

## Privacy Notice

This policy applies to all iQ Financial's Lifestyle Financial Planning Services for Clients, the processing of regulated products that may be required to serve the needs of the Client's Plan, the processing of prospective client information, iQ Financial employee information, and visits and interactions with our website [www.iqf.ie](http://www.iqf.ie).

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 Privacy Policy is to outline how iQ Financial deals with any personal data that is provided to it

### Summary of activities of the business

iQ Financial is a company of financial advisers who provide a bespoke and comprehensive Lifestyle Financial Planning service for Clients. 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 the Clients' behalf.

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

### OVERVIEW

This policy contains information on:

- what personal data we collect;
- how we use personal data;
- how we ensure the privacy of personal data, and
- your legal rights relating to your personal data.

### IMPORTANT INFORMATION AND WHO WE ARE

#### Controller

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

### Contact Details

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

Company name: iQ Financial

Email address: [office@iqf.ie](mailto:office@iqf.ie)

Postal address: 50 John Street, Sligo, F91

PP3X Telephone number: +353 (0)71

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: DPC, 21 Fitzwilliam Square South, Dublin 2 D02 RD28, tel. 1800 437 737, website: <https://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 02 April 2024.

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 Lifestyle Financial Planning and regulated services to you we collect two 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:

- name
- postal address
- mobile and landline telephone numbers
- email address
- date of birth
- gender
- PPSN
- employment details
- occupation
- salary
- assets and liabilities
- expenses and estimated costs of future life events
- medical history
- details of existing financial arrangements
- details of dependents (name, age, plans)
- client priorities, aspirations, and concerns
- client attitude to risk
- client investment history
- Marketing and Communications Data including your preferences in receiving marketing from us and our third parties and your communication preferences.

Such information is only collected from you if you voluntarily submit it to us.

- **Non-Personal Data:**

Like most websites, [www.iqf.ie](http://www.iqf.ie) ('the Website') gathers 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.

**Non-personal data includes:**

- **Technical Data** includes internet protocol (IP) address, 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.
- **Usage Data** includes information about how Website users use the Website and services.

**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 at the time if this is the case.

**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. For example, we may need to know the medical history of your biological parents for insurance applications, or hold information related to your adult children to help with your estate planning. Our legal basis for processing this information is performance of a contract, i.e. the provision of our financial planning services to you, as listed in the table below.

**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.

**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.

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>Providing your name, telephone number and email address in the Book a 'Learn More Call' function on the Website</p> <p>2. When you contact us via email, by clicking on the email address links or 'Get in touch' links on the Website, or by telephoning or visiting our office to book a meeting</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p>	<p>Consent</p>
<p>3. Sending marketing communications to Clients</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p>	<p>Necessary for our legitimate interests - to send client communications on financial products or services we believe may be of interest.</p>
<p>To discharge our duties as financial advisers using the Personal Data list above, including:</p> <p>(a) Providing financial planning services/products</p> <p>(b) Complying with financial regulations</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>Necessary to comply with a legal obligation</p>
<p>To manage our relationship with Clients, including:</p> <p>(a) Discussing financial plan updates</p> <p>(b) Notifying you about changes to our terms or privacy policy</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p>	<p>Performance of a contract with you</p>

<p>To manage our relationship with Clients, including:</p> <p>Marketing and Communications -</p> <p>(a) Asking you to leave a review or take a survey</p> <p>(b) Asking you to update your contact details or client profile</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Usage</p>	<p>Necessary for our legitimate interests - to keep our records updated and to study how customers use our products/services</p>
<p>To manage our relationship with prospective Clients</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Usage</p>	<p>Necessary for our legitimate interests - to study how prospective Clients are a fit or not with our products/services, to grow our business and to inform our marketing strategy</p>
<p>To manage our relationship with third-party contractors or consultants</p>	<p>Identity</p> <p>Contact</p>	<p>Performance of a contract</p>
<p>To manage our relationship with employees</p>	<p>Identity</p> <p>Contact</p> <p>Financial data</p>	<p>Performance of a contract</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</p> <p>Contact</p> <p>Technical (e.g. IP address)</p>	<p>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</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</p> <p>Contact</p> <p>Profile</p> <p>Usage</p> <p>Technical (e.g. IP address)</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>

### 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 of 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 user information related to individuals or in the aggregate. 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.

### **Third-party marketing**

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

### **Marketing**

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

- **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, using our Contact Details above.

### **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes described in the table of Purpose/Activity 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](mailto:office@iqf.ie)

### **Changes to the Privacy Policy**

Any changes to this Privacy Policy will be posted on our 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 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.

## **DATA RETENTION**

### **How long will you retain my personal data for?**

The personal data we use to process any regulated product provided to serve the needs of our Clients' Lifestyle Financial Plan will be retained for at least 6 years from the time the advice was given in line with our regulatory requirement.

We will retain Clients' personal data for the lifetime of your relationship with us.

We will retain the personal data of prospective clients for 12 months until they either become a Client, or decide not to become a client, or we do not receive any further communication from them, on the basis of legitimate interest.

We will retain the personal data of third-party consultants or contractors for the period of any contract or business relationship and for 12 months after any contract or business relationship ends, on the basis of performance of a contract.

We will retain the personal data of employees for the period of their employment and for 36 months after any employment ends, on the basis of legal obligation.

## **ACCESS TO YOUR 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**

Data Subjects may contact us using the Contact Details above to exercise any of their Data Subject rights:

**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.