

## Data Privacy Notice

Acumen & Trust DAC is committed to respecting and protecting clients privacy and would like all its clients to feel safe when providing us with their personal details. We will always clearly identify ourselves in correspondence and on our website.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to corporate pension and risk schemes, trusteeship, individual and corporate deposits, tax, unit trust type investments, tracker bonds, shares or bonds listed on a stock exchange, insurance policies and personal retirement savings accounts. These include life assurance policies, specified serious illness and other protection type policies, pension products (including small self-administered pension schemes) and savings and investment life assurance policies. We also provide advice on health insurance.

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

This Privacy Notice will inform you of the information we gather and how it is used. Acumen & Trust DAC 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. Acumen & Trust DAC 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 Gather Information?

As a client of Acumen & Trust, we process personal information and we do this for a number of specific reasons, principally:

- so as to deliver to you the service we have been engaged to provide
- in order to meet statutory obligations and other tax and regulatory requirements which we are subject to, and
- in order to provide you with information in relation to our other services.

### What Information we gather

For ongoing provision of services, the type of personal information held on the records of Acumen & Trust DAC may include the following:

- Personal Details - including date of birth, gender, and marital status;
- Contact Details - such as name, title, personal address, work and personal telephone numbers, and personal email;

- Income Details - this may include basic salary, overtime, bonuses and details of any other earnings / income;
- Employment History – we may need to hold your date(s) of joining and leaving, and prior remuneration history;
- Personal Identification Number- this may include your PPS number, or another unique identifier number provided by you or your employer;
- Bank Account Details – where required to facilitate payments into and out of accounts
- Your General Financial Circumstances – in order to provide a financial review, we may hold information on all your assets, and liabilities;
- Pension Details – we may hold details of both current and prior pension scheme benefits;
- Medical Information – we may need to hold information in order to secure risk benefits. If so, this information will be held by us for the required period of time as set out in our Data Retention Schedule;
- Identification – we may be required to hold ID (such as photo ID for Anti Money Laundering regulations), or copies of birth / marriage certificates (for example when a maturity / pension benefit is due for payment);
- Information about you provided by others e.g. your spouse/partner, professional advisors, etc.

Sometimes we may use your information even though you are not our customer. For example, you may be a beneficiary under a trust, a director of a client company, an employee of a client, a member of your employer's pension scheme, or be a potential customer applying for one of our products or services.

### **When we collect your Information**

We gather information in advance or when we initially meet individual clients. Information is also provided to us in the form of application forms, transaction records, email and written correspondence, information provided via telephone, and via the online use of our website. We aim to update this information, whenever you require a further service or product, or whenever you advise us of a change in your circumstances.

For corporate pension and corporate risk scheme members, information is gathered upon joining the scheme, upon leaving the scheme, and information is also requested and updated at the annual renewal date, and at regular intervals during the year as is required to ensure its accuracy.

You may visit our website, and choose to either identify yourself (the website may request that you give us information about yourself, from which we are able to identify you, such as your name, email or other contact details).

Alternatively, you may choose not to identify yourself or reveal any personal information. In either case, we can 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.

## Use of the Information we gather

We gather, use and share information only where there is a legal basis for doing so. This includes where you have given us information in order to provide you with a service, product or arrange a transaction or contract for you.

Typically, the legal basis for using your data is to provide a service or arrange a transaction which you have requested. The legal basis will also include complying with our legal and regulatory obligations, e.g. under our Central Bank authorisations, interaction with the Data Protection Commission, Financial Services and Pensions Ombudsman, Revenue, Pensions Authority, Law Enforcement Agencies, and when conducting Anti-Money Laundering checks.

Where you have agreed to the using of your data in a specific way, you may withdraw your consent at any time.

We may use your data if necessary to protect your “vital interests” in exceptional circumstances e.g. where we suspect a fraud may be in the course of perpetration.

Data may also be used for our legitimate interests (which you may object to) such as managing our business, providing service information, conducting marketing activities, training and quality assurance, and strategic planning.

In general, we will use the personal information to provide the services and to fulfil our contractual obligations to our clients. This will include the ongoing collection of relevant data to calculate benefits and contributions and to assess any product needs clients may have.

In addition, we do reserve the right to use the data for the following:

- To review and to provide enhanced services based on the analysis of the data;
- To be able to carry out background checks where relevant;
- To exercise, defend or protect our legal rights, and/or the rights of our clients, and;
- To comply with information requests from government or regulatory bodies.

### **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 (i) we need to share your information to facilitate transactions or services you have requested, and (ii) you have agreed that we may share your information;
- product providers with which we propose to arrange business on your behalf;
- service providers who provide us with support services;
- statutory and regulatory bodies where we are legally obliged to do so;
- credit reference/rating agencies;
- pension fund administrators, where applicable;
- pension scheme trustees or your employer in relation to the provision of pension benefits, where applicable.

### **How long we hold your data**

We will hold personal data, for no longer than is necessary for the purpose for which it was collected, but also in order to comply with the large number of legal and regulatory mandated data retention rules, set by authorities such as the Central Bank of Ireland, The Office of the Data Protection Commission, the Financial Services and Pensions Ombudsman.

The timescales may also depend on the type of financial, insurance, investment or pension product provided to you.

Our Data Retention Schedule is available upon request.

### **Implications of not providing your data**

If you do not provide certain information Acumen & Trust DAC may not be able to:

- provide requested products or services to you;
- continue to provide and/or renew existing products or services;
- assess suitability;
- where relevant, give you a recommendation for a financial product or service which you may require; and
- where you are a member or a prospective member of a corporate pension / risk scheme, we will be unable to include you without all the relevant data.

### **Transfer of information outside the European Economic Area (EEA)**

It is our aim to retain any information which we hold within the EEA. However, given the nature of our business relationships with certain product providers, such providers may have legitimate business reasons to transfer information outside the EEA. The product providers with which we arrange business on your behalf are obliged to comply with the provisions of the GDPR in relation to the transfer of data within or outside the EEA.

### **Data Security**

Acumen & Trust DAC'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.

### **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 (in certain circumstances) please email your request to the contact address below with proof of identity.

### **Contacting Us**

If you have any questions or comments about our privacy notice or data protection practices, please contact us.

Acumen & Trust DAC may modify or update this privacy notice from time to time at any time without prior notice. You can check the "Effective Date" below to see when the notice was last changed. We encourage you to check this notice often so that you can continue be aware of how we are protecting your personal information.

Email: [Solutions@acumen.ie](mailto:Solutions@acumen.ie)

Or via post and address your request to:

**The Compliance Officer  
Acumen & Trust DAC,  
4A Sandyford Business Centre  
Burton Hall Road  
Sandyford  
D18 K856**

Effective Date: 10<sup>th</sup> March 2021

