



TierOne Prudential Limited Data Privacy Summary

At TierOne Prudential Limited, we take privacy seriously. It is 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 document is being provided to you in line with our obligations under the General Data Protection Regulation (GDPR) which comes into force on the 25th May 2018. From that date, the GDPR, together with applicable Irish requirements will amend existing data protection law and place enhanced accountability and transparency obligations on organisations when using your information. The GDPR will also introduce changes which will give you greater control over your personal information where processing is carried out for our business purposes.

Please take time to read this notice carefully, if you are under 16 years of age, please read this summary with a parent or guardian and ensure you understand it. If you have any questions about how we use your information, please contact our Data Protection Officer.

This summary explains the most important aspects of how we use your information and what rights you have in relation to your personal information. You can get more detailed information by mailing info@tierone.ie

1. Who we are

Throughout this document, “we”, “us”, “our”, and “ours” refers TierOne Prudential Limited. Your information is held by TierOne Prudential Limited.

2. The information we collect about you.

We will hold:

- Data to identify you
- Your Financial details and financial circumstances on an application form including but not limited to medical information
- Your marital status
- Your Financial Associations
- Information about you provided by others e.g. joint policy or investment applications
- Information that you have consented to us using
- Other personal information such as telephone recordings or accounts on same and information provided when exercising your rights under section 10 below
- Notes on details you have provided us by phone or in person

Sometimes we may use your information even though you are not a customer of ours. For example, you may be a beneficiary, guarantor, director, cardholder or representative of a customer of ours or be a potential customer applying for one of our products or services

3. When we collect your information

We collect information: (1) you give us; (2) information from use of our products, services or our website, and; (3) information provided to us by third parties.

4. How we use your information and the legal basis.



We use, and share, your data where:

- You have agreed or explicitly consented to the using of your data in a specific way (you may withdraw your consent at any time)
- Use is necessary in relation to a service or a contract that you have entered into, for example, to provide you with insurance services when you take out a policy or because you have asked for something to be done so that you can enter into a contract with us (e.g. you have asked us for advice or a quote when you apply to us for insurance)
- Use is necessary because we must comply with a legal obligation (e.g. complying with our “know your client” obligations and reporting to the Central Bank of Ireland and law enforcement)
- Use for our legitimate interests (which you may object to or opt to decline) such as managing our business including providing service information, conducting marketing activities, training and quality assurance, portfolio advice and strategic planning for retirement benefits

5. **How we use automated processing or “analytics”**

We may analyse your information using automated means to:

- Help us understand your needs and develop our relationship with you
- To help us offer you products and service information we believe will be of interest to you
- To make assessments/recommendations where you apply for a financial product. The types and sources of the information we process by automated means about you are listed above in Sections 2 and 3

We also use automated processing to assist in compliance with our legal obligations in connection with prevention of money laundering, fraud and terrorist financing, for example to screen for suspicious transactions

6. **Who we share your information with**

- When providing our services to you, we may share your information with:
- Your authorised representatives
- Third parties with whom: (1) we need to share your information to facilitate transactions you have requested, and (2) you ask us to share your information
- Service providers who provide us with support services
- Statutory and regulatory bodies (including central and local government) and law enforcement authorities
- Third parties in connection with the sale or purchase of investment assets by us: persons making an enquiry or complaint, advice agencies and other regulated intermediaries, receivers, liquidators, examiners, official assignee for bankruptcy and equivalent in other jurisdictions including court orders
- Pension fund administrators, trustees of collective investment undertakings and pensions trustees, insurers and product producers. Healthcare professionals and medical consultants.
- Business or joint venture partners

7. **How long we hold your data**

How long we hold your data for is subject to legislation and regulatory rules we must follow, set by authorities such as the Central Bank of Ireland and the type of financial product provided to you.



8. Implications of not providing your data

If you do not provide information we may not be able to:

- Provide requested products or services to you.
- To continue to provide and/or renew existing products or services.
- Assess suitability for product/service recommendations.

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

9. How to exercise your information rights including the right to object

From the 25th May 2018, you will have several enhanced rights in relation to how we use your information, including the right, without undue delay, to;

- Find out if we use your information, access your information and receive copies of your information
- Have inaccurate/incomplete information corrected and updated
- Object to particular use of your personal data for our legitimate business interests or direct marketing purposes
- In certain circumstances, to have your information deleted or our use of your data restricted
- In certain circumstances, a right not to be subject to solely automated decisions and where we make such automated decisions, a right to have a person review the decision
- Exercise the right to data portability (i.e. obtain a transferable copy of your information we hold to transfer to another provider)
- To withdraw consent at any time where processing is based on consent.

If you wish to exercise any of your data rights, you can contact us at TierOne Prudential Limited, Unit 1, Leopardstown Golf Centre, Brighton Road, Foxrock, D18 F702. or by phone at 01-6624498 Email: info@tierone.ie

If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests) we may extend this period by a further two calendar months and shall explain the reason why. If you make your request electronically, we will try to provide you with the relevant information electronically.

You also have the right to complain to the Data Protection Commission or another supervisory authority.

Telephone: +353 (0)761 104 800 or Lo Call 1890 252 231 Fax: +353 57 868 4757

E-mail: info@dataprotection.ie

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

10. How to contact us and/or our Data Protection GDPR owner

If you have any questions about how we use your information, you can reach Brian Coghlan at TierOne Prudential Limited, Unit 1, Leopardstown Golf Centre, Brighton Road, Foxrock, D18 F702 or by phone at 01-624498

11. We will update our Data Privacy Notice from time to time

Any updates will be made available and where appropriate notified to you by SMS or e-mail