

Privacy Notice

Last Updated 25 May 2018

Who We Are:

Michael Kiernan t/a MyAdviser (referred to in this document as MyAdviser), is a financial services brokerage, providing lifestyle financial planning services including financial advice services and a range of best in breed solutions in the areas of pensions, approved retirement funds, legacy planning, family and business protection, savings and investments. MyAdviser is owned and managed by Michael Kiernan who is a Qualified Financial Advisor (QFA) and holds a BSc. Mgmt. and MA. MyAdviser registered office is located at 11 Anglesea House, 63 Carysfort Avenue, Blackrock, Co. Dublin, A94 X792. Our website address is <http://www.myadviser.ie>; phone 01-90 10 464 or email info@myadviser.ie.

Privacy Notice

MyAdviser is committed to respecting and protecting your privacy and 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 lifestyle financial planning services including advice services and a range of best in breed solutions in the areas of pensions, approved retirement funds, legacy planning, family and business protection, savings and investments.

To provide you with relevant information, respond to your enquiries and requests for products and/or services we sometimes request that you provide us with information about yourself and your circumstances. This Privacy Notice will inform you of the information we gather and how it is used. We take this privileged position very seriously and have always acted in our client's best interest.

MyAdviser 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. MyAdviser complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data.

You may visit our website without identifying yourself or revealing any personal information. MyAdviser may collect 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 may use this information to better understand how our website is being used so that we can improve its performance.

For the purposes of the GDPR the data controller is:

- Michael Kiernan
- Contact details are michaelk@myadviser.ie and 01-90 10 463

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.

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

- Online request forms submitted through our website
- Direct emails and during phone calls where clients and potential clients provide us information about their needs.
- Financial questionnaires where detailed questions are answered to provide MyAdviser with necessary data to provide advice services and solutions.
- Follow-up phone, email and other interactions also may gather information about the client.
- 3rd party providers application and other forms required to apply for recommended solutions.
- The need to provide identification for money laundering purposes, including photo ID and address ID are also ways we gather personal data on clients.

Use of the Information We Gather/Purpose Why We are Processing Your Information

Generally, we may collect your data for one or more of five reasons based on below;

- 1) To respond to your request(s) for advice or products or queries in relation to same.
- 2) Reviewing your financial position and planning needs including possible solutions as is prudent or required.
- 3) To recommend products that protect your lifestyle e.g. protecting your family (including mortgage) in the event of death or illness.
- 4) Planning your financial future e.g. retirement funding, savings and investment options.
- 5) Project your future using financial software to help manage it.

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 will still be able to access other parts of our 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, if applicable credit card transactions will be held for the duration of the transaction and general client details will be held while you are a customer. Our Regulator, The Central Bank of Ireland, requires that where clients have products with us that we maintain their data for six years after the last product expires or is cancelled. This includes all communication around and associated with the product. MyAdviser deems it appropriate to also hold data associated with the provision of advisory services even if there is no product solution connected to it. We will delete this data after 6 years if no further services have been provided.

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 MyAdviser 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 obtain your explicit consent. The main area where Health Data is gathered is while applying for protection policies including Life Assurance, Serious Illness Protection, Income Protection and Business Protection. This data will be kept by MyAdviser as a record of the application and the third party provider will also hold the application documents and data. See section below re third parties.

Sharing Information with Third Parties.

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 to clients. You can view the list of product providers we hold agencies with via the Central Banks website

<http://registers.centralbank.ie/FirmRegisterDataPage.aspx?firmReferenceNumber=C11223®ister=1>.

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 vast majority of the data provided is contained in the application form(s) necessary to execute solutions and clients will sign off or review all of them before their submission.

The information we collect may be used, stored and processed in the EU, UK, United States, Switzerland or in any country in which MyAdviser or the Third Parties we deal with for clients does business. We will always try to process data within the EU and UK, but we cannot guarantee that data is not stored securely outside of these areas, mainly due to the range of providers/third parties that we use to support client's financial plans.

MyAdviser may disclose information it has collected about you if required to do so by law or when necessary to protect the rights of MyAdviser or its employees. We have issued all our third-party processors with a Data Processor checklist asking them GDPR specific questions.

Data Subjects Rights:

MyAdviser will 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:** if Organisation Name refuses 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.

Data Security.

MyAdviser'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 where appropriate.

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.

How to Update and/or Amend the Personal Information you have Provided.

You are entitled to know whether we hold information about you and, if we do (subject to certain limitations), to have access to that information and have it corrected if it is inaccurate or out of date. To exercise your Right of Access or to update your details under your Right of Rectification or Erasure please email your request to the contact address below with proof of identity.

Complaints

If you wish to make a complaint about how your personal data is being processed by MyAdviser or how your complaint has been handled, you have the right to lodge a complaint directly with the data supervisory authority and /or our Data Protection Officer, Michael Kiernan (01-90 10 463, michaelk@myadviser.ie)

To access the complaints section of the Data Commissioner website use this link <https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-commissioner/r/18.htm> , or email Data Protection Commissioner at info@dataprotection.ie .

Failure to Provide Further Information

If we are collecting your data for a contract (e.g. life assurance policy or pension) and you cannot provide this data, the consequences of this could mean the contract cannot be completed or details are incorrect. In terms of providing financial planning support we require detailed information on your circumstances and will inform you of any missing data needed. If you cannot provide this data, we may not be able to provide you the service requested.

Profiling – Automatic Decision Making

The main categories are

- a) Risk & Reward Profiling.
- b) Profiling for Marketing Purposes.
- c) Establishing Affordability and Providing Quotations for Financial Services.

We will now cover each area in more detail.

Risk & Reward Profiling

To establish a customer's attitude to investment risk and reward (relates to pensions and investments) advisors have automated calculators which calculate the customer's attitude to various levels of risk having answered a series of questions. This profiling is a tool we use but it is not the only ingredient in determining a client's risk & reward profile. MyAdviser also incorporates the client's other relevant data including their full investment experience.

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

We always check the client's ability to afford any recommended solution before we make that recommendation. If there are any concerns, we share them with the client as part of the overall advice.

Business Relationships

MyAdviser's website may contain links to other websites. MyAdviser is not responsible for the privacy practices or the content of such websites. MyAdviser does not allow any advertising on its site.

Contacting Us

If you have any questions or comments about our privacy notice or practices, please contact us. MyAdviser may modify or update this privacy notice from time to time, at any time without prior notice. You can check the "Last Updated" date at the start of this document to see when the notice was last changed. We encourage you to check this notice often so that you can continue to be aware of how we are protecting your personal information. Your continued use of the MyAdviser website and using MyAdviser services constitutes your consent to the contents of this privacy notice, as it may be modified from time to time.

Phone: 01-90 10 464

Email: info@myadviser.ie