

TAB Financial Services Ltd Data Protection & Privacy Statement

Introduction

TAB Financial Services Ltd is committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show that we are accountable with the EU General Data Protection Regulation (GDPR) in relation to not only processing your data but ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of TAB Financial Services Ltd in relation to the information we collect about you.

For the purposes of the GDPR data controller is:

- TAB Financial Services Ltd. A person or entity who controls the contents and use of personal data.
- Contact details of TAB Financial Services Ltd:

34 Fitzwilliam Place, Dublin 2, Rep. of Ireland.
Ph: +353 (1) 676 8633
E-mail: natalie@tab.ie
- When we refer to 'we' it is TAB Financial Services Ltd.

Please read this Statement 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?

TAB Financial Services Limited is regulated by the Central Bank of Ireland as an Insurance Intermediary registered under the European Communities (Insurance Mediation Directive) Regulations, 2005, and as an Investment Intermediary authorised under the Investment Intermediaries Act, 1995. We are a member of the Brokers Ireland and Financial Broker.

TAB Financial Services Ltd is an impartial financial services company operating in the Republic of Ireland for over 25 years. Our principal business is to provide expert financial advice and arrange transactions in relation to pensions, life assurance, investments, inheritance tax and financial planning. A full list of insurers or product providers with which we deal with is available on request.

As a long established financial services company TAB offer wide choice and wealth of experience in all aspects of financial planning. Our expert advice can make a real difference to individuals and companies.

We are also co-authors to the annual publication of *TAB Guide to Money, Pensions & Tax*. This publication explains in plain English all aspects of your finances, social welfare, tax, pensions and much more, adjusted to the latest Budget, Finance Bill and other legislature.

Our Data Protection Officer and data protection representatives can be contacted directly here:

- Jane Topkin
E-mail: jane@tab.ie
Ph: +353 (1) 676 8633

Purpose for processing your data

To provide you with relevant information, respond to your requests we sometimes request that you provide us with information about yourself.

TAB Financial Services Ltd would like you to feel safe when you give us your personal details. We will always clearly identify ourselves in correspondence and on our website. Our principal business is to provide

This Privacy Notice will inform you of the information we gather and how it is used. TAB Financial Services Ltd maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both those methods of data collection and use. TAB Financial Services Ltd complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data. Our Data Privacy Policy is available on request.

Why we are processing your data? Our legal basis.

In order for us to provide you with expert financial advice and arrange transactions on your behalf in relation to pensions, life assurance, investments, inheritance tax and financial planning, we need to collect personal data for arranging this. Our lawful reason for processing your data under the GDPR is:

- Legal basis – TAB Financial Services Ltd needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract.

In any event, TAB Financial Services Ltd are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

How will TAB Financial Services Ltd use the personal data it collects about me?

TAB Financial Services Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's GDPR. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

When we collect information about you, we intend to tell you why we are asking for the information and what we intend to do with it. You will have the option of not providing the information, in which case you may still be able to access other parts of this website, although you may not be able to access certain services. In certain areas of our website, we may, where appropriate, enable you to 'opt in' to certain uses of your information e.g. personal data and direct marketing. Data will not be held for longer than is necessary, credit card transactions will be held for the duration of the transaction and general client details will be held while you are a customer.

The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to verify your identity, send you information or contact you in relation to a TAB Financial Services Ltd product or service that you are using or that we believe may be of interest to you after you have chosen to 'Opt in'.

Special Categories of personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data) – we will ensure the following:

- We will obtain your explicit consent.

What information we gather

In general, you may visit our website without identifying yourself or revealing any personal information. TAB Financial Services Ltd collects domain information from your visit to customise and improve your experience on our website.

This website may collect certain information from your visit, including the date and time of your access, the pages you have accessed, the name of the Internet Service Provider and the Internet Protocol (IP) address by which you are accessing the Internet, and the Internet address from which you linked to our site, if applicable. We use this information to better understand how our website is being used so that we can improve its performance.

Some portions of this website may request that you give us information about yourself, from which we are able to identify you, such as your name, e-mail or other address. Some of the ways in which we may collect information from you are:

- Subscription to newsletters or other TAB Financial Services Ltd content-related correspondence.
- Event registrations for seminars, conferences, etc.
- White paper or other downloads.

Data security

TAB Financial Services Ltd's intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect online, including the use of encryption when collecting or transferring sensitive data such as credit card information.

However, you should always take into consideration that the internet is an open forum and that data may flow across networks with little or no security measures, and therefore such information may be accessed by people other than those you intended to access it.

Who are we sharing your data with?

In certain instances, 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 with information that is necessary for them to perform the services and we take measures to protect your information.

The information we collect may be used, stored and processed in the EU, UK or in any other country in which TAB Financial Services Ltd does business. By providing the information via the website, you are consenting to the transfer of the information outside of your country to any country (including countries which may not have adequate levels of protection).

TAB Financial Services Ltd may disclose information it has collected about you on the website if required to do so by law or when necessary to protect the rights of TAB Financial Services Ltd or its employees.

We may pass your personal data on to third-party service providers contracted to TAB Financial Services Ltd in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with their procedures.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

The third parties that we may pass your personal data to are those insurers or product providers with which we have an agency agreement in place with. A full list of these providers is available on request.

We have issued all our third-party processors with a Data Processor checklist asking them GDPR specific questions.

If we transfer personal data to a third party or in the unlikely event outside the EU, we as the data controller will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available.

Business Relationships

This website contains links to other websites. TAB Financial Services Ltd is not responsible for the privacy practices or the content of such websites. TAB Financial Services Ltd uses pixels, transparent GIF files and other methods to help manage online advertising.

Data Subjects Rights

We facilitate you, our clients, 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.
- **Right to judicial review:** in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why.

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.

Additional information we are providing you with to ensure we are transparent and fair with our processing

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. TAB Financial Services Ltd will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body the Central Bank of Ireland and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by TAB Financial Services Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and TAB Financial Services Ltd Data Protection Officer.

Failure to provide further information

If we are collecting your data for a contract x and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

Profiling – automatic decision making

- **Risk Profiling**

To establish a customer's attitude to investment risk (relates to pensions, investments and savings) TAB Financial Services Ltd have automated calculators which calculate your attitude to various levels of risk having answered a series of questions.

- **Profiling for marketing purposes.**

When we seek to contact you about other services, as outlined above we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

- **Establishing affordability and providing quotations for financial services products.**

Additional Processing

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on +353 (1) 676 8633 or e-mail jane@tab.ie.

Privacy policy statement changes

TAB Financial Services Ltd may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services you agree to this privacy policy.

This privacy statement was last reviewed on 23 May 2018.