

Irish Life Financial Services Ltd.

Privacy Notice

At Irish Life, we are committed to protecting the privacy of your personal information. This Privacy Notice explains how we do this, as well as letting you know about your rights in relation to your personal information.

1. Irish Life Group:

Irish Life Group companies offer a broad range of life assurance, health insurance, pensions and investments products, as well as financial advice and health and wellbeing services. Our companies collect, use and share personal information so that we can provide you with products and services as data controllers and also, in some circumstances, as joint data controllers. What personal information is collected, how your personal information is used and shared and your rights in relation to your personal information is explained in the Privacy Notice of the relevant Irish Life Group data controller. We will direct you to the relevant Privacy Notices when we collect personal information from you, for example when you ask for a quote or apply for one of our products. Please read these Privacy Notices carefully, as they will explain which Irish Life Group company or companies are responsible for managing your personal information and include specific information about how we will use your personal information in relation to products and services that we provide to you.

All Irish Life Privacy Notices are available here www.irishlife.ie/privacy-notices

2. What is a Privacy Notice & why is it important?

We know your personal information is important to you and it is important to Irish Life Financial Services Ltd too. This Privacy Notice tells you what we use your personal information for and explains your rights around how we use it. It includes details of joint data controller services where we use your personal information together with Irish Life Assurance plc and Irish Life Health dac, to provide shared services. 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.

3. What Personal information we collect and why?

We use personal information to give you financial planning advice and other separate services. Depending on the type of financial advice or service you are looking for, we will need to collect personal information such as your name, date of birth and contact details, in addition to financial information such as income, expenses, assets, occupation, health and information about your dependents.

If we are the appointed financial adviser on any of your plans we will act as your intermediary for those plans.

In addition we use personal information to efficiently manage our business including to:

- > **improve our services;**
- > **perform financial reporting, comply with laws, and to manage our risks.**

We also use personal information on a joint data controller basis, with Irish Life Assurance plc and Irish Life Health dac, in order to provide shared services to you. Your name, contact details, date of birth and plan holdings are needed for this. Shared services provided on a joint data controller basis include:

- > **On-line digital services such as MyIrishLife;**
- > **Irish Life Group consent preferences such as direct marketing;**
- > **Integrated customer services as we develop our shared customer experience.**

4. Lawful Basis for Processing

We must have a lawful basis to collect and use personal information. This is explained below:

Needed to perform your contract:

We use your personal information to provide contracted services or to take steps requested by you before you enter a contract. The terms and conditions of these services will be set out in your contract and these activities can include providing a quote, providing you with financial advice, corresponding with you regarding your plan and addressing your plan queries and service requests.

If you ask us to provide financial advice, we will assess your financial needs and recommend financial solutions to help meet your identified needs. 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.

Depending on the products and services, we will need to collect personal information such as your name, date of birth and contact details, in addition to financial information such as income, expenses, assets, occupation, health and information about your dependents.

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.

Required by law:

We use your personal information to comply with law, statutory codes and regulations, for example:

- > 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 reduce duplicate customer records and to comply with your Data Protection rights. Please see section 10 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.

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, including your right to object. We believe these uses benefit our customers. You can contact us if you have any questions using the details in section 11 of this Privacy Notice.

Call Recording:

Calls are recorded for staff training and monitoring, as well as maintaining a record of customer transactions we complete over the phone. We also save the number you're calling from to help us handle your call and direct you to the most suitable team. This includes calls through landline, internet or mobile. We will let you know if a call is being recorded at the start of the call so you can decide to continue or not.

Customer Research:

To help improve the level of service we provide, we may on occasions contact you for participation in consumer satisfaction or research surveys.

Customer queries and service requests:

After your plan has ceased, when you or your appointed representative send us a query, concern or request a service we will collect and use personal information needed to respond to your request. We will also use your plan information to respond to your queries and requests.

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.

Sharing with Appointed Representatives:

Where necessary, your personal information is shared with appointed or legal representatives, for example in the case of an estate or trustees appointed by employers for pension or life assurance trusts.

Customer Verification with other Irish Life Group Companies:

We maintain a record of customers across certain Irish Life Group companies using personal information such as your name, date of birth and contact details in order to verify you and your plans. This allows us to provide Irish Life shared services to you and to jointly hold and share your consent preferences, such as for direct marketing.

Safety, Security and Fraud Prevention:

We capture and hold data from email, web and network traffic to monitor and protect information security and to support investigation around cyber or data loss events (e.g. a malicious act – virus or hacking).

If you visit our offices we will record CCTV footage for safety and security reasons. We only hold these recordings temporarily and for longer if we need to for safety and security investigations.

We use personal information to prevent, detect and identify suspicious or fraudulent activities including non-disclosure.

Aggregate Analytics and Statistics:

We perform data analytics and statistical analysis on our products and customers across the Irish Life Group companies to allow us to understand how our customers interact with us, what products and services customers avail of and to help develop and promote our products and services. Aggregate reports are used for these purposes where individuals are not identifiable.

Individual Analytics and Profiles:

We continue to develop our data analytics to provide insights including behavioural attributes at individual customer level to improve the efficiency of our business and the quality of service we provide to our customers. This includes helping us identify existing groups of customers that may benefit from early and ongoing engagement in relation to financial needs, objectives and our products and services. This will include personal information, but not special category information such as medical information.

With Your Consent:

You need to give your 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.

Direct Marketing:

Where you have consented, we may use your personal information to contact you about offers and services from across the Irish Life Group companies, separately from your plan communications. We will only send you direct marketing content where we have your consent.

Biometric Data:

Where you have consented, we may collect biometric information, for example to identify you through voice, facial or fingerprint recognition technology.

Where you have consented, we will collect and process biometric, health and other related personal information to provide additional services such as mobile app services that help you track your health goals. We will specify what we will use this personal information 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.

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.

Additional Products and Services from Irish Life Group:

We will ask for your consent before sharing your Irish Life Financial Services Ltd information with our group companies to offer you additional products and services from the Irish Life Group. In the shared MyIrishLife digital portal, provided jointly with Irish Life Assurance plc and Irish Life Health dac, we can display additional plan information such as plan value, with your consent.

5. Consent and how to withdraw consent?

Where 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. For shared on-line digital services, such as the MyIrishLife portal, you can also change or withdraw consent using the preference settings.

You are also able to withdraw consent by contacting us directly using the details in section 11 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.

6. How and where do we get your personal information from?

You provide us with your personal information directly when you contact us, complete our forms, use our on-line digital services, 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 our Cookies Policy at www.irishlife.ie/cookies-policy.

If you use a shared service provided jointly by Irish Life Group companies, we will receive the personal information collected through that service.

We receive contact details and plan holdings from Irish Life joint data controller companies Irish Life Assurance plc and Irish Life Health dac to verify you and your plans and to allow you to avail of Irish Life shared services.

We also get personal information from agents, brokers, financial advisers, solicitors, licenced private investigators, employers, trustees or regulators (where relevant).

If you are the person insured under a protection plan, we will get relevant personal health information from your health professionals. If we have accepted your cover based on a proposal and underwriting decision with another insurer we will get relevant personal information and personal health information from that insurer in order to process any claims.

We will check if you have similar cover or claims already in place with other insurers for certain plans, in line with Revenue rules.

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.

7. 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 and print management, call centre telephony, IT infrastructure solutions, cyber security, payment service providers, administration, marketing and mobile app services.
- **Your Product Provider(s):**
 - > If we act as your intermediary to service and advise on your plan(s).
- **Trustees or other Legal or Personal Representatives:**
 - > appointed in connection with the plan contract.
- **Employers:**
 - > where your plan has been set up through your employer, we will share information with them to the extent that is required in order to administer the group or company plan.
- **Regulators:**
 - > Regulatory bodies and agencies or as needed to comply with regulations, statutory codes and laws.
- **Irish Life Group Companies:**
 - > We pass your personal information to other Irish Life Group companies for statistical purposes and data analytics on an aggregated basis.

- > We also pass your contact details and product holdings to verify you and allow us to offer you Irish Life shared services.
- > Where you avail of Irish Life shared services, we will pass information collected through those services to Irish Life joint data controller companies, Irish Life Assurance plc and Irish Life Health dac.
- **Third Parties for digital advertising and marketing:**
 - > Your online activity will be shared with third party providers such as social media platforms, where you consent to marketing cookies.

8. Do we transfer your personal information outside of the EU?

While your personal information is generally processed and stored within the EU, in limited circumstances we do transfer personal information outside the EU. Examples of countries where personal information is transferred to include the UK, Canada, USA and India.

Some of our service providers and data processors are global companies who may transfer data outside of the EU such as for service support. This includes our cyber security services, for example. We pass personal information securely to our parent company Great-West Lifeco in Canada. We do this for administration purposes, for recording of legal claims and for screening our customers against Financial Sanctions and PEP lists, to comply with Anti-money Laundering rules. Our parent company, Great West Lifeco has a legal obligation to maintain a list of our identified high-risk customers.

Passing your personal information to certain countries, including the UK and Canada, is allowed under an Adequacy Decision made by the European Commission. Where we, our service providers 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 use Model Standard Contractual Clauses for transfers of personal information outside of the EU to countries or regions without an Adequacy Decision, to ensure that any personal information leaving the EEA will be transferred in compliance with EU data protection law. These are available by contacting us.

9. 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 and for as long as we have to under regulations.

Where you have availed of a regulated product or service, we will retain your personal information for 7 years after your relationship has ended.

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.

In some cases, deleting certain records including identifiers such as plan number is not possible, while maintaining system integrity. Where this occurs, we have taken steps to pseudonymise the personal information and limit the processing to maintaining this data securely.

Prior to deleting records, we will hold personal information in archive storage and limit the processing to maintaining this data securely and to ensure that no customer errors or queries arise prior to deletion.

10. 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 11 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 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 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 information. As above you have the right to withdraw consent and object, for example, to 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 Irish Life Financial Services Ltd 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 to personal information about anyone else.

To access your personal information please write to us or email us using the contact details in section 11 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.

11. How to contact us

You can contact us with any questions about your personal information and this Privacy Notice:

-  Irish Life Financial Services Ltd, Irish Life Centre, Lower Abbey Street, Dublin 1
-  +353 (0)1 704 1010
-  dataprotectionqueries@irishlife.ie
-  www.irishlife.ie



12. Data Protection Officer

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

-  Data Protection Officer, Irish Life Financial Services Ltd, Irish Life Centre, Lower Abbey Street, Dublin 1
-  +353 (0)1 704 1969
-  ILFSDPO@irishlife.ie

13. Irish Life Joint Data Controllers

You can also contact the Data Protection Officers of both our joint data controllers, Irish Life Assurance plc and Irish Life Health dac using the contact details below:




-  **Irish Life Assurance plc**, Irish Life Centre,
Lower Abbey Street, Dublin 1
-  +353 (0)1 704 1969
-  ILADPO@irishlife.ie
-  www.irishlife.ie

- Irish Life Health dac**, Irish Life Health Block D,
Lower Abbey Street, Dublin 1
- +353 (0)1 562 5100
- ILHDPO@irishlifehealth.ie
- www.irishlife.ie

14. 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:

-  Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28
-  +353 (0761) 104800 / 1800 437 437
-  info@dataprotection.ie

This Privacy Notice is effective from August 2023.