



Pax Financial Planning Privacy Notice

Who We Are

Pax Financial Planning ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Pax Financial Planning's registered office is at 10 Sandyford Office Park, Sandyford, Dublin 18 and we are a company registered in the Republic of Ireland under company number 50617. We act as the data controller when processing your data. Our designated Data Protection Officer/Appointed Person is Joseph O'Shaughnessy, who can be contacted at 10 Sandyford Office Park, Sandyford, Dublin 18, telephone number is 01-2955766.

Information That We Collect

Pax Financial Planning processes your personal information to meet our legal, statutory and contractual obligations and to provide you with the products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect from you is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- PPS number
- Passport Number
- Driver's License Number
- Special Category Data (*i.e. health/medical information, personal financial information*)

We collect information in the below ways: -

Personal and financial factfinds, application forms across all formats. Adhoc questionnaires i.e medical & financial. Through follow up email or telephone. Preliminary enquiry forms. Through text messaging.

How We Use Your Personal Data (Legal Basis for Processing)

Pax Financial Planning takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below: -

- *We collect your personal data in the performance of a contract or to provide a service and to ensure that orders are completed and can be sent out to your preferred address*
- *We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests*

Your Rights

You have the right to access any personal information that Pax Financial Planning processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object out to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we would be used.

If we receive a request from you to exercise any of the above rights, we will ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement.

Please see the Central Bank register for a full list of agencies held through Pax Financial Planning that we share your personal data with to avail of the best contract available to you at the time.

Also, Pax Financial Planning uses Broker Assist, Wealthtrack, Broker Information Services, ClearChoice & ClearConnections to provide the below services and business functions; however, all processors

acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Broker Assist

We use Broker Assist to streamline and funnel the submission of our business and eliminates the need to utilize several portals for doing same and they act in the capacity of a processor on our behalf. The only information we provide them with is the information provided to meet business and legal requirements.

For more information about Broker Assist, please visit www.brokerassist.ie

Broker Information Services

Broker Information Services is utilized as a customer relationship management system & as a database for collating all of our customer's policies. The only information we provide them with is the information provided to meet business and legal requirements.

For more information about broker information services, please visit <http://www.brokerinformationservices.ie>

Wealthtrack

Wealthtrack is utilized as a customer relationship management system & as a database for collating all of our customer's policies. The only information we provide them with is the information provided to meet business and legal requirements.

For more information about wealthtrack, please visit www.appliedsystems.com

ClearChoice

ClearChoice is a comparison tool & quote engine. They are used to compare price and different policy types. The only information they are provided with are the name, DOB & smoker status.

For more information about ClearChoice, please visit www.clearchoice.ie

ClearConnections

ClearConnections are used to record our inbound and outbound calls. This is done for quality assurance purposes & will also help us fulfil our contractual obligations with you.

For more information about clearconnections, please visit www.clearconnections.ie

Safeguarding Measures

Pax Financial Planning takes your privacy seriously and takes appropriate measures and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, *including*:

We use including but not limited to–

- Industry standard encryptions,

- restricted access so only authorised personnel can access the information,
- IT authentication
- Industry Standard firewalls
- Industry standard anti-virus/malware

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Pax Financial Planning. However, as this information is required for us to provide you with our services, deliver your products and legitimate interests, we will not be able to offer some/all our services without it.

How Long We Keep Your Data

Pax Financial Planning only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under the Irish CPC to keep your basic personal data (*name, address, contact details*) for a minimum of 6 years after which time will be destroyed unless there is a legitimate or legal reason for keeping the data.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Special Categories Data

Owing to the products, services or treatments that we offer, Pax Financial Planning sometimes needs to process sensitive personal information (*known as special category data*) about you, the collection of personal medical information and historical and personal financial information to process applications with companies whom we hold agencies with on your behalf. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through a signature. You can modify or withdraw consent at any time, which we will act on appropriately and complete the task within a calendar month, unless there is a legitimate reason for not doing so.

If you explicitly consent to us collecting and using your health/medical/ data for the purposes stated above, please sign below and print your name: -

LEGITIMATE INTERESTS

Pax Financial Planning will occasionally send you contact you by [email/telephone with services that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and you will always have the option to opt-out/unsubscribe at any time.

Lodging A Complaint

Pax Financial Planning only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Office of the Data Protection Commissioner
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