

Accuro Retirement Funding Ltd

Privacy Notice

Accuro 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 Accuro in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Accuro Retirement Funding Ltd
- info@accuro.ie
- 021 4350806
- When we refer to 'we' it is Accuro

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 we are?

Accuro Retirement Funding Ltd is regulated by the Central Bank of Ireland. We specialise in the area of occupational pension scheme & group risk scheme management and retirement advice for SME's, Self Employed and Individuals. We also provide individual financial advice. Accuro is a registered Trustee Trainer with the Pensions Authority.

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

- Clodagh Sheehan
- csheehan@accuro.ie
- 021 4350806

Accuro is committed to respecting and protecting your privacy and would like you to feel safe when you give us your personal details.

We will always clearly identify ourselves in correspondence and on our website. Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life & pensions.

To provide you with relevant information, respond to your requests we sometimes request that you provide us with information about yourself. This Privacy Notice will inform you of the information we gather and how it is used. Accuro maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both those methods of data collection and use. Accuro complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data. Our Data Privacy Policy is available on request.

Why do we need to collect and store personal data?

In order for Accuro to provide you with expert advice on a selection of insurance & finance products we need to collect personal data for recommending products which would be adequate to meet your needs. In any event, we 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.

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

We are required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Accuro's aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Why we are processing your data? Our legal basis.

In order for us to provide you with our retirement and financial advice service Accuro needs to collect personal data for this service. Our reason for processing your data under the GDPR is:

- We have your consent.
- We need to process your data to complete the performance of a contract where you, the data subject is the party.
- **Legal basis** - Accuro 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 contract.
- To assist the processing of claims.
- Protect the vital interests of the data subject, including the protection of rights and freedoms.
- Processing that is in the public interest.

In any event, Accuro is committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

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.
- Ensure the personal data is necessary for employment rights or obligations.
- Protect the vital interests of the data subject, including protection of rights and freedoms.
- Necessary for the legitimate activities with appropriate safeguards.
- Personal data made public by the data subject.
- Legal claims.
- Substantial public interest.
- Public health, ensuring appropriate safeguards are in place for the protection of rights and freedoms of the data subject, or professional secrecy.

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Accuro 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 fulfil 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 Accuro 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.

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:

Accuro facilitates 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. Accuro will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body the Central Bank and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Accuro or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Accuro's GDPR representative, Clodagh Sheehan.

Failure to provide further information

If we are collecting your data for a statutory requirement or to fulfil a contract 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

Accuro, as a retirement and financial advisor uses profiling in our 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.

If your data is being processed for the purposes of Life/Serious Illness or Permanent Health Insurance you may be subject to automatic profiling depending on the level of cover requested and age profile. This automatic profiling may result in additional underwriting requirements being sought after.

If you do not wish to be subject to this auto profiling, Accuro can request an individual review of your application.

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 021 4350806 or info@accuro.ie

Privacy policy statement changes

Accuro 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 are aware of any changes. By using our services you agree to this privacy policy.

This privacy policy was last reviewed in May 2018