



Terms of Business & Data Privacy

Dear Client,

I attach for your information a document setting out the terms under which our firm will provide insurance and investment business services to you and also our Data Privacy Notice.

You should read through this document and if there are any matters on which you require clarification, we will be happy to explain the matter in more detail.

These terms will remain in force and shall apply to any business service provided to you now or at a future date. Should our firm change any of its business terms at a future date we will advise you in writing in advance of the changes.

Data Protection

Callery Wealth Management Ltd. complies with the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018. The data which you provide to us will be held on a computer database and paper files for the purpose of arranging transactions on your behalf.

Your data will be passed to the relevant product producers with whom **Callery Wealth Management Ltd.** has agencies for the purpose of arranging transactions agreed with you.

Agency Listing

The following are a list of Insurance undertakings and product producers from which letters of appointment are held by **Callery Wealth Management Ltd.**

Aviva Life & Pensions
BCP
Irish Life
Newcourt Retirement Fund Managers
New Ireland
Standard Life International
Zurich

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Niall Callery', with a stylized flourish at the end.

Niall Callery Director
087-9805848

Terms of Business of Callery Wealth Management Ltd

These terms of business will remain in force and shall apply to any business service provided to you now or at a future date. Should my firm change any of its business terms at a future date I will advise you at our next meeting.

- The full name and address of the firm is set out on the top of this document.
- **Callery Wealth Management Ltd** is authorised and regulated by the Central Bank of Ireland. Central Bank reference number is **C494297**
- **Callery Wealth Management Ltd.** is registered to undertake insurance mediation under the European Union (Insurance Distribution) Regulations 2018; as an Investment Intermediary, authorised under Section 10 of the Investment Intermediaries Act, 1995, and as an Investment Product Intermediary, under Section 31 of the Investment Intermediaries Act, 1995 (as amended). Copies of our regulatory authorisations are available on request. The Central Bank of Ireland holds registers of regulated firms. You may contact the Central Bank of Ireland on 1890 777 777 or alternatively visit their website at www.centralbank.ie to verify our credentials.
- **Callery Wealth Management Ltd.** is subject to the Minimum Competency Code 2011, the Consumer Protection Code 2012 and Fitness and Probity standards which can be viewed on www.centralbank.ie
- **Callery Wealth Management Ltd.** offers a range of products and services including life assurance, pensions and investments.
- **Callery Wealth Management Ltd.** holds written appointments with a number of insurance undertakings, lenders and product producers; however, **Callery Wealth Management Ltd.** has selected one preferred product producer, Irish Life Assurance Plc for life insurance plans (including life assurance, specified illness cover, income protection, unit linked savings, investments, and pension plans), tracker bonds, and Personal Retirement Savings Accounts (PRSAs). Analysis of the market will be limited to products provided by Irish Life Assurance Plc. A list of the product producers with which **Callery Wealth Management Ltd.** holds an agency appointment outlined on the cover page of this document.
- **Callery Wealth Management Ltd.** may receive commission and other payments from the life assurance provider to whom orders are transmitted. Summary details of these payments will be included in a product information document, under the Customer Information Notice section, which you are legally entitled to receive before an application for a product is completed. These payments are included in the charges of your product. Any ongoing commission shown in the Customer Information Notice will be paid to me as long as I continue to be your Financial Adviser. The full details of the commission **Callery Wealth Management Ltd.** receives for Life Assurance products (excluding Company Pension products) will be included in your Welcome Pack which is issued to you. Details of company pension and bank products' commission are available upon request. In certain circumstances the firm may charge you a fee for the services provided. If we do this, we will provide you with a written estimate of this in advance of providing any business service.
- **Callery Wealth Management Ltd.** complies with the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018. The data which you provide to us will be held on a computer database and paper files for the purpose of arranging transactions on your behalf. Your data will be passed to the relevant product producers with whom **Callery Wealth Management Ltd.** has agencies for the purpose of arranging transactions agreed with you. Your data will be processed

only in ways compatible with the purposes for which it was given and as outlined in our Data Privacy Notice and Data Protection Policy and Procedures.

This information will only be used to provide you with business services, to meet any legal and regulatory obligations, and for legitimate business reasons. From time to time, we will send information about other financial products and services, provided by us or associated companies with which we have a formal business arrangement, which we think may be of interest to you. You have the right to ask us not to send you this marketing material and, at any time you can 'opt out' of receiving marketing material.

- You have a right to see the information that is held on you and you can do this by writing to me at the address given. We would like to contact you by way of letter, email or telephone call. If you would like to receive such marketing information please complete the permission statements contained in the Terms of Business Client Acknowledgement Letter attached. You have the right at any time to request a copy of any 'personal data' within the meaning of the GDPR) that our office holds about you and to have any inaccuracies in that information corrected. Please contact us at **Callery Wealth Management Ltd.** if you have any queries about your personal data.
- It is the policy of **Callery Wealth Management Ltd.** to avoid any conflict of interest when providing business services to its clients. However, where an unavoidable conflict may arise we will advise you of this in writing before proceeding to provide any business service. If you have not been advised on any such conflict you are entitled to assume that none arises.
- **Callery Wealth Management Ltd.** will, if necessary, exercise its legal rights to receive any payments due to it, from clients for business services provided by it and to be reimbursed for any value obtained by it for clients arising from payments to it by clients which subsequently default. Irish Life Assurance Plc may withdraw benefits on default of payments due under any products arranged for your benefit. Details of these provisions will be included in your product terms and conditions.
- Any complaint that you may have in relation to the business services provided should be made in writing to **Callery Wealth Management Ltd.** outlining the nature of your complaint. All complaints will be acknowledged in writing within 5 business days of the complaint being received. The complaint will be fully investigated by **Callery Wealth Management Ltd.** and a full response will be provided to you as soon as possible. We will aim to provide this response not later than 40 business days from receipt of your complaint and will provide you with a regular update on the progress of the investigation of the complaint at intervals of not greater than 20 business days, starting from the date on which the complaint was made. In the event that you remain dissatisfied with the firm's handling of and response to your complaint you are entitled to refer your complaint to the Financial Services and Pensions Ombudsman (contact details below).

Financial Services and Pensions Ombudsman
Lincoln House
Lincoln Place
Dublin 2
Phone: 01 567 7000
E-mail: info@fspo.ie
Website: www.fspo.ie

- Sustainability Factors – Investment/IBIPs/Pension Advice. When providing advice, **Callery Wealth Management Ltd** does not consider the adverse impacts of investment decisions on sustainability. The firm does not intend to consider such impacts in the future

- **Callery Wealth Management Ltd.** is a member of the investor compensation scheme run by the Investor Compensation Company Limited. The scheme provides a way of paying certain investors compensation, subject to the relevant limits, if they suffer financial loss caused by an investment firm being unable to meet its financial obligations (in other words, pay everything it owes). In the event that a right to compensation is established, the amount payable is the lesser of ninety per cent of your loss, which is recognised as being eligible for compensation, or €20,000.

These Terms of Business are effective from **28th January, 2025**

Data Privacy Notice

Privacy Notice for Callery Wealth Management Ltd

This is the privacy notice of **Callery Wealth Management Ltd.** and tells you what we use your personal information for and explains your rights around how we use it.

Please read this 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 Privacy Notice, as it also applies to them.

Callery Wealth Management Ltd. complies with the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018. Should you have any queries, please contact Niall Callery, Director

Collection and use of Personal Data

We 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.

Needed for your Contract:

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.

Personal information needed for plan contracts is held and used to;

- process your application;
- set up and issue your plan;
- provide you with information about your plan;
- to help the administration of your plan and assist with 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 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. This depends on your plan type. To do this, we use 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) lists.
- Where needed we carry out searches of publicly available information

You must give us your tax residence information and tax identification number for tax reporting with product producers. In order to give you information and updates on your plan, we use your plan and contact details. We use our customer personal information, including yours, to identify the target market for our regulated services.

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.

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 using the above contact details of this 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 summary information to help promote our services and products from our product providers.

Your Consent

You need to give consent for us to collect and use personal information classed as sensitive or for certain 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.

- Profiling:
- Direct Marketing:

We would like to be able to contact you about offers and services from across our group of companies, separately from your plan communications. We will only send you direct marketing content where we have your consent. When you use our website, you can consent to third party advertising. This shows you our ads where you have visited our website before or visited other websites offering similar products and services.
- Sharing with Other Companies with whom we have business arrangements

We believe it may help you if we know whether you have products and services provided by other companies or if other services may be of interest to you. We will use this to provide you with additional services with your consent.

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 depend on how the consent was collected and 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 emails sent to you.

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

How and where do we get 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. For more information on what personal information is collected and used on our website please see our Website Privacy Policy. 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 such as noting your online preferences.

To Whom do we Pass your Personal Information

We pass personal information to:

Data processors:

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 other parties for any other reason. Our main Data Processors are reputable third parties whose services we engage for document & file management and computer systems & maintenance and all in accordance with financial regulator guidelines. These third-party service providers may change over time.

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.

Other Companies:

We pass your personal information to third parties, including other companies within the Group, if any, with your consent.

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 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. We will let you know how long we keep personal information for when you avail of a single or specific service such as a quote or call-back.

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 Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month 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 Privacy Notice. We will inform you of our updated Privacy Notice, if we change the type of personal information we collect and / or how we use it. 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. 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.

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.

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 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

