill, experience.	Application form and associated documents stored on internal network.	Article 6(1)(c), legal obligation; as the primary basis for suitability, client categorisation and regulatory documentation; Article 6(1)(b), Performance of contract, where necessary to provide the advisory or portfolio-management.	Paper Filling Internal Network Storage Microsoft 365 Canada Life Group Services (IT Services)
To facilitate client reporting.	Email addresses and postal addresses.	Information transposed into internal systems and Pershing systems. Where an intermediary who is advising you on your account requires data to perform their duties, we may pass data back to that intermediary.	Article 6(1)(b), Performance of contract, in order to facilitate reporting information to clients in relation to their account including statements valuation reports and other relevant information. 6(1)(f), legitimate interests, in order to provide relevant information to the clients appointed third party financial advisor.	Paper Filling Internal Network Storage Pershing Nexus FTP Server to provide data to intermediary systems MyConexim Portus Canada Life Group Services (IT Services)

Why we collect information from Clients	What information we collect and control	How information is processed	Lawful basis for processing	Systems/Sub-Processors Used
To satisfy Anti-Money Laundering and Counter Terrorist Financing Legislation.	Address details, utility, bank statement, photo ID, extracts of RBO and CRO submissions where applicable.	Scanned and stored on internal network and transposed into KnowYourCustomer AML system.	Article 6(1)(c), Legal obligation: Processing of identity documentation, proof of address and photo identification is necessary to meet AML/CTF obligations.	Internal Network Storage Microsoft 365 KnowYourCustomer Finscan Search4Less Companies Registration Office (CRO) Canada Life Group Services (IT Services)
To Facilitate Revenue Reporting (under Transaction Reporting obligations).	Tax identification Numbers including Foreign Tax identification numbers.	Information transposed into Pershing systems and uploaded to Revenue systems.	Article 6(1)(c), Legal obligation: Processing and disclosure to revenue is necessary to meet statutory tax and transactional reporting requirements.	Paper Filing Internal Network Storage Sage Payroll Software (ARFs) Revenue ROS System Revenue MyEnquiries System Canada Life Group Services (IT Services)
To facilitate Central Bank reporting (under Transaction Reporting obligations).	National identification numbers (including passports, Tax IDs, national insurance numbers, etc.).	Information transposed into Pershing systems and uploaded to Central Bank systems.	Article 6(1)(c), Legal obligation: Processing of information for the purposes of transaction reporting is necessary for compliance for transaction reporting obligations.	Internal Network Storage Microsoft 365 Euronext Direct MyConexim Central Bank ONR System Central Bank Portal Canada Life Group Services (IT Services)
Call recording to facilitate dispute resolution, clarification of information and for inspection criteria .	Recording of inbound and outbound calls made through the central line.	Stored on a searchable database by phone number and date and internal extension.	Article 6(1)(c), Legal obligation: call recording is required to full obligations outline under MiFID II telephone recording rules. Article 6(1)(f), legitimate interests, for calls outside MiFID II telephone recording rules requirement, where recording is necessary to evidence instructions, manage complaints and disputes, protect legal claims, or assure service quality.	Genesys cloud Canada Life Group Services (IT Services)

In particular, it is worth noting that our services are provided under a Model B agreement with **Pershing Securities International Limited**, where Pershing provide you with custody, clearing, settlement and in some cases, execution services. When you enter an agreement with Conexim for services you also enter into an agreement with Pershing to provide you with those services as detailed more fully in our General Terms of Business. Under this model, Conexim routinely provide elements of your personal information to Pershing to enable the services to be provided. Further information on Pershing Privacy Statement may be found on www.pershing.ie

Where we collect information for joint accounts or for accounts where you have provided information on others (e.g. acting under deed of trust or in a nominee capacity), this policy applies to the person you are acting as agent for, in line with our General Terms of Business.

WHAT PERSONAL INFORMATION FOR INTERMEDIARIES DO WE COLLECT AND WHY?

Primarily we collect information only to establish and maintain and monitor business relationships, and to ensure intermediaries and the clients are linked appropriately in our systems. The reasons and types of data we collect is summarised below.

Why we collect information	What information we collect and control	How is information processed	Lawful basis for processing	Systems Used
To enter into agreements with intermediaries to introduce clients to us to receive and transmit orders, and in certain cases, to provide discretionary dealing services or other services to our clients.	Basic information verifying regulatory status, information on controlling persons authorised signatories and banking details for payments of commissions collected on their behalf.	Application form received electronically or in physical form, scanned and stored on internal network and transposed into Pershing systems. Information used in internal analysis for reconciliations.	Article 6(1)(b), steps before entering into and performance of a contract, for information necessary to assess, enter into and administer the agency/intermediary agreement. Article 6(1)(c), legal obligation, where regulatory-status checks, authorised-signatory checks or record keeping are specifically required under applicable law. Article 6(1)(f), legitimate interests, for necessary relationship management, reconciliation and operational or regulatory-risk management not required for the contract or by law.	Paper Filling Microsoft365 Internal Network Storage Email Systems Pershing Systems FTP Servers MyConeximCanada Life Group Services (IT Services) Genesys Cloud
Call Recording to facilitate dispute resolution, clarification of information and for inspection criteria.	Recording of inbound and outbound calls made through the central line.	Stored on a searchable database by phone number and date and internal extension.	Article 6(1)(c), Legal obligation: call recording is required to fulfil obligations outlined under MiFID II telephone recording rules. Article 6(1)(f), legitimate interests, for calls outside MiFID II telephone recording rules requirements, where recording is necessary to evidence instructions, manage complaints and disputes, protect legal claims, or assure service quality.	Genesys Cloud Canada Life Group Services (IT Services)
To collect management information on business relationships.	Name, Firm name, and email address.		Article 6(1)(f), legitimate interests: for maintaining communication and relationships with third party financial advisor.	Internal Network Storage Microsoft365 MyConexim Canada Life Group Services (IT Services)
To provide information on our services, events and performance and to maintain a business relationship.	Name, Firm name, and email address.	Stored in a database and used for provision of information.	Article 6(1)(f), legitimate interests: to provide third party financial advisor with relevant information relating to Conexim including events and services.	Internal Network Storage Microsoft365 Mailchimp Floktu
To maintain a database of intermediary details and engagement as part of a business relationship.	Name, Firm name and email addresses, details of business interactions.	Stored in a database and used for management information purposes, and for provision of aggregated holdings or trading data to be provided to 3rd parties (in aggregated format only).	Article 6(1)(f), legitimate interests: for maintaining communication and relationships with third party financial advisor.	Internal Network Storage Microsoft365 MyConexim Canada Life Group Services (IT Services)

WHAT ARE YOUR RIGHTS AROUND DATA?

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the contact 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 regulation. Any restrictions to your rights will be explained in our response.

RIGHT TO BE INFORMED

You have the right to be informed about how Conexim collects and uses your personal data. This is typically contained in the same forms that we request data from you so is implicit when you provide the forms to us that we are collecting that information. If we acquire data on you from other sources, you have the right to be informed of what data we have collected for you from other sources.

RIGHT TO ACCESS INFORMATION WE HOLD FOR YOU

You have the right to access the information we hold for you by providing a data access request. This will detail why we hold it, who we pass it to, where we got it from, whether we carried out any automated decisions using this data, whether we transfer it outside of the EU, how long we keep it for.

RIGHT TO BE INFORMED OF MATERIAL BREACHES

We have controls in place to protect your personal information and minimise the risk of security breaches. However, should any material breaches occur, or a breach that results in a high risk for you in terms of loss of protection in relation to your personal information, we will inform you without undue delay, along with making the relevant regulatory reports.

RIGHT TO RECTIFICATION

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.

RIGHT TO ERASURE

If we have provided a regulated product or service to you, we must keep your personal information for a minimum period required by law or regulation. You may ask us to erase your personal data in certain circumstances. This right is not absolute and we may retain information where this remains necessary to comply with legal or regulatory obligations, establish, exercise or defend legal claims, or otherwise as permitted by law.

We will keep a record of your request, so we know why your personal information was deleted.

RIGHT TO DATA PORTABILITY

The right to data portability applies in certain circumstances where processing is based on consent or contract and is carried out by automated means. You can ask for a copy of personal information that you gave us (including through your interactions with us), and which we hold in an automated and machine readable format. You may also request us to send this personal information in a machine readable format to another company, where possible, and where both parties have the ability to exchange data in this manner.

RIGHT TO RESTRICT PROCESSING OR OBJECT TO PROCESSING

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.

HOW DO WE ENSURE THAT DATA IS UP TO DATE AND ACCURATE?

We periodically request clients to confirm their details to us. Should you become aware that your data is not up to date or is inaccurate, please inform us as soon as possible so we can rectify this.

HOW LONG DO WE HOLD PERSONAL INFORMATION FOR?

We retain personal data for as long as necessary for the purposes for which it was collected and in accordance with applicable legal and regulatory retention requirements. Retention periods vary depending on the type of information concerned, the purpose for which it is held, the duration of the client or intermediary relationship and any applicable legal, regulatory, complaint, investigation or legal-claims requirements. Personal data will be deleted or anonymised when it is no longer required.

HOW DO WE TRANSFER DATA OUTSIDE OF THE EU?

Your personal information is processed and stored 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. When we do certain secure transfers these files temporarily reside on Canadian servers owned by Great West Life Co. Passing your personal information to certain countries including Canada, is allowed under an adequacy decision made by the European Commission.

Passing your personal information to certain countries, is allowed under Article 49(1)(b) of the General Data Protection Regulation which states *"the transfer is necessary for the performance of a contract between the data subject and the controller, or the implementation of pre-contractual measures taken at the data subject's request"*.

Where we, or our data processors, transfer your personal data outside the EEA, we will take steps to ensure that your personal information is adequately protected and transferred in line with data protection law. Any potential transfers of personal data outside the EU will be carefully reviewed prior to the transfer taking place. This is so that we can ascertain that the receiving third country falls within the limits imposed by the GDPR and that they have appropriate safeguards in place in relation to privacy and personal data protection.

SHARING OF YOUR PERSONAL DATA

Your personal data will be handled in strict confidence. However, where necessary in connection with your Conexim account(s), it may be shared with:

- Pershing and other custody/execution/settlement providers;
- the client's financial intermediary/adviser, trustee or authorised representative;
- identity verification, AML, sanctions and fraud-prevention providers;
- IT, cloud, communications and operational service providers;
- relevant Canada Life Group companies/shared-service providers;
- professional advisers/auditors; and
- the Central Bank, Revenue, Data Protection Commission, FSPO, law enforcement, courts and other authorities where disclosure is required or permitted.

Your PPS number is your Personal Public Service Number. It is a unique identifier for use in transactions with public bodies such as the Revenue Commissioners and the Pensions Authority and is used by Conexim for this purpose.

HOW TO CONTACT CONEXIM IN RELATION TO DATA PRIVACY ISSUES?

You can contact compliance@conexim.ie in relation to data privacy in Conexim, or phone **+353 1 6798080**, or write to us at **Data Privacy, Level 8 The, Irish Life Building, Abbey Street Lower, North City, Dublin 1, D01 PK03, Ireland.**

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 info@dataprotection.ie, by phone at **+353 (0)1 765 01 00 (LoCall 1800 437 737)**, or by post to: **Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963, Ireland.**