DATA PRIVACY NOTICE

Introduction

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Life, Pensions, Investments and Mortgages. We provide our services from the selection of products provided by the Companies we have agencies with. We recommend the product that, in our professional opinion, is best suited to you. In providing this service to you we will need to obtain personal information from you. The following outlines how we deal with this information and how it is used. Any questions or concerns you have can be addressed to us directly.

This Privacy Notice sets out the bases on which we gather, use, process and disclose any Personal Data we collect about you, or that you provide to us. This Privacy Notice applies to you, whether you are a current, past, or prospective customer.

It also applies to third parties whose Data you provide to us in connection with our relationship with you (for example, the names of relatives). Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to us.

Who controls your Personal Data and how can you contact them?

We control your Personal Data to allow us to give you advice and recommendations on your financial affairs, your data is then passed onto the relevant company/companies we have agencies with by way of application forms, by post, email or through their secure websites online.

Data we may collect about you

In order for us to give you a recommendation and information on financial products, we need to collect and process personal information about you. If you do not provide the information we need, we may not be able to offer you advice or provide our services to you. The types of personal data that are processed may include:

- Individual details - Name, address (including proof of address), other contact details (e.g., email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you.
- Financial detail – details on any debts, loans, or assets you may own. Salary and bank details such as IBANs and branch location.
    - Identification details - Identification numbers issued by government bodies or agencies, including your PPS number, passport number, tax identification number.

Special Categories of Personal Data

- Health information which has additional protection under Data Protection Law. We do not process health information other than hold the information on application forms you have filled in. The Life Insurers process and control your health data to allow them to underwrite your policy or decide to decline cover. They may have further information they have obtained with your approval from your doctor, but we are not privy to this information.
- Claims information – information you give us with regards claims you notify us about or ask for help on.
- Policy Information - Information about the quotes you receive and policies you take out.

Where We May Collect Your Personal Data From

We may collect your personal data from various sources, including.

- You.
- Your employer or an appointed representative.
- Life Companies we have agencies with.
- When you sought a quote from us.
- If you have or had any other contracts of insurance that is not under our agencies.
- In this instance, we will need a letter of authorisation from you to allow us to contact other companies on your behalf.
- When you visit our website and input a request for us to contact you.

Which of the above sources apply, will depend on your particular circumstances and the product or service you are interested in, or your enquiry relates to.

Legal Basis for Processing Your Information

We will only use your Personal Data for lawful reasons. These are:

- The use is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract (such as providing a recommendation)
- The use is necessary to comply with our legal obligations.
- You have consented to us using your information in such a way.
- The use is necessary for the purpose of our legitimate interests.
- The use is necessary for the performance of a task carried out in the public interest, such as assisting a regulatory authority's investigation of a criminal offence.

The Purpose of Processing Your Information

- To give you information on and provide you with recommended financial products.
- Disclose data to policyholder, life assured, beneficiary, trustee, assignee, successors, group company or to other parties.
- To comply with legal and regulatory requirements including Anti- Money Laundering and Sanctions compliance.
- To understand how people, interact with our websites (if applicable)
- To carry out and determine the effectiveness of advertising, and of marketing campaigns.

Who We Share Your Information With?

To provide our services and to comply with legal obligations imposed on us, we may share your information with:

- Pension Trustees, & beneficiaries of Pensions & other Financial Products, Relatives & guardians, (in certain circumstances and within the law)
- Employers - past, present, and prospective.
- Legal, financial, investment, medical & other professional advisors in the process of submitting your application.
- Companies we may outsource some of our services to.
- Businesses that refer your business to us.
- Any business which we are required by law to share the information with, i.e. compliance resource companies.
- Database provider all data encrypted.
- The Pensions Authority.
- Stockbrokers we have agencies with.
- Insurance and Assurance companies we have agencies with.
- Investment Companies we have agencies with.
- An Garda Síochána. (Anti Money Laundering)
- Revenue (Anti Money Laundering)
- Central Bank of Ireland. We are authorised by the Central Bank, and they have the right to inspect our files.
- The Financial Services Ombudsman. In the event of a complaint.
- Data Protection Commissioner.
- Lenders we have agencies with.

How Long Do We Keep Your Information?

When providing products to you it may be necessary to retain your information for an extended period. We keep your information for as long as required by law for the purpose that you gave it to us for. As a rule, for legal and best practice reasons we are required to keep your information for 6 years after the date on which our relationship with you ends.

Your Rights to Access, Transport, Correct, Delete and Restrict the Use of Your Personal Data

Accessing Your Personal Data

You have the right to access a copy of your Personal Data which we hold for you. In the case of Personal Data, you provided to us to process based on your consent or for automated processing, you have the right to have it provided in a commonly used electronic format to you or to another Data Controller (subject to applicable Data Protection Law).
If you would like a copy of your Personal Data, please contact us. Your request will be dealt with as quickly as possible and in any event within a month for us to respond. If at that stage, we are unable to provide the data you require (due to the complexity or number of requests) we may extend the period to provide the data by a further two months but shall explain the reason why. There is no charge for the request for your data, but it must be in writing, fax, email, or text message.

Correcting Your Personal Data

You have the right to have your Personal Data corrected if you feel we have incorrect data held on you.

Deleting Your Personal Data

Subject to any overriding legal obligation requiring us to retain it, you have the right to have your Personal Data deleted, however erasing your information may make it difficult or impossible for us to give you information on, provide you with, or administer our financial products. If you want your information deleted, please contact us.

Restricting our use of your Personal Data

You have the right to restrict our use of your Personal Data in certain circumstances. If you wish to exercise your rights in this regard, please contact us.

Automated/Profiling Decision Making

Where we use automated decision-making, you will always be informed & you will be entitled to have a person review the decision so that you can contest it and put your point of view and circumstances forward. E.g., When we produce quotes for the business you are contacting us about. When we want to market to you, we may run a program which allows us to identify certain criteria of clients (all those with that fit within a certain criterion for example)

Your Right to Object and Withdraw your Consent to Data Processing

Where our lawful basis for processing your Personal Data is based on our legitimate interests, you have the right to object. You also have the right to withdraw your consent to any processing at any time.
However, if we cannot process your data, it may make it difficult, impossible, or unlawful for us to give you information on, provide you with, advice on financial products. If you want to object or withdraw your consent to processing, please contact us.

Your Right to Make a Complaint

If you are dissatisfied about the way we handle your Personal Data please contact us. We will do our best to address your concerns swiftly and resolve any issues you have.
All complaints must be sent to complaints@fairstone.ie or the Complaints Team, Fairstone Ireland Group, Maple House, Lower Kilmacud Road, Stillorgan, Co Dublin, A94 E3F2.

You have the right to complain to the Data Protection Commission, 6 Pembroke Row, Dublin 2 D02 X963. www.dataprotection.ie Tel.: +353 (01)765 0100

Artificial Intelligence (AI) Usage.

Fairstone Ireland utilises Fairstone Co Planner in client consultations. Fairstone Co Planner uses AI to record the conversations between Clients and their Fairstone advisers to create a transcript and notes from their meeting – a process called AI Transcription. This will create an accurate record of your conversation with your Financial Adviser. Fairstone are not making changes to the scope of data we collect, nor the purpose for which we collect it as detailed elsewhere in this notice. Data collected may include Special Category Data as defined under the GDPR.
All information recorded using this tool is processed in compliance with the GDPR. Your data is currently stored in a trusted UK-based data centres run by Microsoft Azure and Amazon Web Services, two of the world's leading cloud service providers, which are subject to EU adequacy agreements. These companies follow strict security and compliance standards to protect your information.
We will not use the AI transcription services unless you provide us with consent to process this category of data. Clients can opt out of having their meeting recorded, and Fairstone will make alternative arrangements, such as manual note taking, in those circumstances. The information is only available to staff at Fairstone required to access your data to support the service(s) we provide you, or to assess the services we provide our clients. This will include your Financial Adviser, paraplanners and administrative support, as well as staff undertaking development, quality and compliance functions. Information disclosed is not used for marketing or profiling purposes and the tool will not make decisions about your finances, give advice or profile clients in any way. Fairstone is committed to the responsible use of artificial intelligence in line with the EU AI Act.

Company Information

Fairstone Asset Management DAC trading as Fairstone is regulated by The Central Bank of Ireland. Registered in County Dublin, Ireland. Registered Number 461783.

Directors: Paul Merriman, David Hickey, Derek Delany, Tom Taylor (British)

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