

Privacy Notice

This Privacy Notice is effective June 2022

1. Who are we?

Peak Financial Limited ('we', 'us' or 'our') is a Data Controller within the meaning of the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988-2018. We know your personal information is important to you and it is also important to us. We have measures in place to protect and ensure the security of your personal data.

This Privacy Notice tells you how and why we obtain your personal information and what we use it for. It also explains your rights with respect to the personal information we may hold about you.

Please read this Privacy Notice. If you give us personal information about someone else, please make sure you have their permission and please make them aware of this Privacy Notice, as it also applies to them.

2. How to contact us?

Our business address is: First Floor, 20 Molesworth St, Dublin D02 T250

Our email address for data protection queries is info@peakfinancial.ie

Our telephone No: + 353 87 6108705

3. What personal information do we collect?

We collect information:

- (i) you give us;
- (ii) information generated during the provision of our services and;
- (iii) information provided to us by third parties (but only where it relates to our provision of services to you or a related party such as a spouse).

Types of information we may collect or hold about you include:

- Identity details such as your name, address, date of birth and contact details;
- Your insurance policy and claims history/investment products/pension information, etc.;
- Financial information such as bank account details; and
- Other information required for administering insurance, investment, pension and mortgage contracts.

Cookies:

We also collect data on website usage when you visit www.peakfinancial.ie including through the use of cookies. Cookies are small data files that are transferred to your computer's hard drive through your web browser to enable us to recognise your browser. Like most entities, we may gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. We may gather technical information for security reasons. We will make no attempt to identify individual visitors, or to associate the technical details available to us with any individual. We will only use the technical information for statistical and other administrative purposes.



We may collect this technical information from you when you visit our website and accept cookies. When you visit our website for the first time you will be requested to confirm if you do or do not consent to this use of cookies. Full details of the cookies we use are available in our Cookies Policy available on our website at www.peakfinancial.ie/cookies

4. Why do we collect this information?

Our principal business is to provide access to pension, investment, insurance and mortgage products and associated services for our clients. All personal data we collect is to assist us in providing these services. The legal basis for processing that we rely upon varies depending on the purpose but includes the following:

Contract:

Personal information about individuals is needed by us to:

- set up payments for premia
- manage the customer relationship
- manage insurance policies/investment plans/financial planning/mortgage applications and provide access to claims/redemption/transfer processes
- set up access to third party providers of services available for specific products/services

Required by law:

We use your personal information to comply with law and regulations for example:

- reporting to regulators or other authorities
- keeping proper books and records
- Internal reporting, quality checking, compliance testing and audits to help meet our legal obligations.

The type of personal information that is required to be processed by law depends on the type of service we provide.

Legitimate interest:

We use your personal information for our legitimate interests as shown below. We have taken account of any privacy risks and ensured that your data protection rights are not affected. We believe these uses benefit our customers.

- Safety and Security: We capture and hold data from email, web and network traffic to monitor and protect information security and to support investigation around cyber or data loss events (e.g. a malicious act – virus or hacking).

Consent:

You need to give consent for us to collect and use personal information classed as sensitive of for us to process your information for certain purposes. You are given the choice to provide consent, or not. If we process your personal information based on consent, you have the right to withdraw that consent at any time. The opt-out methods will depend on how the consent was collected and will be explained when you give us your consent, e.g. by disabling cookies on your browser.

- **Cookies:** Our website uses cookies which means that certain data may be recorded when you visit our website. We will ask for your consent to use these once you visit the website and details of the cookies we use are available in our Cookies Policy.
- **Marketing:** We would like to send you information on the services we can offer from time to time. We will only send this information to you where we have documented your consent or you have opted in via our website to receive this type of information.

5. Who do we share this information with?

Our principal business is to provide financial planning services to clients and facilitating access to insurance, investment and mortgage products and associated services for our clients. This often involves sharing data with relevant third parties as follows:

Data Processors:

Companies that act as service providers under contract with us and only process and store your personal information as instructed by us. Your personal information is transferred and held securely and is not used by other parties for any other reason. The categories of services that we use other Data Processors for include: document management, IT services, administration, customer services and screening.

Insurance Companies:

We provide your information to the insurer which underwrites your insurance product and/or insurers to whom you request us to seek a quotation from and/or make an application to.

Mortgage providers:

We provide your information to the lenders to whom you wish to make an application for a mortgage.

Pension/investment providers:

We provide your information to the financial services providers who provide or administer your pension/investment product(s).

Regulators:

Regulators, including the Central Bank of Ireland, and legal authorities such as the Revenue Commissioners where required to comply with regulations and laws.

Compliance Services/Auditors:

We will share data with appointed 3rd party service providers in order to carry out compliance reviews and/or audits of our business activities.

6. Do we send your information outside of the EU?

We mostly process the personal information we collect in Ireland however data that we hold may be stored outside of the EU, particularly in the UK which is no longer a member of the EU. For processors that we use who store this data on our behalf outside of the EU, we take steps to ensure that your personal information is adequately protected and transferred in line with data protection law.

Passing your personal information to certain countries including the UK is permissible on the basis of



an adequacy decision by the European Commission which ensures that your data privacy rights have equivalent protection.

7. How long do we hold this information for?

We keep and use your personal information for as long as you are availing of services with us. We are also required to hold it after this where we have legal obligations to do so. We generally hold your information for period of 6 years after you cease to avail of our services in line with legal and regulatory obligations.

8. What are your rights with respect to your personal information?

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details at the beginning of this Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month. Any restrictions that may apply to your rights will be explained in our response.

Right to Information

You have a right to the information set out in this Privacy Notice. The most recent version of our Privacy Notice will always be accessible on our website at www.peakfinancial.ie/privacy

If we make changes to the type of personal information we collect and / or how we use it, we will inform you of the changes. We have controls in place to protect your personal information and minimise the risk of security breaches, however, should any breaches result in a high risk for you, we will inform you without undue delay.

Right to Restrict or Object

You can restrict our processing of or object to any unfair and unlawful collection or use of your personal information. You can object to any automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person. Where you have previously provided consent, you can withdraw it at any time.

Right to Rectify

You can ask us to correct and/or update personal information we hold about you. To provide you with the best service it is important we have your up-to-date personal information such as contact details.

Right to be Forgotten

You can have your personal information deleted if it is incorrect or has been processed unfairly or unlawfully. If you have withdrawn consent you can ask for your personal information to be deleted. We will keep a record of your request so we know why your personal information was deleted.

If we have provided a regulated product or service to you, we must keep your personal information for a minimum period by law.

Right to Access

You have the right to know what personal information we hold about you and to receive a copy of your personal information. Please note this right does not allow you access to personal information about any other person. Where you make a data access request to us, we must tell you:

- why we hold it,
- who we pass it to, including whether we transfer it outside the EU,

- how long we keep it for,
- where we got it from; and
- if we carried out any automated-decisions, and if so, the logic behind it and what it means for you.

To access your personal information please write to us or email us using the contact details at the beginning of this Privacy Notice. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information or types of documents.

Right to Portability

You can ask for a copy of all personal information that you gave us (including through your interactions with us), and which we hold in an automated format. You can receive this in a machine-readable format that allows you to keep it.

You may also request us to send this personal information in a machine-readable format to another company. The format will depend on our ability to provide this in a secure way that protects your personal information.

9. Data Privacy Complaints

If you do not think that we have processed your personal information in line with this Privacy Notice, please contact us. If you are not happy with how we have processed your personal information or handled your privacy rights, you can also complain to the Data Protection Commission by contacting them below:

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland
+353 (0) 761 104 800 / +353 (0) 57 868 4800
info@dataprotection.ie