



## Data Privacy Notice

This is the data privacy notice of Jigsaw Financial Solutions Ltd. It tells you how we obtain and what we use your personal information for and explains your rights around how we use it as well as our privacy practices in connection with our website. Please read this Data Privacy Notice to understand how and why we use your personal information. If you give us personal information about someone else, please make sure you have their permission and make them aware of this Data Privacy Notice, as it also applies to them.

Jigsaw Financial Solutions Ltd respects the rights of data subjects in all interactions including users of our website and is committed to protecting your privacy at all times in accordance with data protection legislation.

Jigsaw Financial Solutions Ltd complies with the requirements of the General Data Protection Regulation and the Irish Data Protection Act. Should you have any queries, please contact Lorraine Cooke.

### How we obtain your personal information

You provide us with your personal information directly when you contact us, complete our forms, speak with us or visit our website, and social media accounts. We also get personal information from solicitors, employers, or regulators (where relevant). We also create new personal information about you based on information you have given us and through your interactions with us as well as noting your online preferences.

Please note that where you provide us with your personal information, either directly to us, through a facility provided on our website, you consent to us:

- Processing and administering your personal data to perform all necessary actions to give effect to your request or instruction; and
- Retaining a record of incoming and outgoing communications (e.g., Phone, email, post, or text message).

Information in the communications we receive and send will not be disclosed to any third party without the permission of the sender unless otherwise stated in this Data Privacy Notice or in accordance with the Irish Data Protection Act and the GDPR. We inform all persons who submit their personal data to us of these conditions by this Data Privacy Notice.

For more detailed information on what personal information is collected and how it is used when using our website please see later in this document.

### Legitimate Interest:

We use your personal information for our legitimate interests as shown below. This doesn't affect your privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions at [info@jigsawfinance.ie](mailto:info@jigsawfinance.ie)

### YOUR CONSENT

You need to give consent for us to collect and use your personal information; your explicit consent for personal information classed as sensitive or for certain/updated uses of your personal information. You are given the choice to provide consent, or not. When we collect your consent, we will explain what we need it for and how you can change your mind in the future.

- Consent for Jigsaw Financial Solutions Ltd to collect and store your personal information to be able to provide you with advice, and in order to make recommendations for you. The information will be held for that purpose, and should you purchase a plan, the information will be used to offer you an ongoing service of that plan. We also may contact you for follow up Financial Reviews even if you do not proceed with the recommendation.
- Consent to Direct Marketing: We would like to be able to contact you about offers and services, separately from your plan communications. We will only send you direct marketing content where we have your consent.

- Jigsaw Financial Solutions Ltd may profile its clients for the purpose of services which we feel might be in the interest of interest to you.
- All clients have the right to opt out of automated processing which includes profiling.

## **Consent and How to Withdraw Consent**

If we process your personal information based on consent, you have the right to withdraw that consent at any time. The opt-out methods will be explained when you give us your consent, e.g. you can change your mind using the opt-out link in any direct marketing email sent to you.

You will also be able to withdraw your consent by contacting us directly.

## **Consent and How to Withdraw Consent**

We need to collect and use your personal information to provide your plan contract. This includes, but is not limited to, your name, date of birth, contact and bank account details. Depending on the plan type this can include health, employment, pension and salary information. We restrict access to, and use of, any sensitive personal information. We also create new personal information. In order to receive financial advice from us, you must give personal and financial information for your current and future needs to be assessed. This enables us to recommend the most suitable financial product for you. This also involves creating new and assumed personal information about you. We complete an analysis of you using your personal information to comply with regulations. When you give us your personal information we will check to see if we already have a record of you. This helps us to comply with your Data Protection Rights.

Personal information needed for plan contracts is held and used to (but not limited to):

- process your application
- set up and issue your plan
- provide you with information about your plan (we use your plan and contact details)
- to help the administration of your plan and assist with payment of your plan benefits
- You must give us your tax residence information and tax identification number for tax reporting with product producers
- provide customer care and service; and
- contact you to inform you of any relevant action you may need to take

## **Required by Law**

We use your personal information to comply with law and regulations such as:

- reporting to regulators
- keeping proper books and records; and
- We carry out internal reporting, quality checking, compliance controls and audits to help meet these obligations.

We must collect certain personal information to comply with anti-money laundering law. To do this, we use personal information including your name, date of birth, address, nationality and occupation information.

- Up-to-date proof of identification and address.
- Screening of all customers against Financial Sanctions and Politically Exposed Persons (PEP and RCA) list.
- Where needed, we carry out searches for publicly available information.

## **Legitimate Interest**

We use your personal information for our legitimate interests as shown below. This doesn't affect your data protection and privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions using the above contact details of this Data Privacy Notice.

- **Statistical Analysis:** We combine and group personal information for analysis to help us understand our customers and develop better services for you.
- We use Google Analytics on our website.
- We use summary information to help promote our services and products from our product providers.
- We use our customer personal information, including yours, to identify the target market for our regulated services.

## **To Whom do we Pass your Personal Information**

We pass personal information to:

➤ **Data processors:**

Data processors (product providers) which we pass your information to for the purpose of setting up a contract for you, who are also data controllers in their own right. We also employ third party services from other companies for CRM management, IT support and clients screening for AML purposes, who only processes your information as instructed and required by this firm.

Data processors (product providers) to whom we pass your information include:

- Irish Life
- Royal London
- Aviva Life & Pensions
- Zurich Life & Pensions
- New Ireland
- Standard Life
- BCP Asset Management Ltd
- Merrion Stockbrokers Ltd
- Permanent TSB Plc
- Haven Mortgages Ltd
- Bank of Ireland
- ICS Dilosk
- Finance Ireland
- Brokers Ireland Network Services Ltd

➤ **Trustees:**

Appointed in connection with the plan contract.

➤ **Investment Service Providers:**

We pass limited personal information to investment service providers where you want to access these services through your plan e.g. Stockbroker or Online Trading Platform.

➤ **Regulators:**

Regulators and the Revenue Commissioners or as needed to comply with regulations and laws.

## **DO WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE OF THE EU?**

Your personal information is processed and stored within the EEA, United Kingdom and Switzerland.

## **How Long Do We Keep Your Personal Information For?**

We keep and use your personal information for as long as you have a relationship with us. We also hold it after this where we need to for complaints handling, for system back-ups needed for disaster recovery and for as long as we have to under regulations. Details of our Data Retention Schedule are available on request.

## **What Are Your Rights?**

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details in this Data Privacy Notice. You will need to give us information to help us identify you and we will respond to you in line with current regulations. Any restrictions to your rights will be explained in our response.

➤ **Right to Information**

You have a right to the information set out in this Data Privacy Notice. We will inform you of our updated Data Privacy Notice, if we change the type of personal information we collect and / or how we use it by providing a copy at our next meeting. We have controls in place to protect your personal information and minimise the risk of security breaches. However, should any breaches result in a high risk for you, we will inform you without delay.

➤ **Right to Restrict or Object**

You can restrict or object to any unfair and unlawful collection or use of your personal information. You can object to any automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person. You can withdraw consent and object to, for example direct marketing.

➤ **Right to Correct and Update**

You can ask us to correct and update personal information we hold about you. Your plans are long-term contracts and to provide you with the best service it is important we have your up to date personal information, such as contact details.

➤ **Right to Delete and Be Forgotten**

You can have your personal information deleted if it is incorrect or has been processed unfairly or unlawfully. This is not an explicit right as your information might be required for the purposes of maintaining the contract.

If you have withdrawn consent, you can ask for your personal information to be deleted. This is not an absolute right as we might need your data for the purposes of the contract agreed with you or to comply with regulations. If we have provided a regulated product or service to you, we must keep your personal information for a minimum period by law.

➤ **Right to Portability**

You can ask for a copy of all personal information that you gave us (including through your interactions with us), and which we hold in an automated format. You can receive this in a machine-readable format that allows you to keep it. You may also request us to send this personal information in a machine-readable format to another company. The format will depend on our ability to provide this in a secure way that protects your personal information. We will not likely be able to use a copy of your personal information sent to us in this way from another company. This is because we can only collect personal information that we need. We also need your most up to date personal information for underwriting and to comply with regulations.

Each request will be assessed on an individual basis to ensure the utmost security.

➤ **Right to Access**

You have the right to know what personal information we hold about you and to receive a copy of your personal information. We must tell you:

- why we hold it.
- who we pass it to, including whether we transfer it outside the EU.
- how long we keep it for.
- where we got it from; and
- if we carried out any automated-decisions, and if so, the logic behind it and what it means for you.

This right does not allow you to access personal information about anyone else. To access your personal information please write to us using the contact details in this Data Privacy Notice. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information.

## **Business**

If Jigsaw Financial Solutions Ltd is involved in a merger, acquisition or asset sale, your Personal Information may be transferred. We will provide notice before your Personal Information is transferred and becomes subject to a different Data Privacy Notice.

## **Future Changes to this Data Privacy Notice**

We may update our Data Privacy Notice from time to time. We will notify you of any changes by posting the new Data Privacy Notice on our webpage [info@jigsawfinance.ie](mailto:info@jigsawfinance.ie) and by providing a copy at our next meeting.

## **Contact Us**

If you have any questions about this Data Privacy Notice, please contact us at Unit 8, 1A Upper Cranford Centre, Montrose, Dublin 4, or on 01-2839360 or via email [info@jigsawfinance.ie](mailto:info@jigsawfinance.ie)

## **When using our website**

The following information relates to our data privacy practices in connection with our website. We are not responsible for the content or data privacy practices of other websites. Any external links to other websites are clearly identifiable as such e.g., Instagram, LinkedIn.

## **Collection and use of Personal Data**

Except in relation to certain specific features of our website, you do not have to provide us with any personal information (or personal data) to use our website. However, where you elect to give us your personal data through our website via “contact us” form then we will treat your personal information in accordance with this Data privacy Notice.

## **Cookies**

We use cookies. We do not collect or store personal information without notifying you via cookies pop up consent form when you visit our website. [Note: You can change the settings on your browser to refuse all cookies. However, you should note that disabling cookies may result in some parts of the site not working efficiently / slower].

We use “cookies” to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our services.

Our cookies are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyse and understand how you use this website. These cookies will be stored in your browser only with your consent. You also have the option to opt-out of these cookies. But opting out of some of these cookies may have an effect on your browsing experience.

**Necessary:** cookies are absolutely essential for the website to function properly. This category only includes cookies that ensures basic functionalities and security features of the website. These cookies do not store any personal information.

**Non-Necessary:** Any cookies that may not be particularly necessary for the website to function and is used specifically to collect user personal data via analytics, ads, other embedded contents are termed as non-necessary cookies. It is mandatory to procure user consent prior to running these cookies on your website.

**Analytical:** cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc.

**Performance:** cookies are used to understand and analyse the key performance indexes of the website which helps in delivering a better user experience for the visitors.

## **Web Browsing**

When you visit our website, information we may know about your visit may be limited to technical data (log data) such as:

- The logical address (or IP address) of the server you used to access our website
- The top-level domain name from which you access the internet (for example .ie, .com, .org, .net)
- The previous website address from which you reached us
- The type of web-browser you used
- Web traffic data (the amount of data sent and received) by visitors to a web site. This is determined by the number of visitors and the number of pages they visit, specific pages of our website that you visit, the time and date of your visit, the time spent on those pages and other statistics

The technical data may be used for administrative and statistical purposes and may be shared with our internet service provider. We may use this information to help us to improve our website.

In addition, we use third-party services such as Google Analytics that collect, monitor and analyse this type of information in order to increase our Service’s functionality. These third-party service providers have their own privacy policies addressing how they use such information.

## **Behavioural Marketing**

Jigsaw Financial Solutions Ltd uses remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service. Google AdWords remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page. Google also recommends installing the Google Analytics Opt-out Browser Add-on for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page.

## **Children’s Privacy**

Our Services does not address anyone under the age of 18 (“Children”). We do not knowingly collect personally identifiable information from children under 18. If you are a parent or guardian and you are aware that your children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children under age 18 without verification of parental consent, we take steps to remove that information from our servers.

These Jigsaw Financial Solutions Limited Data Privacy Notice is valid from 18<sup>th</sup> September 2024 until further notice.

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