

Privacy Notice

Sunrise Financial Planning Ltd 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. For the purposes of the GDPR the data controller is Sunrise Financial Planning Ltd. Our contact details are Unit 9 Steamboat Quay, Dock Road, Limerick. When we refer to we/us, we mean Sunrise Financial Planning Ltd. Please read this Privacy Notice carefully as this 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?

At Sunrise Financial Planning, our passion is helping you secure your financial future. We specialise in providing expert, personalised advice across Life, Pensions and Investments, working with a carefully selected panel of trusted product providers to find the solution that truly fits your needs. To do this well, we'll need to get to know you — and that means collecting some personal information along the way. This Privacy Notice explains exactly how we handle that information, what we use it for, and the rights you have over it. If you ever have any questions or concerns, please don't hesitate to get in touch with us directly. This Privacy Notice applies to you, whether you are a current, past, or prospective customer. It also applies to third parties whose data you provide to us in connection with our relationship with you (for example, the names of relatives). Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to us.

Data Security

We are committed to keeping your personal data safe. We have appropriate technical and organisational measures in place to protect your information against unauthorised access, loss, misuse, or disclosure. All personal data held on our systems is stored securely, and access is restricted to authorised personnel only. In the unlikely event of a data breach that may affect your rights, we will notify you and the Data Protection Commission as required by law.

Data we may collect about You

In order for us to give you a recommendation and information on financial products, we need to collect and process personal information about you. If you do not provide the information we need, we may not be able to offer you advice or provide our services to you. The types of personal data that are processed may include:

- **Individual details** - Name, address, other contact details (e.g., email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you.
- **Financial details** – details on any debts, loans, or assets you may own. Salary and bank details such as IBANs and branch location.
- **Identification details** - Your PPS number, passport number, tax identification number.

- **Health information** which has additional protection under Data Protection Law. We do not process health information other than hold the information on application forms you have filled in. The Life Insurers process and control your health data to allow them to underwrite your policy or decide to decline cover. They may have further information they have obtained with your approval from your doctor, but we are not privy to this information.
- **Claims information** – information you give us with regards claims you notify us about or ask for help on.
- **Policy Information** - Information about the quotes you receive and policies you take out.

Where We May Collect Your Personal Data From

We may collect your personal data from various sources, including....

- You, directly, when you engage with us in person, by phone, or in writing.
- Your employer or representative.
- Life Companies we have agencies with.
- When you request a quote from us.
- Other insurance or financial contracts you hold, where you have provided us with written authorisation to act on your behalf.
- When you visit our website and input a request for us to contact you, through cookies and tracking technologies.
- When you interact with us on social media platforms such as Facebook, Instagram and LinkedIn.
- Publicly available sources, such as the Companies Registration Office (CRO), where you are a company director or business owner. Not all of the above will apply to everyone — the information we collect and where we collect it from will always depend on your personal circumstances and the nature of the advice or service you are seeking.

Legal Basis for Processing Your Information

We will only use your Personal Data for lawful reasons such as:

- The use is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract (such as providing a recommendation)
- The use is necessary to comply with our legal obligations.
- You have consented to us using your information in such a way.
- The use is necessary for the purpose of our legitimate interests.
- The use is necessary for the performance of a task carried out in the public interest, such as assisting a regulatory authority's investigation of a criminal offence.

The Purpose of Processing Your Information

We use your personal data for the following purposes:

- To provide you with personalised financial advice and to arrange suitable Life, Pensions and Investment products on your behalf.
- To fulfil our contractual obligations and to administer any policies or products you hold through us.
- To share information where necessary with policyholders, beneficiaries, trustees, and other relevant parties connected to your arrangements.
- To comply with our legal and regulatory obligations, including Anti-Money Laundering, Sanctions compliance, PEP

checks, and our obligations to the Central Bank of Ireland.

- To handle any queries, complaints or claims you bring to us.
- To understand how visitors interact with our website and to improve our online services.
- To communicate with you about our services and, where permitted, to send you relevant updates or marketing information.
- To notify you of any changes to our services or this Privacy Notice.

Who We Share Your Information With?

To provide our services and to comply with legal obligations imposed on us, we may share your information with:

- Pension Trustees, & beneficiaries of Pensions & other Financial Products, Relatives & guardians, (in certain circumstances and within the law)
- Employers - past, present, and prospective.
- Legal, financial, investment, medical & other professional advisors in the process of submitting your application.
- Companies we may outsource some of our services to.
 - Businesses that refer your business to us.
- Any business which we are required by law to share the information with, i.e. compliance resource companies.
- Database provider all data encrypted.
- The Pensions Authority.
- Insurance and Assurance companies we have agencies with.
- Investment Companies we have agencies with.
- An Garda Síochána. (Anti Money Laundering).
- Central Bank of Ireland. We are authorised by the Central Bank, and they have the right to inspect our files.
- The Financial Services Ombudsman. In the event of a complaint.
- Data Protection Commissioner.

Special Categories of Personal Data

Some of the personal data we collect is classified as "special category" data under GDPR, which means it requires additional protection. This includes health and medical information, which we may collect in connection with life assurance, health insurance, or pension applications. Where we process special category data, we do so in accordance with the **Data Protection Act 2018**, which permits us to process such data for insurance and pension purposes. We will ensure that appropriate safeguards are in place to protect your rights at all times. We will only collect special category data where it is strictly necessary for the product or service you have requested.

Third Party Data Processing Agreements

Where we share your personal data with third-party service providers who process data on our behalf — such as IT providers, software platforms, or compliance services — we ensure that appropriate **Data Processing Agreements** are in place with each of these providers. These agreements require them to handle your data securely, in accordance with GDPR, and only for the specific purposes we have authorised. We do not permit any third-party processor to use your data for their own purposes. We use FE Cashcalc and Tishkent, a secure financial planning portal and CRM system, to collect and store certain client information for the purposes of financial

planning and cash flow analysis. These platforms are provided by a trusted third-party provider and all data processed through them are protected in accordance with GDPR. A Data Processing Agreement is in place with these provider to ensure your data is handled securely and only for the purposes outlined in this Notice.

International Data Transfers

We do not routinely transfer your personal data outside of Ireland or the European Economic Area (EEA). However, some of the third-party software and systems we use to operate our business — such as cloud-based storage or email platforms — may process data in countries outside the EEA. Where this occurs, we ensure that appropriate safeguards are in place, such as Standard Contractual Clauses approved by the European Commission, to ensure your data remains protected to the same standard as within the EEA. Please contact us.

How Long Do We Keep Your Information?

When providing products to you it may be necessary to retain your information for an extended period. We keep your information for as long as required by law for the purpose that you gave it to us for. As a rule, for legal and best practice reasons we are required to keep your information for 6 years after the date on which our relationship with you ends.

Your Right to Access Your Personal Data

You have the right to request a copy of the personal data we hold about you at any time, free of charge. Where data is processed by automated means or on the basis of your consent, you may also request it in a commonly used electronic format or ask us to transfer it to another data controller. To make a request, simply contact us in writing by letter, email, or text message. We will respond within one month, though in complex cases we may extend this by a further two months and will write to explain any delay.

Correcting Your Personal Data

You have the right to have your Personal Data corrected if you feel we have incorrect data held on you.

Deleting & Restricting Your Personal Data

You have the right to request the deletion of your personal data, subject to any legal or regulatory obligations that require us to retain it. Please note that deleting your data may affect our ability to administer your financial products or provide our services to you. To make a request, please contact us directly. You have the right to restrict our use of your Personal Data in certain circumstances. Please contact us if you wish to do so.

Automated/Profiling Decision Making

Where we use automated decision-making, you will always be informed & you will be entitled to have a person review the decision so that you can contest it and put your point of view and circumstances forward. E.g., When we produce quotes for the business you are contacting us about or when we are reviewing your risk profile. When we want to market to you, we may run a program which allows us to identify certain criteria of clients (all those with that fit within a certain criterion for example)

Your Right to Object and Withdraw your Consent to Data Processing

Where our lawful basis for processing your Personal Data is based on our legitimate interests, you have the right to object. You also have the right to withdraw your consent to any processing at any time. However, if we cannot process your data, it may make it difficult, impossible, or unlawful for us to give you information on, provide you with, advice on financial products. If you want to object or withdraw your consent to processing, please contact us.

Your Right to Object to Direct Marketing

You have the right to object to your personal data being used for direct marketing purposes at any time. If you no longer wish to receive marketing communications from us, please contact us and we will action your request promptly.

Complaints

If you wish to make a complaint about how your personal data is being processed by Sunrise Financial Planning Ltd, or how your complaint has been handled, you have the right to lodge a complaint with our GDPR Officer – Deirdre O’Doherty. You may also lodge a complaint with the Data Protection Commission (DPC) in Ireland, whose details are: Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2 or by email to info@dataprotection.ie.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 061 – 412388, or by email on info@sunrisefinancialplanning.ie

Privacy Notice/Statement changes

When we update this Privacy Notice/Statement, we will post a revised version online. Changes will be effective from the point at which they are posted. We would encourage you to review our Privacy Notice so that you are aware of updates.

This privacy policy was last reviewed in March 2026.

