

Privacy Statement

Introduction:

ifac Investment Services Ltd t/a ifac Financial Planning 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 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 ifac Financial Planning in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Ifac Investment Services Ltd
- Email — info@ifacfs.ie
- Phone - (01) 4277400

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?

ifac Investment Services Limited t/a ifac Financial Planning is a wholly owned subsidiary of Irish Farm Accounts Co-operative Society Limited (ifac).

ifac Financial Planning has been established to provide expert advice to the clients of ifac in the areas of Life, Pensions, Investments, Savings and Mortgages.

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

- Martin Glennon
- info@ifacfs.ie
- Martins number: (01) 4277400

Purpose for processing your data:

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, insurance or mortgage position or products 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.
- 4) Planning your financial future e.g. retirement funding, savings and investment options.
- 5) Residential Property Insurance —enquiry, advice and/or placing insurance cover.

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 requested.

Data will not be held for longer than is necessary 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.

Why we are processing your data?

In order for us to provide you with expert advice in the areas of Life, Pensions, Investments, Savings and Mortgages, ifac Financial Planning need to collect the following personal data:

Personal details - name, address (and proof of address), other contact details (e.g. email and telephone details), gender, marital status, family details, date and place of birth, employer, job title, details of financial products including life policies, pensions, mortgages, savings, investments and household insurance. Details of income and expenditure, assets and liabilities, insurance claims, and mortgage arrears. Identification details - identification numbers issued by government bodies or agencies, utility bills, driver's licence or passport details.

Our reason for processing your data under the GDPR is:

- Legal basis — ifac Financial Planning 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.
- Legal basis - The Consumer Protection Code 2012 (Section 5.1) states that "a regulated entity must gather and record sufficient information from the consumer prior to offering, recommending, arranging or providing a product or service appropriate to that consumer. "

In any event, ifac Financial Planning 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 ifac Financial Planning use the personal data it collects about me?

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

Special Categories of personal data:

If we collect any special categories of personal data (e.g. health), we will obtain your explicit consent.

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 to clients. You can view the list of product providers we hold agencies with via the Central Banks website. 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, United States, Switzerland or in any other country in which ifac Financial Planning does business. We will always try to process data within the EU and UK.

ifac Financial Planning may disclose information it has collected about you if required to do so by law or when necessary to protect the rights of ifac Financial Planning or its employees.

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

Where your introduction to ifac Financial Planning was made by your ifac accountant, we will provide information on the progress of such a referral and a summary of any products established, to your accountant.

Data Subjects Rights:

ifac Financial Planning facilitate our client's 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 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**
- **Right to judicial review:** in the event that ifac Financial Planning 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.

Meeting Recording and Note-Taking

To support the delivery of our services, we create a written summary following each client meeting. This summary outlines the key discussion points, decisions made, and agreed-upon actions. A copy is retained in your client file and made available to you for your own records.

With your explicit consent, we may use a secure audio recording tool during meetings to assist in preparing accurate and comprehensive summaries.

These recordings are used solely for the purpose of creating transcripts and ensuring no important details are missed.

Occasionally, anonymised transcripts may also be used to support internal adviser training and development. When used in this context, all identifying information is removed in advance. No names, personal information, or financial data are ever disclosed during training activities. The use of recording tools is entirely optional and subject to your prior agreement.

Declining this option will not impact the quality or availability of the service you receive.

Retention of your personal data:

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. ifac Financial Planning will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank of Ireland), the Consumer Protection Code 2012 and our internal governance.

Complaints:

In the event that you wish to make a complaint about how your personal data is being processed by ifac Financial Planning or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and/or our data protection officer.

The Data Commissioner can be contacted online via; <https://dataprotection.ie/en/contact/how-contact-us>

Alternatively, you can contact them by phone on: (01) 765 01 00 or 1800 437 737 (please note complaints must be in writing) or via post to:

6 Pembroke Row
Dublin 2
D02 X963
Ireland

Failure to provide further information:

If we are collecting your data for a contract (e.g. Life assurance policy) 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:

Financial and mortgage advisors use profiling in their business. The main categories are:

- a) Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customers attitude to various levels of risk having answered a series of questions.

b) 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 in relation to your needs.

c) Establishing affordability and providing quotations for financial services products.

Contact Us:

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (01) 4277400 or info@ifacfs.ie

Privacy policy statement changes:

Ifac Financial Planning 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 are aware of any changes. By using our services you agree to this privacy policy.

This privacy policy was last reviewed in August 2025