

Privacy Notice

Privacy Policy and Cookie Policy

iQ Financial respects an individual's right to privacy and complies with its obligations under the General Data Protection Regulation (EU Regulation 2016/679). The purpose of this Website Privacy Policy is to outline how iQ Financial deals with any personal data that is provided to it while visiting this website. Users should not use this website if they are unhappy with this policy. By visiting this website, users are accepting the terms of this Website Privacy Policy. Any external links to other websites are clearly identifiable as such, and iQ Financial is not responsible for the content or the privacy policies of other websites.

Summary of activities of the business

iQ Financial provides a bespoke and comprehensive Lifestyle Financial Planning service which is unique to you. We produce personal financial plans which include lifetime cashflow forecasts. Where the needs of a plan require an investment, insurance or pension product we recommend and process those products on your behalf.

Our registered office is at 50 John Street, Sligo, F91 PP3X.

OVERVIEW

This policy applies when you visit and interact with our website at www.iqf.ie and to the financial services that we provide to you. It contains information about:

- how we use your data;
- what personal data we collect;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

INTRODUCTION

This privacy policy will inform you as to how we look after your personal data when you visit www.iqf.ie (the "Website") (regardless of where you visit it from) as well as when you instruct us as a client ("Services") and tells you about your privacy rights and how the law protects you.

IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

iQ Financial is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

Contact details

If you have any questions about this privacy policy, please contact us using the details set out below

Contact details

Our full details are:

Name: iQ Financial

Email address: office@iqf.ie

Postal address: 50 John Street, Sligo, F91 PP3X

Telephone number: 071 9155560

You have the right to make a complaint at any time to the Data Protection Commission (DPC), the Irish supervisory authority for data protection issues (www.dataprotection.ie). We would, however, appreciate the chance to deal with your concerns before you approach the DPC, so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 15 December 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Types of Information Collected

To allow us to deliver our service to you we collect 2 types of information.

Personal Data:

This is data that identifies you or can be used to identify or contact you and may include comprehensive personal financial information including, but not limited to, your contact details, PPSN, income, expenses, pensions, current assets, liabilities and the estimated cost of future life events. Such information is only collected from you if you voluntarily submit it to us.

Non-Personal Data:

Like most websites, we gather statistical and other analytical information collected on an aggregate basis of all visitors to our website.

This Non-Personal Data comprises information that cannot be used to identify or contact you, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymized, browser types and other anonymous statistical data involving the use of our website.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Identity Data includes first name, last name.

Contact Data includes email address.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website.

Profile Data includes your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use the Website and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with certain services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Information about connected individuals

We may need to gather personal information about your close family members and dependants in order to provide our service to you effectively. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us. We'll provide a copy of this privacy notice for them or, where appropriate, ask you to pass the privacy information to them.

Purposes for which we hold your information

Non-Personal Data:

We use the Non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us better design and organise our website.

Personal Data:

We will process any Personal Data you provide to us so that we can send you the information you have requested and to provide information that may be useful to you.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [*contact us*](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
<p>1. Sending you a newsletter via email by using the 'Sign up to our newsletter' function on the Website</p> <p>2. Providing your name, telephone number and email address in the 'Request a callback' function on the Website</p> <p>3. When you contact us via email by clicking on the email address links or 'get in touch' links on the Website</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Marketing and Communications</p>	<p>Consent</p>
<p>To discharge our duties as your adviser</p>	<p>All information necessary to act as your financial adviser, including, but not limited to:</p> <p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Financial</p> <p>Employment</p>	<p>Performance of contract</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to complete a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Usage</p> <p>Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

<p>To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity Contact Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant Website content to you and measure or understand the effectiveness of the content we serve to you</p>	<p>Identity Contact Profile Usage Marketing and Communications Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences</p>	<p>Technical Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Identity Contact Technical Usage Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

Disclosure of Information to Third Parties

We may provide Non-Personal Data to third parties, where such information is combined with similar information of other users of our website. For example, we might inform third parties regarding the number of unique users who visit our website, the demographic breakdown of our community users of our website, or the activities that visitors to our website engage in while on our website. However, we do not sell or share any information about individual users. We will not disclose your Personal Data to third parties unless you have consented to this disclosure or unless the third party is required to fulfil your request for information (in such circumstances, the third party is bound by similar data protection requirements). We will disclose your Personal Data if we

believe in good faith that we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We use the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us by completing forms or submitting an enquiry via our website.

Third-party marketing

We will share your personal data with our marketing agency for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Regulatory Agencies for financial services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit them to process your personal data for specified purposes and in accordance with our instructions or in accordance with applicable laws.

INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

Security

Your Personal Data will be held on secure servers. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data and we treat all the data held with the utmost care and security.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Updating, Verifying and Deleting Personal Data

You may inform us of any changes in your Personal Data, and in accordance with our obligations under the General Data Protection Regulation (EU Regulation 2016/679) we will update or delete your Personal Data accordingly. To find out what Personal Data we hold on you or to have your Personal Data updated, amended or removed from our database, please email us at office@iqf.ie

Changes to the Website Privacy Policy

Any changes to this Website Privacy Policy will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time, we decide to use Personal Data in a manner significantly different from that stated in this Website Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether we use your information in the new manner.

The Cookie Policy

This Cookies Policy explains what Cookies are and how we use them. You should read this policy so you can understand what type of cookies we use, or the information we collect using Cookies and how that information is used.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from Cookies. For further information on how we use, store and keep your personal data secure, see our Privacy Policy.

We do not store sensitive personal information, such as mailing addresses, account passwords, etc. in the Cookies we use.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [\[LINK TO YOUR COOKIE POLICY.\]](#)

Interpretation and Definitions

Interpretation:

The words of which the initial letter is capitalized have meanings defined under the following conditions.

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions:

For the purposes of this Cookies Policy:

- Company (referred to as either “the Company”, “We”, “Us” or “Our” in this Cookies Policy) refers to iQ Financial, 50 John Street, Sligo, F91 PP3X.
- ‘You’ means the individual accessing or using the Website, or a company, or any legal entity on behalf of which such individual is accessing or using the Website, as applicable.
- Cookies means small files that are placed on your computer, mobile device or any other device by a website, containing details of your browsing history on that website among its many uses.
- Website refers to iQ Financial, accessible from www.iqf.ie.

The use of the Cookies**Type of Cookies we use:**

Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as You close your web browser.

We use both session and persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Tracking and Performance Cookies

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new advertisements, pages, features or new functionality of the Website to see how our users react to them.

Social Media Cookies

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: In addition to Our own Cookies, we may also use various third parties Cookies to report usage statistics of the Website, deliver advertisements on and through the Website, and so on.

These Cookies may be used when you share information using a social media networking websites such as Facebook, Instagram, Twitter or Google+.

Your Choices Regarding Cookies

If you prefer to avoid the use of Cookies on the website, you may do so by changing your settings by clicking on the floating button on the bottom left of your screen. You can also disable the use of Cookies in your browser and delete the Cookies saved in your browser associated with this website. You may use this option for preventing the use of Cookies at any time for any website.

If you do not accept our Cookies, you may experience some inconvenience in your use of the Website and some features may not function properly.

If you would like to delete Cookies or instruct your web browser to delete or refuse Cookies, please visit the help pages of your web browser.

- For the Chrome web browser, please visit this page from Google: <https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser, please visit this page from Microsoft: <http://support.microsoft.com/kb/278835>
- For the Firefox web browser, please visit this page from Mozilla: <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- For the Safari web browser, please visit this page from Apple: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For any other web browser, please visit your web browser's official web pages.

Contact Us – If you have any questions about this Cookies Policy, you can contact us by email: office@iqf.ie

DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

ACCESS TO YOU DATA

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time.