

# Data Privacy Notice

## NIXON ALEXANDER FINANCIAL SERVICES LTD

### Last Updated 24<sup>TH</sup> March 2026

#### Introduction & how to contact us

This is the Data Privacy Notice of Nixon Alexander Financial Services Ltd (also referred to as the firm, we, our, us) and provides information about the ways in which the firm collects and uses personal data. Please read this Data Privacy Notice to understand how we obtain and use your personal information. We may update our Data Privacy Notice from time to time. We will notify you of any changes by providing a copy of our Data Privacy Notice at our next meeting. If you have any questions about this Data Privacy Notice, or you have any queries about your data, please email [siobhan@alexanderfs.ie](mailto:siobhan@alexanderfs.ie) or you can write to us at our address.

#### Law and Regulation

For the purposes of data protection legislation, the *Data Controller* of your personal data is Nixon Alexander Financial Services Ltd. The firm complies with the Irish Data Protection Acts, the General Data Protection Regulation (GDPR) and the ePrivacy regulation. Nixon Alexander Financial Services Ltd respects the rights of data subjects in all interactions and is committed to always protecting your privacy in accordance with data protection legislation.

#### How we obtain and use your personal information

You provide us with your personal information directly when you contact us, complete our forms, email and write to us, and **visit our website** or when you speak with us. We may get personal information from external sources which can include, public registers, solicitors, employers, trustees, medical professionals, legal or regulatory bodies (where relevant as appropriate).

We collect and use personal information to arrange transactions on your behalf as agreed with you, to service our customers, assist with claims and the payment of plan benefits. We must have a lawful basis to collect and use personal information (this are explained later in this document).

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, and where we use cookies, we will inform you via our cookie consent banner. However, where you elect to give us your personal data through our website via online contact / feedback forms or web email then we will treat your personal information in accordance with this Data privacy Notice. Further information on cookies data collection is set out below.

We may also create new personal information about you based on information you have given us and through your interactions with us, e.g. creating a client risk profile to determine risk appetite, interpreting client data for suitable products and recommended actions **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.**

Information in the communications we receive from, and send to, you 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 Acts and the GDPR.

#### Security and Storage of data

**Nixon Alexander Financial Services Ltd** takes seriously its security obligations in respect of your personal data under the Data Protection Act and the GDPR with regards to protection and keeping it secure, to prevent unauthorised access to, alteration, loss or destruction of all personal data in our possession. All information you provide to us is stored securely.

#### Do we transfer your personal information outside of the EU?

Your personal information is processed and stored within the EU

#### How long do we keep your personal information for?

We will keep and use your personal information for as long as you have a relationship with us. We also hold it after this, e.g., where we need to for complaints handling, for system back-ups needed for disaster recovery and for as long as we must for compliance with regulations and law e.g., six years under the Consumer Protection Code (CPC).

#### To whom do we pass your personal information?

We reserve the right to access and disclose personal data in compliance with Data Protection Legislation and when engaging with our service providers.

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**Our Service Providers**

We use service providers to help us provide financial services to our clients. We employ third party companies and individuals to facilitate our services. These third parties have access to your personal information only to perform these tasks on our behalf and are strictly obligated not to disclose or use it for any other purpose in accordance with the General Data Protection Regulation and the Irish Data Protection Act 2018. Where we employ third parties who access your data in this way (on our behalf), they are subject to a comprehensive due diligence and strict contractual restrictions to ensure that your data is always protected and secure and in compliance with Data Protection legislation.

A full list of the service providers and data processors to whom we pass your personal information is available on request. The reasons your personal information may be shared include the following:

**- Data Processors:**

Data processors include product providers to which we pass your information to for the purposes of setting up a contract for you, or to arrange, on your behalf, transactions you have requested or agreed upon. Depending on the product, the processing may be subject to automated decision-making, but we will explain the logic involved and what it means for you. You have the right to object to automated decisions and have a person review your data.

We also employ companies that act as service providers under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used by any other parties or for any other reason. The categories of services that we use other Data Processors for, CRM systems for document management and administration, underwriting, customer services, and cloud storage systems, IT services and support, client screening for AML purposes including Financial Sanctions and PEP screening, accountancy audits, actuarial purposes, service emails. Other Data Processors to help us comply with our statutory, regulatory and compliance obligations.

We employ third party companies and individuals to facilitate our website and to perform service-related services or to assist us in analysing how our services are used/viewed, e.g. an internet service provider or website developer. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose in accordance with the GDPR and Irish Data Protection Act.

**- Trustees & Employers:**

Appointed / in connection with the plan contract.

**- Legal or regulatory bodies and compliance systems:**

Includes the Central Bank of Ireland, the Financial Services and Pensions Ombudsman, the Pensions Authority, the Revenue Commissioner, the Data Protection Commissioner, An Garda Síochána, GoAML, and other compliance checks as needed to comply with our obligations under regulation and law.

**Lawful basis we rely on to collect and use personal information includes:**

Where we collect your personal information, we will make this Data Privacy Notice available to you. Please note that where you provide us with your personal information, we advise you are consenting to us:

- Storing, processing and administering your personal data, to perform all necessary actions, to give effect to your requests or instructions; and
- Retaining a record of the above including records of incoming and outgoing communications (e.g., Phone, email, post, or text messages) in accordance with our Data Retention Schedule.
- This does not affect your data protection rights.

**- Consent and how to withdraw consent**

Where processing is permitted because the data subject has given consent to the processing for one or more specific purposes. Such consent must be “opt-in”, freely given and clearly understood. If we process your personal information based on consent, you have the right to withdraw that consent at any time and this will be explained when you give us your consent, i.e., you can change your mind and withdraw consent by contacting us directly.

Please note, if you withdraw your consent, which was necessary and required to provide financial services to you, we will not be able to continue providing those services and if storage/processing needs to continue, we will explain why.

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**- Your Consent**

You need to give consent for us to collect and use personal information and your explicit consent in the case of your special category personal information (classified as sensitive data). 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 the firm to collect and store your personal information to be able to provide you with financial services, advice and to allow us to make suitable recommendations for you. 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.

Your 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 a 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, e.g. marketing or promotional emails / newsletters / texts.

**- Consent to Profiling**

Profiling for targeted advertising or promotional purposes.

**- Needed for a plan contract**

We need to collect and use your personal information to provide your plan contract. This processing is necessary for the performance of a contract or to take steps at your request before entering a contract. This includes, but is not limited to, your name, date of birth, contact information, financial and bank account details. Depending on the plan type this can also include health, employment, PPSN, pension and salary information, your tax residence information and tax identification number for tax reporting with product producers.

We restrict access to, and use of, any sensitive personal information. We may also create new personal information. 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 claims and the payment of your plan benefits
- provide customer care and service; and
- contact you to inform you of any relevant actions you may need to take.

**- Required by law**

We use your personal information to comply with law and regulations, which includes but is not limited to:

- reporting to regulators
- keeping/maintaining proper books and records,
- carry out internal reporting,
- quality checking, compliance controls and audits to help meet our obligations.
- to comply with anti-money laundering law and fulfil our obligations
- Where needed, carrying out searches of publicly available information

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#### **- Our Legitimate Interest**

We use and process 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.

- Sending annual reviews to clients
- Maintaining business records
- Security and training purposes
- Preventing fraud
- 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.

#### **Marketing**

From time to time Nixon Alexander Financial Services Ltd may send marketing emails and newsletters to consenting persons. 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.

#### **Using our website**

The following information relates to our data privacy practices in connection with our website. When you visit our website, we do collect personal data on you: user's name, email address, phone number, and message submitted via the contact form.

This technical data may be used for administrative and statistical purposes and may be shared with our internet service provider / website developer. We may use this information to help us to improve our website. This technical data does not provide us with the identity of the owner of the personal data when visiting our website.

All that 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

#### **- Cookies**

We use "cookies" to collect information when you use our website. We do not collect or store personal information without notifying you via a cookies pop-up consent banner, when you visit our website. You can change the settings on your browser to refuse all cookies or to indicate when a cookie is being sent. However, you should note that disabling cookies may result in some parts of the site not working properly and you may not be able to use some portions of our services. Please see a list of the cookie data outlined at the bottom of this document.

#### **What are your Data Protection 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 some personal 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 be informed**

You have a right to the information set out in this Data Privacy Notice. The law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data. We inform all persons, who provide their personal data to us, of these conditions by way of this Data Privacy Notice and request that you read the information provided in this document. 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. We may update our Data Privacy Notice, for example, if we change the type of personal information we collect and / or how we use it,

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process or store it. We have controls in place to protect your personal information and mitigate the risk of security breaches. However, should any breaches result in a high risk for you, we will inform you without delay. We are happy to clarify any points or answer any questions you may have.

**- 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 and ask for the decision to be made by a person.

**- 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, including your contact details. We are not required to rectify or erase your data where to do so would prevent you from meeting your contractual obligations to us or where we are required to process (including retaining) your personal data for a lawful purpose in accordance with the General Data Protection Regulation and the Irish Data Protection Acts.

**- Right to Delete and Be Forgotten**

You can have your personal information deleted if it is incorrect or has been processed unfairly or unlawfully. If you have withdrawn consent, you can ask for your personal information to be deleted. We will keep a record of your request, so we know why your personal information was deleted. If we have provided a regulated product or service to you, we must keep your personal information for a minimum period by law. This right does not affect the requirement to hold your information for the purposes of fulfilling a contract.

**- 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 but 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 and because we need your most up to date personal information for underwriting and to comply with regulations.

**- 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. 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 to enquire whether our firm holds personal information about you, or if you are only seeking copies of specific personal information or a full data access request for a complete copy of your client file, e.g. all the information we hold about you. We will comply with a full data access request within one month of receiving your request. 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.

**Data Protection Commission & your right to complain**

It is preferred that all complaints should be address with the firm in the first instance, however, should you wish to report a complaint to the appropriate regulator or if you feel that we have not addressed your concern in a satisfactory manner, you may choose to refer your complaint to the Data Protection Commission.

**Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.**  
**<https://www.dataprotection.ie/en/contact/how-contact-us>**

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**Business**

If the firm is involved in a merger, acquisition or asset sale, your personal information may be transferred to another Data Controller. We will provide notice to you in writing before your personal information is transferred and becomes subject to a different Data Privacy Notice.

**Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children") and we do not knowingly collect personal information from children. If you are a parent or guardian and you are aware that children have provided us with personal information, please contact us urgently and we will take immediate steps to remove that information.

**Strictly Necessary**

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
wpEmojiSettings	Wordpress	to determine if the user's browser can properly display emojis, ensuring correct website functionality	Session	Necessary

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
moove_gdpr_popup	Wordpress	Stores the user's cookie consent preferences to prevent the banner from appearing repeatedly and to remember selected privacy settings.	1 year	Necessary

This website currently does not use statistical or marketing cookies.

**This Data Privacy Notice is valid from 24<sup>th</sup> March 2026 until further notice.**

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