

# Privacy Notice

## Introduction

A Plus Financial Services Ltd is committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of A Plus Financial Services Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Paul Quigley
- Contact details of [paul@aplusfs.eu](mailto:paul@aplusfs.eu) 087 257 1019 A Plus Financial Services Ltd, 25 Offington Court, Sutton, Dublin 13, D13 T8K7
- When we refer to 'we' it is A Plus Financial Services Ltd.

Please read this Statement carefully as this sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

## Who are we?

- *A Plus Financial Services Ltd is a brokerage that provides impartial advice in respect of Protection, Pension and Investment. A Plus Financial Services Ltd has agency agreements with the following and advise on their products:-*
- *Irish Life, Zurich, Aviva, New Ireland, Standard Life,*
- *Friends First, Royal London Wealth Options, Blackbee Investments, Cantor Fitzgerald*
- *Wealth Options Capital*

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Name Paul Quigley
- Email address [paul@aplusfs.eu](mailto:paul@aplusfs.eu)
- Phone number 087 257 1019

## Purpose for processing your data

A Plus may process your data for the purposes of purchasing a Protection Policy, Pension or Investment Product.

We may require personal information regarding underwriting a protection policy such as home address, age height, weight and pre-existing medical conditions, previous rating or having been declined cover by an insurer in the past.

We will require Bank details for any regular premium to be paid and a SEPA DD Mandate.

We may require bank details for the payment of a regular premium pension and also require require a PPSN number and details of employment etc.

We will require AML for an investment in the form of copy of Passport or drivers licence, we may also require proof of PPSN and bank details should the funds be paid by EFT.

This information after its processed by A Plus Financial Services Ltd may be passed on to the protection, pension or investment provider by means of encryption via email or by post or given directly to the company providing the product to you.

*Processing Risk*

*The risks involved are that there is a data breach where your information is stolen, that the post is lost or that the recipient company has a data breach or lose your information.*

**Why we are processing your data? Our legal basis.**

In order for us to provide you with best advice in respect of Protection, Pension or Investment A Plus Financial Services Ltd need to collect personal data for underwriting a protection policy, putting in place a pension or making an Investment. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – A Plus Financial Services Ltd needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a pension contract or make an investment.

In any event, A Plus Financial Services Ltd [Click here to enter text.](#) are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

**How will A Plus Financial Services Ltd use the personal data it collects about me?**

A Plus Financial Services Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

**Special Categories of personal data**

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data) – we will ensure the below

- We will obtain your explicit consent to do so and explain to you the reason for this.

**Who are we sharing your data with?**

We may pass your personal data on to third-party service providers contracted to A Plus Financial Services Ltd in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfill the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with [Click here to enter text.](#) A Plus Financial Services Ltd procedures.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

The third party/ies that we pass your personal data to are for the purpose of putting in place business for you may be any one or number of the following depending on what business is being transacted:

- *Irish Life , Zurich, Aviva, New Ireland, Standard Life,*
- *Friends First, Royal London Wealth Options, Blackbee Investments, Cantor Fitzgerald*
- *Wealth Options Capital*

We have issued all our third party processors with a Data Processor checklist asking them GDPR specific questions

If we transfer personal data to a third party or outside the EU we as the data controller will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available.

### **Data Subjects Rights:**

A Plus Financial Services Ltd facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

### **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data.

### **Additional information we are providing you with to ensure we are transparent and fair with our processing**

#### **Retention of your personal data**

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. A Plus Financial Services Ltd will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (xxx) and our internal governance.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by A Plus Financial Services Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Organisation Name's data protection representatives Data Protection Officer / GDPR Owner

## Failure to provide further information

If we are collecting your data for a contract x and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

### Profiling – automatic decision making

*If you carry out automatic decision making you need to inform the data subject -you need to explain the significance and the envisaged consequences involved. You also need to inform that data subject can object to this.*

*e.g. ISME ratings, recruitment psychoanalytic, insurance underwriting*

*An example:*

Profiling – automatic decision making

Profiling;

Financial and mortgage advisors using profiling in their business. The main categories are

- a) Risk profiling.
- b) Profiling for marketing purposes.
- c) Establishing affordability and providing quotations for financial services and mortgage product

- a) Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customers attitude to various levels of risk having answered a series of questions.

- b) Profiling for marketing purposes.

When we seek to contact you about other services, as outlined above \* we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

- a) Establishing affordability and providing quotations for financial services products.

## Additional Processing

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

## Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 087 257 1019 or email paul@aplusfs.eu

### **Privacy policy statement changes**

A Plus Financial Services Ltd may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services you agree to this privacy policy.

This Privacy statement was last reviewed and is effective from 25/05/2018.