

Privacy Notice/Statement

Introduction

MDG Investment Solutions Ltd, t/a Investment Intelligence 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 under the 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 MDG Investment Solutions Ltd, t/a Investment Intelligence in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- David Gahan
- Contact details: 01-8483351; dataprotection@investmentintelligence.ie
- Throughout this document, “we”, “us”, “our” and “ours” refers to MDG Investment Solutions Ltd, t/a Investment Intelligence.

Please read this Statement carefully as it 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?

We provide advice, execution and ongoing management services in relation to Pensions, Investments and Life Assurance / Protection products (Life Assurance, Income Protection, Serious Illness cover, Partnership, Co-directors and Key Person cover). In relation to Investing we provide a funds-based management service as agreed with each client.

Our GDPR Owner can be contacted directly here:

- David Gahan
- dataprotection@investmentintelligence.ie
- 01-8483351

Our purpose for processing and collecting your data.

We gather data to identify you, including your contact information, your financial details/financial circumstances, your employment, your marital status and special categories of data such as personal health questions;

We collect your data for the following reasons;

- To assess suitability and where relevant to provide you with a recommendation for Pension, Investment, Financial Advice, Service or Product.
- To provide the requested services or products to you.
- To complete application forms and fulfill requirements of any company providing a service(s) or product(s) we are recommending to you.
- To continue to provide and/or renew existing services or products that are suitable to you.

Why we are processing your data?

Our legal basis.

In order for us to provide any Pension, Investment, Financial Advice, Service or Product, we need to collect personal data. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – We need to process your data as this is necessary in relation to any Pension, Investment, Financial Advice, Service or Product, to which any individual has entered into or because the individual has asked for something to be done so they can enter into a contract.
- **Regulation/Compliance basis** – to offer any level of advice or service we must comply with our regulator the Central Bank of Ireland and that requires us to complete a full client Fact Find/Client questionnaire/Risk Questionnaire so that we can satisfy our regulators ‘Know your Client’ requirements.

We 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 we use the personal data we collect about you?

We 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 our company considers it necessary.

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 that we will obtain your explicit consent.

Who are we sharing your data with?

As part of providing our service to you we often are required to pass your personal data on to third-party service providers contracted to us in the course of dealing with you (e.g. obtaining a personalised illustration). 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 Data Protection 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, in the normal course of business as set out above, are (link provided for that companies Privacy Notice where available):

The third parties that we may pass your personal data to, in the normal course of business as set out above, are (link provided for that companies Privacy Notice where available):

- *Aviva Life & Pensions* www.aviva.ie/about-and-support/privacy/UK Ltd
- *BCP* www.bcp.ie/privacy-policy
- *Investec Bank Plc* www.investec.com/en_int/legal/privacy-policy.html
- *Irish Life Assurance plc* www.irishlife.ie/privacy-notice
- *New Ireland Assurance plc* www.newireland.ie/utilities/privacy-statement/
- *Permanent TSB plc* <https://www.permanenttsb.ie/globalassets/pdf-documents/gdpr/bmk4455--data-protection-summary.pdf>
- *Standard Life plc* www.standardlife.ie/privacy
- *The Royal London Mutual Insurance Society Ltd* www.royallondon.com/legal/privacy
- *Wealth Options Ltd* <http://www.wealthoptions.ie/pillar-3-disclosure.asp>
- *Zurich Life Assurance plc* <https://www.zurich.ie/privacy-policy/>

We also require your consent to contact your accountant, tax advisor or other legal representative to obtain information from them which may be required by us in providing, a service or recommending a product to you.

If we transfer personal data to a third party or 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.

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. We will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body, Central Bank of Ireland and our internal governance.

For our Regulation Bodies;

Central Bank of Ireland it is 7 years from the date of the last client/contract transaction.
Financial Service and Pension Ombudsman; it is an open-ended term.

For our Internal Governance; it is an open-ended term.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and our firm's name and the name of our GDPR Owner.

Failure to provide further information

If we are collecting your data for a contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect. We may not be able to assess suitability and where relevant provide you with a recommendation for a financial product or service.

Profiling

Profiling;

Financial advisors using profiling in their business. The main categories are;

a) Investment Risk profiling.

To establish a customer's attitude to investment risk (relates to pensions and investments) third parties have automated calculators which calculates attitude to various levels of risk. This is completed by processing a series of questions answered by you the customer in a questionnaire provided by us, to you.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (01) 8483351 or email, dataprotection@investmentintelligence.ie

Privacy policy statement changes

We 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 policy was last reviewed in May 2022