

# Privacy Notice

## My Life Planner provided jointly by Irish Life Assurance plc, Irish Life Financial Services Ltd and Irish Life Health DAC.

Irish Life in this notice means Irish Life Assurance plc, Irish Life Health DAC and Irish Life Financial Services Ltd who collect personal data in the My Life Planner on a joint controller basis. Further details of these three companies are set out in **Section 9** of this notice.

### 1. What is a privacy notice and why is it important?

We know your personal information is important to you and it is important to us too. Please read this Privacy Notice to understand how and why Irish Life uses the personal information you provide.

Within this My Life Planner you have the option to enter personal data which is collected to provide you with a My Life Planner Report. This information includes, but is not limited to:

- Name, Age, contact phone number, email address
- Number of dependents
- Employment status
- Current financial status
- Current insurance products held

We only retain this information where you share or email your report, or request a call back.

### 2. What personal information is collected and why?

We use personal information to provide the My Life Planner report and where you request it, a call back from one of the Irish Life companies. We must have a lawful basis to collect and use personal information. This is explained below:

#### Legitimate interest:

We may 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. You can contact us if you have any questions using the details in **Section 8** of this Privacy Notice.

#### Request a call back:

Where you request a call back your personal information will be used to respond to your request.

#### Statistical analysis and metrics:

We perform data analytics to better understand how users engage and interact with the My Life Planner services. This will include tracking users to policies subsequently taken out with Irish Life companies.

#### With your consent:

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.

**Cookies:**

We need your consent to collect personal data through the use of cookies when you visit our website. Cookies are small files of information that save and retrieve information about your visit. Please read our [cookies policy](#) for further information on this.

### **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 8** of this Privacy Notice.

### **4. Who do we share your personal information with?**

We pass personal information to data processors that act as service providers under contract with us and only process and store your personal information as instructed by us.

### **5. Do we transfer your personal data outside of the European Union (EU)?**

Your personal information is mainly processed and stored within the EU. 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.

### **6. How long do we keep your personal data?**

We retain your personal data that you provided in the My Life Planner for no longer than 12 months.

### **7. What are your rights?**

You have a number of rights over your personal data which you can exercise free of charge by contacting us using the details in **Section 9** of this Data Privacy Notice. You will need to give us

information to identify you and we will respond to you within one month. 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 Data Privacy Notice. The most recent version of our Data Privacy Notice will always be accessible on our website. If we change the type of personal data we collect and/or how we use it, we will inform you of the changes.

We have controls in place to protect your personal data and minimise 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 data. As explained above you have the right to withdraw consent and object to certain processing, for example direct marketing. You have the right not to be subject to automated decision-making including profiling.

### **Right to Correct and Update**

You can ask us to correct and update personal data we hold about you.

### **Right to Delete and Be Forgotten**

You can have your personal data deleted if it is incorrect, if it is no longer needed or has been processed unfairly or unlawfully. We will keep a record of your request so we know why your personal data was deleted.

### **Right to Portability**

You can ask for a copy of all personal data 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 your personal data 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 data.

### **Right to Access**

You have the right to know what personal data we hold about you and to receive a copy of your personal data. 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 to access personal data about anyone else.

To access your personal data please write to us or email us using the contact details in **Section 8** of this Data Privacy Notice.

## 8. How to Contact us:

8.1 If you have any queries in relation to this Privacy Notice please contact us using these contact details:

Address: Irish Life Centre, Lower Abbey St, Dublin 1 Email: <a href="mailto:dataprotectionqueries@irishlife.ie">dataprotectionqueries@irishlife.ie</a> Telephone: +353 (0)1 704 1010
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8.2 If your queries are not satisfied or you wish to escalate any matter for the attention of our Data Protection Officers, the relevant contact details are below with links to the data privacy notice for each company.

Contact Details	Privacy Notice
Data Protection Office Irish Life Assurance plc Irish Life Centre, Lower Abbey Street, Dublin 1  Telephone + 353 (01) 704 1969  Email: <a href="mailto:ILADPO@irishlife.ie">ILADPO@irishlife.ie</a>	<a href="#">Access Irish Life Assurance privacy notice</a>
Data Protection Office Irish Life Financial Services, Irish Life Centre, Lower Abbey Street, Dublin 1  Telephone + 353 (01) 704 1969  Email: <a href="mailto:ILFSDPO@irishlife.ie">ILFSDPO@irishlife.ie</a>	<a href="#">Access Irish Life Financial Services privacy notice</a>
Data Protection Office Irish Life Health Block D, E, F Irish Life Centre, Lower Abbey Street, Dublin 1  Telephone + 353 (021) 480 2040  Email: <a href="mailto:compliance@irishlifehealth.ie">compliance@irishlifehealth.ie</a>	<a href="#">Access Irish Life Health dac privacy notice</a>

## 9. Irish Life Companies/Data Controller Details

Irish Life Assurance plc, Irish Life Centre, Lower Abbey St, Dublin 1, Ireland  
Registered in Ireland. Registered Number: 152576. Irish Life Assurance plc is regulated by the Central Bank of Ireland

Irish Life Financial Services Limited, Irish Life Centre, Lower Abbey St, Dublin 1, Ireland  
Registered in Ireland. Registered Number: 489221. Irish Life Financial Services Ltd is regulated by the Central Bank of Ireland

Irish Life Health dac, Irish Life Centre, Lower Abbey Street, Dublin 1, Ireland  
Registered in Ireland. Registered Number: 376607. Irish Life Health DAC is regulated by the Central Bank of Ireland

## 10. Complaints

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, 21 Fitzwilliam Square South Dublin 2 D02 RD28
Telephone:	+353 (0761) 104800
Email: <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>	<a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>

This Privacy Notice is effective from June 2020