

# PRIVACY STATEMENT



## UTMOST IRELAND DESIGNATED ACTIVITY COMPANY

This privacy statement explains how we collect, use and share our customer's personal information. If you have any questions, please contact us using the details provided at the end of this document.

### WHO UTMOST IRELAND DESIGNATED ACTIVITY COMPANY IS

Utmost Ireland designated activity company ("Utmost Ireland") trading as Utmost Wealth Solutions is authorised by the Central Bank of Ireland and regulated by the Financial Conduct Authority in the UK for Conduct of Business Rules. Utmost Ireland is a leading provider of international savings, protection and investment solutions. Utmost Ireland is part of the Life Company Consolidation Group ("LCCG") which is specialist company operating in the European life assurance sector.

### WHAT YOUR INFORMATION IS USED FOR

As our customer you provided us with certain information and entered into a contract with us to issue you with a policy and provide you with ongoing services. Some examples of how we use your information are:

- (1) To administer your contract/policy with us
  - › Reviewing transactions and correspondence to enable us to deal with your queries
  - › Managing and administering your policy in accordance with your terms and conditions
  - › Contacting you to deal with your transaction requests including applications for new policies, additional premiums, full and partial surrenders where applicable
  - › Managing our relationship with you (for example, updating you on changes to our business or updating your record with us if you change your address)
  - › Responding to any complaints you make
- (2) To meet legal and regulatory obligations

As a regulated life assurance company we are required to comply with a range of different legal obligations such as tax reporting, data protection and financial crime prevention. Sometimes we have to share your information with regulatory authorities, for example:

- › Sharing information with Financial Services Ombudsmen in relation to complaints you make
- › Reporting information to tax authorities including, for example, reporting under the Foreign Account Tax Compliance Act ("FATCA") and Common Reporting Standard ("CRS") requirements

- › Meeting obligations we have in relation to the prevention and detection of crime such as money laundering, the reporting of suspicious transactions and requirements to check our records against financial sanctions lists and report matches.
- (3) To improve our business

From time to time we may request feedback from our customers in order to improve the service we offer, for example by conducting customer satisfaction surveys.

### MARKETING AND PROFILING BY US

We will only communicate with you to share important information about your policy or changes to our business. We will not conduct any marketing activity with you without your explicit consent to do so.

### LEGAL BASIS FOR USING YOUR INFORMATION

We will only collect, use and share your information where we have a valid reason to do so under data protection legislation. We have four main reasons for collecting and using your information which are set out below. Often we will need your information for more than one reason, for example, in order to perform a contract and to meet a legal obligation.

**1. Contract** - we have a contract with you to deliver a life assurance product. In order to perform that contract we need to collect certain information from you and process it; for example, your contact details.

**2. Legal obligation** - we may need certain information from you in order to meet our legal obligations; for example, we require proof of identity (for example, certified copy of a passport) to meet our anti-money laundering obligations.

**3. Our business interests** - we continually strive to improve how we do business with you and how to develop our service to you; for example, we may undertake a survey of our policyholders to determine how we can improve our relationship with you.

**4. Consent** - we need your consent to use sensitive information about you; for example, health information which we obtain from you. You have the right to withdraw your consent at any time. Please see the section on 'Your rights' for further information.

## WHO WE SHARE YOUR INFORMATION WITH

### (1) Group companies

We use more than one company in our group to deliver our products and services to you. We may share your data with other LCCG companies as part of our commitment to offer you financial products and services that may be of interest to you. We may also share your data with other LCCG companies in order to meet with our legal obligations.

### (2) Service Providers

We use third party companies to provide services so we can administer your policy and deliver a service to you; for example, customer service providers or IT system companies that hold or analyse your information and carry out searches that help us trace you if we have lost touch.

### (3) Reinsurers

A reinsurer is another insurance company who takes on the risk of when and how much we have to pay customers on their policy. Like other insurance companies we use reinsurers to help us manage our risk.

### (4) Anyone you ask us to share your information with

If you ask us to share your information with a third party we will. For example, with a financial adviser, solicitor etc. If a third party asks for your information, we will check with you to confirm that we have your authority to release it.

### (5) Other parties

As outlined above, under "What your information is used for" we have a legal obligation to provide information from time to time to regulatory bodies such as tax authorities, law enforcement agencies and Ombudsmen.

### (6) Professional advisers

We use professional advisers to provide services to us, for example legal advice, accountancy services and consultancy services.

### (7) Courts and those involved in any legal process

If a court requires us to disclose your information or if it needs to be disclosed as part of a legal process.

### (8) Anyone in the future who may buy or merge with our business

If we merge with another company or are sold to another organisation then we will need to share your information with them.

## WHERE WE USE YOUR INFORMATION

We are based and operate primarily in Ireland. However, information that we collect from you in Ireland may be viewed from, transferred to, or stored, outside the European Economic Area (EEA).

We ensure that we put in place appropriate safeguards when we allow your information to be processed outside the EEA.

## HOW LONG WE KEEP YOUR INFORMATION FOR

We do not keep your information for longer than is necessary. Different information will need to be held for different periods of time; this may be due to a variety of reasons including legal obligations and to enable us to provide you with a good level of customer service.

## WHAT IF YOU DON'T PROVIDE INFORMATION TO US

We try not to ask you for personal information that we don't need. If we ask you for personal information that seems unnecessary to you, please contact our Customer Services team for an explanation.

If you do not provide certain information we may not be able to provide our service to you; for example, if you don't provide the information requested on a surrender form we may not be able to process your surrender.

## YOUR RIGHTS

We have set out a summary of your key rights below, but have not included all the circumstances or conditions which apply to them. If you have any questions on your rights, you can contact our Customer Services team for help.

**Right to stop us using your information**- if you don't want us to use your information for our business interests you can ask us to stop and we will do so unless there is an important reason why we need to continue using it.

**Right to stop us marketing to you**- you can ask us not to send you marketing messages.

**Right to access your information**- you have the right to ask for a copy of the information that we hold about you and this will usually be provided free of charge. For your security, we will take reasonable steps to confirm your identity before providing you with any personal information we may hold about you.

**Right to transfer your information** - you can request that we transfer certain information we hold about you to you or to a third party in electronic form.

**Right to ask us to delete your information** - in certain circumstances you can ask us to stop using or holding your information. If we can delete your information we will, but sometimes we have to maintain records for legal reasons. If we cannot comply with your request, then we will contact you and explain why. If you ask us to stop using your information we will still keep it where we are legally obliged to, but we will not use it for other purposes.

**Right to give or withdraw your Consent** - if you have given consent for us to use your information then you have the right to withdraw your consent at any time. However, if you do withdraw your consent we may not be able to continue to provide the product or service you have contracted us to provide; for example, if you withdraw consent to use health information you provided in a claim form we may not be able to process your claim.

If we have shared the personal information in question with another company (including another company within the LCCG group), we will also let them know that you have asked us to stop using or keeping your information unless it is very difficult or not possible for us to do so.

## HOW TO UPDATE THE INFORMATION WE HOLD ABOUT YOU

It is important that the information we hold about you is accurate and up to date. Please let us know if your information changes, or if the information we hold about you is incorrect. You can ask our Customer Services team to update or correct your information.

If we have disclosed the personal information in question to another company (including another company within the group), we will also let them know about the changes unless it is very difficult or not possible for us to do so.

## CHANGING AND UPDATING THIS PRIVACY STATEMENT

We may change this privacy statement from time to time to keep it up to date, or to comply with legal requirements. In that case a revised version of this privacy statement will be uploaded to our website.

## OUR DATA PROTECTION OFFICE CONTACT DETAILS

If you have any questions or concerns about our use of your information or would like a copy of the information we hold about you, please contact our Customer Services team on the details below, marking your query for the attention of our Data Protection Office:

**Name:** Utmost Ireland dac

**Address:** Iveagh Court  
Harcourt Road  
Dublin 2

**Email:** [info@utmostwealthsolutions.ie](mailto:info@utmostwealthsolutions.ie)

**Phone:** 0845 6029281

## COMPLAINTS

If you are unhappy with any aspect of the service we provide, please let us know using the Customer Services team details above.

You also have the right to complain to the Data Protection Commissioner, contact details as follows:

**Telephone:** +353 57 8684800  
+353 (0)761 104 800

**Lo Call Number:** 1890 252 231

**Fax:** +353 57 868 4757

**E-mail:** [info@dataprotection.ie](mailto:info@dataprotection.ie)

**Postal Address:** Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton  
R32 AP23 Co. Laois

## A WEALTH *of* DIFFERENCE

Utmost Wealth Solutions and Utmost Trustee Solutions are brand names used by a number of Utmost companies. This item has been issued by Utmost Ireland.

The following companies are registered in the Isle of Man. Utmost Limited (No 056473C), Utmost Administration Limited (No 109218C) and Utmost Trustee Solutions Limited (No 106739C) are regulated or licensed by the Isle of Man Financial Services Authority. Not regulated: Utmost Services Limited (No 059248C). Each has its registered office at: Royalty House, Walpole Avenue, Douglas, Isle of Man, IM1 2SL, British Isles.

The following company is registered in Ireland. Utmost Ireland dac (No 303257) is authorised by the Central Bank of Ireland and regulated by the Financial Conduct Authority in the UK for Conduct of Business Rules. Registered office: Block 2, Harcourt Centre, Harcourt Street, Dublin 2, Ireland.

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