

# Data Privacy Notice

Privacy Notice for Synergy Finance, Block B, The Crescent  
Building, Northwood Park, Dublin 9

21<sup>st</sup> of May 2018

This is the privacy notice of Synergy Finance and tells you what we use your personal information for and explains your rights around how we use it. 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.

Synergy Finance complies with the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018. Should you have any queries, please contact Emer Eyres 087 9229813, [emer@synergyfinance.ie](mailto:emer@synergyfinance.ie)

## Collection and use of Personal Data

We use personal information to arrange transactions on your behalf as agreed with you, to service our customers, assist with claims and the payment of plan benefits. We must have a lawful basis to collect and use personal information.

- **Needed For Your Contract:**

We need to collect and use your personal information to provide your plan contract. This includes, but is not limited to, your name, date of birth, contact and bank account details. Depending on the plan type this can include health, employment, pension and salary information. We restrict access to, and use of, any sensitive personal information. We also create new personal information.

Personal information needed for plan contracts is held and used to;

- process your application;
- set up and issue your plan;
- provide you with information about your plan;
- to help the administration of your plan and assist with the payment of your plan benefits;
- provide customer care and service; and
- contact you to inform you of any relevant actions you may need to take.

- **Required By Law:**

We use your personal information to comply with law and regulations such as;

- reporting to regulators;
- keeping proper books and records; and

We carry out internal reporting, quality checking, compliance controls and audits to help meet these obligations.

We must collect certain personal information to comply with Anti-Money Laundering law. This depends on your plan type. To do this, we use your name, date of birth, address, nationality and occupation information.

- Up to date proof of identification and address.
- Screening of all customers against Financial Sanctions and Politically Exposed Persons (PEP) lists.
- Where needed we carry out searches of publicly available information

You must give us your tax residence information and tax identification number for tax reporting with product producers. In order to give you information and updates on your plan, we use your plan and contact details. We use our customer personal information, including yours, to identify the target market for our regulated services.

In order to receive financial advice from us, you must give personal and financial information for your current and future needs to be assessed. This enables us to recommend the most suitable financial product for you. This also involves creating new and assumed personal information about you. We complete an analysis of you using your personal information to comply with regulations. When you give us your personal information we will check to see if we already have a record of you. This helps us to comply with your Data Protection Rights.

### **Legitimate Interest:**

We use your personal information for our legitimate interests as shown below. This doesn't affect your privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions using the above contact details of this Privacy Notice.

- Statistical Analysis
  - We combine and group personal information for analysis to help us understand our customers and develop better services for you.
  - We use summary information to help promote our services and products from our product providers.

### **YOUR CONSENT:**

You need to give 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.

- Profiling:
- Direct Marketing:
  - We would like to be able to contact you about offers and services from across our group of companies, separately from your plan communications. We will only send you direct marketing content where we have your consent. When you use our website you can consent to third party advertising. This shows you our ads where you have visited our website before or visited other websites offering similar products and services.
- Sharing with Other Companies with whom we have business arrangements
  - We believe it may help you if we know whether you have products and services provided by other companies or if other services may be of interest to you. We will use this to provide you with additional services with your consent.

### **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 your consent, e.g. you can change your mind using the opt-out link in any direct marketing emails sent to you.

You will also be able to withdraw consent by contacting us directly.

### **How and Where do we get your Personal Information**

You provide us with your personal information directly when you contact us, complete our forms, speak with us or visit our website, and social media accounts. For more information on what personal information is collected and used on our website please see our Website Privacy Policy. We also get personal information from solicitors, employers or regulators (where relevant).

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.

## **To Whom do we Pass your Personal Information**

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 Life companies and CRM systems – BIIS
- The categories of services that we use other Data Processors for include medical underwriting – including nurse screening and independent medical exams when required

- **Trustees:**

- appointed in connection with the plan contract.

- **Investment Service Providers:**

- We pass limited personal information to investment service providers where you want to access these services through your plan e.g. Stockbroker or Online Trading Platform.

- **Regulators:**

- Regulators and the Revenue Commissioners or as needed to comply with regulations and laws.

- **Other Companies:**

- We pass your personal information to third parties, including other companies within the Group, with your consent.

## **DO WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE OF THE EU?**

Your personal information is processed and stored within the EU.

## **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 needed for disaster recovery and for as long as we have to under regulations. We will let you know how long we keep personal information for when you avail of a single or specific service such as a quote or call-back.

## **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 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 current regulations. 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. We will inform you of our updated Privacy Notice, if we change the type of personal information we collect and / or how we use it. 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 delay.

- **Right to Restrict or Object**

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.

• **Right to Correct and Update**

You can ask us to correct and update personal information we hold about you. Your plans are long term contracts and to provide you with the best service it is important we have your up to date personal information, such as contact details.

• **Right to Delete and Be Forgotten**

You can have your personal information deleted if it is incorrect 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 product or service to 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 us 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. We will not likely 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 for underwriting 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; and
- 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 information about anyone else. To access your personal information please write to us using the contact details in 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.