



## Growth Investments Ltd

### PRIVACY STATEMENT

**Growth Investments Limited** 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 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 Growth Investments Ltd. in relation to the information we collect about you and other users.

For the purposes of the GDPR the data controller is:

- **Contact:** Richard Cotter
- **Address:** Growth Investments Limited, 29 Kildare Street, Dublin 2.
- **Office Phone Number:** 01 662 8666
- **Email:** Richard.cotter@growthinv.ie

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) is processed.

#### Who are we?

**Growth Investments Ltd** is a Life & Pension, Investment & Savings and Financial Planning Firm that offers a personalised service to individuals that include Company Directors, Senior Executives and Partners of Professional Firms. We also specialise in small Corporate Pension Schemes and have built up a loyal client base over the past 35 years + in business. The company was founded in 1982 by Jim Cotter, and passed onto his son Richard Cotter.

Financial planning is about understanding you, where you want to be and what you're prepared to do to get there. When you come to see Growth Investments it'll be different. We'll spend much less time talking about products and investments and much more talking about you and finding balance.

#### Purpose for processing your data

Before providing a product or service to a client we gather and record sufficient information from them to enable us to provide a recommendation or a product or service appropriate to that consumer.

We gather this information in our meeting with our prospective new client and we record it on our **Client Information Document** (Fact Find) or Insurance Application Form e.g. (Life, Serious Illness, Pension, and Investment).

The level of information we gather will be appropriate to the nature and complexity of the product or service being sought by our prospective client. Without this key information we would not be able to provide our client with a professional service.

#### The core information collected will include (where relevant):

<b>A. Needs and Objectives:</b>	<ul style="list-style-type: none"><li>– The length of time for which the <i>consumer</i> wishes to hold a product</li><li>– Need for access to funds (including emergency funds)</li><li>– Need for accumulation of funds.</li></ul>
<b>B. Personal circumstances:</b>	<ul style="list-style-type: none"><li>– Name</li><li>– Address</li><li>– Contact details: E-mail and Home/Work/Mobile ph</li><li>– Age</li><li>– Health</li><li>– Knowledge and experience of financial products</li><li>– Dependents</li><li>– Employment status</li><li>– Known future changes to his/her circumstances</li></ul>

INVESTMENT & PENSION CONSULTANTS | WEALTH MANAGERS

a: 29 Kildare Street, Dublin 2 | t: +353 1 662 8666 | e: information@growthinv.ie | w: www.growthinv.ie



Registered Number: 91962. Registered Address: 29 Kildare Street, Dublin 2. Directors: Richard Cotter (Managing), Julie Wong-Cotter. Growth Investments Limited is regulated by the Central Bank of Ireland.



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<b>C. Financial situation:</b>	<ul style="list-style-type: none"> <li>– Income</li> <li>– PPS No.</li> <li>– Savings</li> <li>– Financial products and other assets, debts and financial commitments</li> </ul>
<b>D. Attitude to risk:</b>	The importance of capital security to the consumer.
<b>E. Vulnerable clients:</b>	Additional care is afforded to clients who may present as vulnerable. Should any of our advisors or staff in the course of their engagement with the client perceive an element of vulnerability they will revert to the procedure the company has with regards to dealing with vulnerable clients and/or may involve a senior supervisor or a member of the management team

- ✓ Record the Proposal in the Diary System to monitor/follow up with Product Producer
- ✓ Open a separate file divider for each new business transaction the client enters into with the firm
- ✓ All correspondence is filed in date order in the relevant section of the client file
- ✓ Where email correspondence takes place between a Product Producer and or the client we print a copy of the email, place it on the client file, or we save the email to the client file.

### Why do Growth Investments need to collect and store personal data?

As an Investment and Insurance intermediary regulated by the Central Bank of Ireland, we are required to collect certain information and documentation in order to provide the best advice and to complete the required insurance applications which is a contractual necessity, the application must be signed by the Intermediary (Growth Investments Ltd.) and the Client.

For Growth Investments Ltd. to provide the best advice for our client we need to collect personal data in order to:

1. To correctly identify a client's personal financial needs and objectives
2. To correctly quantify the level of any needs or objectives identified
3. To prioritise the clients identified financial needs and objectives, so that the most important needs and objectives are satisfied and dealt with first.
4. To recommend action and financial products, where needed, that can best meet the client's current and anticipated needs and objectives as efficiently as possible, to the maximum extent allowed by the client's financial resources. (Reference: CPC 2012)

A key part of the process of identifying a client's financial needs and objectives is fact finding i.e. establishing facts about the client's financial needs and resources.

### 1. Documentation Completion

Should the client proceed with our recommendation(s) we will progress to completing the relevant documentation in order to transmit the client's instruction to the Product Producer. Copy proposal form(s) and any other relevant documentation, e.g. Cheque/Draft/Direct Debit Mandate etc. and retain on file. At the proposal stage, we explain to our client the consequences to them of failure to make full disclosure of relevant facts, including their medical details, family history etc.

### 2. Anti Money Laundering/Criminal Terrorist Financing

It is standard operating procedure within our firm to request identification documents from all new clients regardless of whether the transaction has triggered the requirement or not. We consider this to be best practice in protecting our firm against potential fraud.

### 3. Documentation Processing

- ✓ Send proposal form or on-line documentation with covering letter/email to the Product Producer.
- ✓ Log Proposal details in the New Business Book (virtual or paper)

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In any event, we are committed to ensuring that any information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

### Under what circumstances will Growth Investment Limited contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

In terms of being contacted for marketing purposes Growth Investments will contact you for additional consent. Should you consent to being contacted for marketing purposes, you have the option to unsubscribe at any time.

### Why we are processing your data? Our legal basis.

For Growth Investments Ltd. to provide you with the relevant products and services we need to collect personal data to meet our regulatory and legal obligations. Our reason (lawful reason) for processing your data under the GDPR is:

- **Consent:** You have agreed or explicitly consented to the using of your data in a specific way. Consent is implicit through the client's signature of at least one of the following documents:
  - Terms of Business Document
  - Financial Factfind
  - Life/Investment/Pension Application

**You may withdraw your consent at any time.**

- **Performance of a Contract:** We need to process your data as this is necessary in relation to a contract of insurance to which the individual has asked for something to be done so they can enter into a contract e.g. (Life, Investment / Pension Application).

- **Legal Obligation:** Use is necessary because we have to comply with a legal obligation e.g. (complying with 'know your client' obligations under the Central Bank's CPC 2012 regulation).

In any event, Growth Investments Limited 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 Growth Investments use the personal data it collects about me?

**Growth Investments Limited** 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 endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary.

**Growth Investments Limited** as an insurance and investment intermediary is required to retain information for a period of at least 6 years, available for inspection by Central Bank, all records of products sold to and advice given to clients.

In addition each intermediary is required to retain the following files:

- Individual client files, including fact find, terms of business letter and details of advice given to the client and transactions carried out for the client, including reason why letters.
- Written procedures
- Financial Institutions file, including a copy of each written agency appointment, copies of all correspondence with the institutions, etc.
- Central Bank File, including all correspondence with the Central Bank

Personal data may be held in addition to these periods depending on individual business needs.

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### 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 the below:

- we will obtain your explicit consent
- ensure the personal data is necessary for employment rights or obligations;

### Who are we sharing your data with?

We may pass your personal data on to third-party service providers from whom a written letter of appointment is held with Growth Investments in the course of dealing with you.

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfill the service they provide on your behalf. When they no longer need your data to fulfill this service, they will dispose of the details in line with their 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 pass your personal data to are:

Insurance Companies	Accountants	Solicitors	Tax Advisors
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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.

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.

### Data Subjects Rights:

Growth Investments Limited facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request or via our website.

**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 Growth Investments Limited 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.

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### Additional information we are providing you with to ensure we are transparent and fair with our processing

- **Retention of your personal data:** Growth Investments Limited as an insurance and investment intermediary is required to retain information for a period of at least 6 years, available for inspection by Central Bank, all records of products sold to and advice given to clients.

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Growth Investments Limited will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank) and our internal governance.

- **Withdraw consent:** If we are relying on your consent to process your data you can withdraw this at any time – this does not affect the lawfulness of processing based on your consent before its withdrawal.
- **Complaints:** In the event that you wish to make a complaint about how your personal data is being processed by Growth Investments Ltd. or on how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Growth Investment's data protection representative, Richard Cotter.

If you wish to make a complaint you may do so in person, by telephone, in writing and by email. Please be assured that all complaints received will be fully investigated. You can also contact the Data Protection Commission at [www.dataprotection.ie](http://www.dataprotection.ie)

- **Failure to provide further information:** If we are collecting your data for a statutory requirement (payroll) or to fulfill a contract (life, pension, investment 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:** Automated decision-making and Profiling are techniques often used in the financial services sector to both streamline processes and to measure risks or identify opportunities.

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 customer's 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 to your needs.
- c) **Establishing affordability and providing quotations for financial services and mortgage product**

- **Additional Processing:** If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data

### Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (01) 662 8666 or email [richard.cotter@growthinv.ie](mailto:richard.cotter@growthinv.ie)

### Privacy Policy Statement Changes

Growth Investments Limited 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 February 2019.

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