

PRIVACY NOTICE

Financial Equality Services Limited 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. For the purposes of the GDPR the data controller is Financial Equality Services Limited. Our contact details are detailed below.

When we refer to we/us, we mean Financial Equality Services Limited.

Please read this Privacy Notice 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?

For more information about who we are and what we do, please visit the Financial Equality Services Limited – www.feservices.ie.

Our GDPR Owner can be contacted directly here:

- Financial Equality Services Limited
- Email address info@feservices.ie
- Phone number 01 5767513

How do we collect your information and what information do we collect?

The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data.

Our organisation collects personal data in the following ways, if you:

- request a service from us.
- use our website/apps and it installs cookies or other tracking technologies onto your device.
- engage with us on social media via LinkedIn or Instagram.
- contact us with a complaint or query.
- apply for a position with us.

What information do we collect?

The information we collect about you includes the following:

1. **Contact and Identifying information**, e.g., name, address, contact details; email, mobile, landline
2. **Unique identifiers e.g.**
 - PPS number
 - pension scheme reference number
 - insurance policy numbers
3. **Demographic details**, age, gender, marital status, lifestyle, and insurance requirements; date of birth, dependents, photo ID, as well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. E.g., your children/spouse
4. **Family and Beneficiary Data**, e.g., dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant.
5. **Employment information** e.g., role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history.
6. **Publicly available sources**: e.g., Information about you in the public domain such as Director information from the Companies Registration Office.
7. **Health information** such as information about your health status, medical records, and medical assessment

outcomes; We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol), medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information.

8. **Pensions and Insurance Benefits information** such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, PAO.
9. **Financial details** e.g., bank account details, details of your credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details.
10. **Claims Data** (From you and any relevant third parties).
11. **Marketing preferences:** we will only send you direct marketing if you explicitly consent.
12. **Online information:** e.g., information about your visits to our websites.
13. **Social media information** (e.g., likes and posts) with our social media presence; this includes LinkedIn and Instagram.

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

Information we automatically collect

We sometimes automatically collect certain types of information when you visit our websites and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your expressed consent. Further information about our use of cookies can be found in our [Cookie Notice](#) at the footer of our web page. www.feservices.ie

How and why, we process personal data?

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for mortgage, insurance, investment, protection, pension products, independent financial advice, quotes.

Legal Basis	Nature of Processing and Purposes	Categories of Personal Data
<p>Performance of a Contract</p> <p>It is necessary to process your Personal Data in order to perform the agreed level of service to you under your contract with FE services Ltd.</p> <p>IMPORTANT: it is a contractual requirement for us to collect your Personal Data. In the event that you do not provide us with your Personal Data for the purposes set out here, we will not be able to provide you with the products or services requested.</p>	<ul style="list-style-type: none"> • To establish your eligibility for products and services; • To process your application for products and services; • To determine, agree, document, perform and execute the terms on which we will be performing the agreed level of service under the contract; • To assess the suitability of a product or service for your specific risk profile or needs; • To send you communications which form part of the service we provide (e.g. investment market performance updates, economic updates, etc.); • To contact you by post, phone, text message, email, but not in a way contrary to your instructions to us or contrary to law; • To monitor and keep a record of our conversations when we speak on the phone. 	<ul style="list-style-type: none"> • Identity & Contact Data • Financial & Account Data

Legal Basis	Nature of Processing and Purposes	Categories of Personal Data
<p>Legitimate Interests</p> <p>Depending on our business needs, it is necessary to process your Personal Data where we have legitimate business interests to do so.</p> <p>IMPORTANT: Before we process your Personal Data to pursue our legitimate interests for the above purposes, we determine if such processing is necessary and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. On balance, we have determined that such processing is necessary for our legitimate interests and that the processing which we conduct does not adversely impact on these rights and freedoms.</p>	<ul style="list-style-type: none"> • To administer your client or potential client relationship with us; • To provide service information, to improve our service quality and for training purposes; • To compile and process information for statistical or research purposes to help us better understand trends in our client behavior and to understand our risks better, including for providing management information, operational and data risk management; • To improve our website. • To understand our clients' needs and preferences. • To conduct client satisfaction surveys; • To manage and respond to a complaint or appeal; 	<ul style="list-style-type: none"> • Identity & Contact Data • Financial & Account Data • IT Data
<p>Compliance with Legal and Regulatory Obligations</p> <p>It is necessary for us to collect and process your Personal Data in order to comply with the legal and regulatory obligations imposed on us under Irish, European Union, or other applicable laws (as implemented or amended from time to time), including in the field of anti-money laundering requirements.</p>	<p>To comply with Irish, European Union and other applicable laws namely (but not limited to):</p> <ul style="list-style-type: none"> • Criminal Justice (Money Laundering and Terrorist Financing) Acts 2010 – 2018; • Client Asset Regulations; • Consumer Protection Code 2012; • Markets in Financial Instruments Directive II (and associated MiFID II Regulations); • Irish and European Union tax law (e.g. Taxes Consolidation Acts); • US Foreign Account Tax Compliance Act; • GDPR and Irish Data Protection Acts 1988 to 2018; and UK GDPR and Data Protection Act 2018; and • Other applicable laws to which we may be subject. 	<ul style="list-style-type: none"> • Identity & Contact Data • Financial & Account Data • Criminal Convictions Data
<p>Consent</p> <p>We rely on consent as a legal basis for processing your Personal Data only in certain limited circumstances.</p> <p>We will only process your Health Data with your explicit consent.</p> <p>Where we conduct any direct marketing activities we will obtain your consent.</p> <p>You have the right to withdraw your consent by contacting us at any time.</p>	<ul style="list-style-type: none"> • To be able to onboard you for specific financial products requiring a health assessment; 	<ul style="list-style-type: none"> • Health Data • Marketing & Communications Data

Legal Basis	Nature of Processing and Purposes	Categories of Personal Data
<p>To Defend Legal Claims</p> <p>It is necessary for us to collect and process your Personal Data to investigate, establish, exercise or defend legal claims.</p>	<ul style="list-style-type: none"> • To file legal proceedings; • To investigate, establish, exercise or defend a legal claim; and • To settle legal claims. 	<ul style="list-style-type: none"> • All Data

If you require further information on any of the above basis for processing your data, we can provide you with further details.

How we share your data

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements.

1. **Insurance Partners** where we need to manage the services provided to you such as Product Providers and insurance underwriters, and reinsurers.
2. **EU Law enforcement bodies**, when required to do so by law and/or regulation, or another legal request.
3. Public authorities, regulators and government bodies, where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity;
4. **Third-party processors:** We outsource our processing operations to suppliers that process personal information on our behalf. Examples include IT service providers who manage our IT and back-office systems and telecommunications networks, and accounting and payroll providers, CRM providers. These processing operations remain under our control, and we have data processing agreements in place with all our third-party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.
5. **Internal and external auditors** where necessary for the conduct of company audits or to investigate a complaint or security threat.
6. On the sale or reorganisation of our business whether by asset or share disposal or other transaction relating to our business.

Security

The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

Retention

Financial Equality Services Limited shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

Financial Equality Services Limited may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

The retention period for each category of personal data will be set out in our [Retention Schedule](#). This is available on request, along with the criteria used to determine this period, including any statutory obligations we have. Should you require further information we would be happy to provide.

Personal data will be disposed of securely.

Data Subjects Rights:

Financial Equality Services Limited will 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. (The erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).
- **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.**
- **Right to make a complaint:** if we refuse your request under rights of access, we will provide you with a reason as to why.

All 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.

Complaints

If you wish to make a complaint about how your personal data is being processed by Financial Equality Services Limited or how your complaint has been handled, you have the right to lodge a complaint with our GDPR Owner.

You may also lodge a complaint with the Data Protection Commission (DPC) in Ireland, whose details are:

Data Protection Commission
21 Fitzwilliam Square South,
Dublin 2.
D02RD28

Web: <http://www.dataprotection.ie/>

Email: info@dataprotection.ie

See website for updated contact details to reach the appropriate section within the DPC.

Failure to provide further information.

If we are collecting your data for a contract and you cannot provide this data, the consequences of this could mean the contract cannot be completed or details are incorrect. When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

Special Categories of personal data

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health and financial data, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for assurance, investment, pension and mortgage purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

- a policy of insurance or life assurance,
- an occupational pension, a retirement annuity contract or any other pension arrangement
- the mortgaging of a property



Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on email info@feservices.ie

Privacy notice/ statement changes

When we update this Privacy Notice/Statement, we will post a revised version online. Changes will be effective from the point at which they are posted. We would encourage you to review our Privacy Notice so that you are aware of updates.