

Data Privacy Notice

Introduction

Your privacy is important to us. At Simon Shirley Advisors Limited, we take your privacy seriously. It's important that you know exactly what we do with personal information that you and others provide to us, why we gather it and what it means to you. This notice explains the most important aspects of how we use your information and what rights you have under the General Data Protection Regulation (GDPR).

At Simon Shirley Advisors Limited we are committed to:

- Protecting you and your information
- Giving you control
- Being transparent
- Creating value for you

We recommend that you take time to read this notice carefully. If you have any questions about how we use your information, please contact us.

Who we are

Your information is gathered, stored, shared and used by Simon Shirley Advisors Limited. Throughout this document "we" refers to Simon Shirley Advisors Limited.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life, pensions and non-life products, such as deposits and investments. A full list of insurers and product producers with which we deal is available on request.

The information we collect about you

We gather data to identify you, including your contact information, your financial details/financial circumstances, your occupation/employment, your marital status, your health and/or your financial associations, information about you provided by others, information which you have consented to us using and other personal information, such as, information in relation to data access, correction, restriction, deletion, porting requests and complaints.

We collect information directly from clients and, in the case of Employee Benefits, employee data will be collected from employers.

Sometimes we may use your information even though you are not our customer. For example, you may be added to your spouse / partner's / parent's Employee Benefits policy. You may also be a beneficiary of a policy which Simon Shirley Advisors Limited has arranged for a client.

When we collect your information

We collect information you give us which is then shared with third parties in order to arrange financial products i.e. life insurance / pension / investment arrangement or deposit account on your behalf.

How we use your information and the legal basis

We will use and share your data where:

- its use is necessary to arrange products and services on your behalf and perform the provider's contract with you
- its use is necessary for us to comply with a legal or regulatory obligation
- you have agreed or explicitly consented to the use of your data in a specific way (you may withdraw this consent at any time)
- its use is necessary to protect your "vital interests" in exceptional circumstances
- its use is in accordance with our legitimate interests, for example, to manage our business, subject to us not over-riding your interests or fundamental rights and freedoms

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Who we share your information with

When providing our services to you, we can share your information with:

- your authorised representatives, e.g. persons making an enquiry with your approval or a complaint
- third parties (with whom we need to share your information to facilitate placement of financial products you have requested, or those you ask us to share your information with). Your consent will have been provided through signing relevant application forms or, in the case of Employee Benefits, your employer signing the application form.
- service providers who provide us with support services eg. IT provider
- statutory and regulatory bodies, police forces and security organisations, ombudsmen and regulatory authorities
- auditors
- employers

How long we hold your information

As a general rule, we keep your information for a specified period of time from the date of when your contract ceases and/or you cease to be a customer. Typically this period is 6 years, however it may be held for a longer or shorter period depending on a number of factors, including:

- the type of data
- the purpose for which it was collected
- regulatory rules
- the type of product we have provided

Implications of not providing information

If you do not provide your personal information we will not be able to:

- assess suitability and where relevant provide you with a recommendation for a financial product or service
- provide the requested services to you
- continue to provide and/or renew existing services
- We will tell you when we ask for information which is not a contractual requirement or is not needed to comply with our legal obligations.

Website Cookies

The Simon Shirley Advisors website, www.simonshirley.com, uses cookies to improve your experience while you navigate through the website. Out of these, the cookies that are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyse and understand how you use this website. These cookies will be stored in your browser only with your consent. You also have the option to opt-out of these cookies. But opting out of some of these cookies may affect your browsing experience.

Where your information is stored

Your information is stored on systems within Simon Shirley Advisors' premises and with providers of information storage. We may disclose your information to certain categories of recipient which include insurers and investment firms for the purpose of providing products/services to you, 3rd party service providers who assist us in ensuring service to you and our regulators where requested. We do not generally transfer data outside of the EU. In a small number of cases if we are contracted by your employer and they operate in the USA or Canada we may transfer your data to your employer. This transfer of your data would be in order to perform a contract on your behalf in relation to a financial services product, for example, pension contribution details would be supplied to an employer to facilitate group pension deductions for employees.

Profiling – automatic decision making

Risk Profiling:

When assessing the suitability of an investment product, we will gather data in relation to your attitude to risk by way of a questionnaire. This information will be processed using an automated calculator i.e. your answers will be entered and submitted online which will then return a rating which enables us to ensure the suitability of an investment fund.

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Providing Quotations for Financial Services Products:

When providing quotations for life assurance products or recommending pension contribution amounts, we will gather your information, for example, date of birth, salary, and enter the details into an online quotations system.

Data subject rights

We facilitate your 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.

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.

If you wish to exercise any of your data rights, contact us at the details set out below. If you make your request electronically, we will try to provide you with the relevant information electronically.

How to contact us

If you have questions about how we use your information or wish to exercise your information rights, please contact us at:

Simon Shirley Advisors Limited,
64 Lower Mount Street,
Dublin 2
Telephone: 01 6110622
Email: admin@simonshirley.com

You also have the right to complain to the Data Protection Commission or another supervisory authority. Contact the Office of the Data Protection Commission at:

Telephone +353 (0)761 104 800
Lo Call Number 1890 252 231
Fax +353 57 868 4757
Email info@dataprotection.ie

Postal Address Data Protection Commission, Canal House, Station Road,
Portarlington, R32 AP23, Co Laois.

Updates

We will update our Data Privacy Notice from time to time. Any changes will be made available on our website and, where appropriate, notified to you by SMS, post or e-mail.