



TERMS OF BUSINESS

Effective from September 2022

Karen Doyle trading as One Plan Financial

These Terms of Business set out the general terms under which our firm will provide business services to you and the respective duties and responsibilities of both the firm and you in relation to such services. Please ensure that you read these terms thoroughly and if you have any queries we will be happy to clarify them. If any material changes are made to these terms we will notify you.

Authorisation with the Central Bank of Ireland

Karen Doyle trading as One Plan Financial (C490195) is regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations 2018. Copies of our regulatory authorisation is 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.

Codes of Conduct

One Plan Financial is subject to the Consumer Protection Code, Minimum Competency Code and Fitness & Probity Standards which offer protection to consumers. These Codes can be found on the Central Bank's website www.centralbank.ie

Our Services

Financial Services: Insurance Based Investment Services, Life Assurance, Pensions & Retirement Planning Services.

Financial Products: Insurance Based Investment Products, Life Assurance Products, Deposits Products, Pensions and Retirement Planning Products.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life, pensions, investments and general insurance products. A full list of insurers, product producers and lending agencies with which we deal is available on request.

We act as an **Independent Broker** which means that the principal regulated activities of the firm are provided on the basis of a **fair and personal analysis** of the market

Fair and Personal Analysis

The concept of fair and personal analysis describes the extent of the choice of products and providers offered by an intermediary within a particular category of life assurance, general insurance, and/ or a specialist area. The number of contracts and providers considered must be sufficiently large to enable an intermediary to recommend a product that would be adequate to meet a client's needs.

The number of providers that constitutes 'sufficiently large' will vary depending on the number of providers operating in the market for a particular product or service and their relative importance in and share of that market. The extent of fair analysis must be such that could

reasonably be expected of a professional conducting business, taking into account the accessibility of information and product placement to intermediaries and the cost of the search.

In order to ensure that the number of contracts and providers is sufficiently large to constitute a fair and personal analysis of the market, we will consider the following criteria:

- the needs of the customer,
- the size of the customer order,
- the number of providers in the market that deal with brokers,
- the market share of each of those providers,
- the number of relevant products available from each provider,
- the availability of information about the products,
- the quality of the product and service provided by the provider,
- cost, and
- any other relevant consideration.

Insurance based Investment Products

We are remunerated by commission for the advice we provide on our insurance based investment products.

Life & Pensions/Deposits & Life Wrapped Investments

We provide life assurance and pensions on a fair and personal analysis basis i.e. providing services on the basis of a sufficiently large number of contracts and product producers available in the market to enable us to make a recommendation, in accordance with professional criteria, regarding which contract would be adequate to meet your needs.

We will provide assistance to you for any queries you may have in relation to the policies or in the event of a claim during the life of the policy and we will explain to you the various restrictions, conditions and exclusions attached to your policy. However, it is your responsibility to read the policy documents, literature and brochures to ensure that you understand the nature of the policy cover; particularly in relation to PHI and serious illness policies.

Non-Life

We can provide advice on household insurance only. We provide general insurance advice on a limited analysis basis, i.e. providing services on the basis of a limited number of contracts within the market.

To ensure continuity of cover, where you have an existing policy which is due to expire and where we have been unable to contact you, we may put continuing cover in force whilst awaiting your instruction. You will be liable for any premiums payable to the relevant insurer for the period of time between renewal and when we receive your instruction. You have the right not to avail of this service.

Sustainability Factors –Insurance Based Investments/Pension Advice

In accordance with the Sustainable Finance Disclosure Regulation ('SFDR'), we inform you that when providing advice on investment and insurance-based investment products, we assess, in addition to relevant financial risks, relevant sustainability risks as far as this information is available in relation the products proposed/advised on. We review product provider literature in

relation to sustainability risks, we liaise with the providers in relation to any queries in relation to the funds. This information is reviewed by the firm on an ongoing basis.

Considering Principal Adverse Impacts on sustainability factors in the advice:

When providing advice on insurance-based investment products ('IBIPs') or investment advice we assess the Principle Adverse Impacts (PAI) information published by product manufacturers as follows: the firm will examine the Product Providers literature to establish the Principal Adverse Impacts for the relevant products. The firm will then compare financial products across available providers to make informed investment decisions about the suitability of ESG products for individual clients.

Statement of Charges

We may earn our remuneration on the basis of fee, commission and any other type of remuneration, including a non-monetary benefit or on the basis of a combination of these methods. A non-monetary benefit will only be accepted if it enhances the quality of the service to our clients.

You may choose to pay in full for our services by means of a fee. Where we receive recurring commission, this forms part of the remuneration for initial advice provided. We reserve the right to charge additional fees if the number of hours relating to on-going advice/assistance exceeds 5 hrs.

A summary of the details of all arrangements for any fee, commission other reward or remuneration paid or provided to us which have agreed with product providers is available in our office or on our website – www.oneplanfinancial.ie

In general we are remunerated by the provider we choose to place your business with but in certain circumstances, it will be necessary to charge a fee for services provided. These are listed below.

Financial Planning Consultation:	€220
Product Set up (where no commission is payable from provider):	€295

Regular Reviews

It is in your best interests that you review, on a regular basis, the products which we have arranged for you. As your circumstances change, your needs will change which may result in you having insufficient insurance cover and/or inappropriate investments. We would therefore advise that you contact us to ensure that you are provided with up to date advice and products best suited to your needs.

Conflicts of interest

It is the policy of our firm to avoid conflicts of interest in providing services to you. However, where an unavoidable conflict of interest arises we will advise you of this in writing before providing you with any service. A full copy of our conflicts of interest policy is available on request.

Complaints

Whilst we are happy to receive verbal complaints, it would be preferable that any complaints are made in writing. We will acknowledge your complaint in writing within 5 business days and we will fully investigate it. We shall investigate the complaint as swiftly as possible, and the complainant will receive an update on the complaint at intervals of not greater than 20 business

days starting from the date on which the complaint is made. On completion of our investigation, we will provide you with a written report of the outcome. In the event that you are still dissatisfied with our handling of or response to your complaint, you are entitled to refer the matter to the Financial Services and Pensions Ombudsman (FSPO). A full copy of our complaints procedure is available on request.

Data Protection

We are subject to the requirements of the General Data Protection Regulation 2018 and the Irish Data Protection Act 2018.

One Plan Financial 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.

The data will be processed only in ways compatible with the purposes for which it was given and as outlined in our Data Privacy Notice, this will be given to all our clients at the time of data collection. We will ensure that this Privacy Notice is easily assessible.

Compensation Scheme

We are members of the Investor Compensation Scheme operated by the Investor Compensation Company Ltd. See below for details.

Investor Compensation Scheme

The Investor Compensation Act, 1998 provides for the establishment of a compensation scheme and the payment, in certain circumstances, of compensation to certain clients (known as eligible investors) of authorised investment firms, as defined in that Act.

The Investor Compensation Company Ltd. (ICCL) was established under the 1998 Act to operate such a compensation scheme and our firm is a member of this scheme.

Compensation may be payable where money or investment instruments owed or belonging to clients and held, administered or managed by the firm cannot be returned to those clients for the time being and where there is no reasonably foreseeable opportunity of the firm being able to do so.

A right to compensation will arise only:

- If the client is an eligible investor as defined in the Act; and
- If it transpires that the firm is not in a position to return client money or investment instruments owned or belonging to the clients of the firm; and
- To the extent that the client's loss is recognised for the purposes of the Act.

Where an entitlement to compensation is established, the compensation payable will be the lesser of:

- 90% of the amount of the client's loss which is recognised for the purposes of the Investor Compensation Act, 1998; or
- Compensation of up to €20,000.

For further information, contact the Investor Compensation Company Ltd. at (01) 224 4955.

Brokers Ireland Clients' Compensation and Membership Benefits Scheme (BIC)

We are also members of the Brokers Ireland Clients' Compensation and Membership Benefits Scheme (BIC). Subject to the rules of the scheme the liabilities of its members firms up to a maximum of €100,000 per client (or €250,000 in aggregate) may be discharged by the fund on its behalf if the member firm is unable to do so, where the above detailed Investor Compensation Scheme has failed to adequately compensate any client of the member. Further details are available on request.

CUSTOMER PRIVACY NOTICE

At One Plan Financial we endeavour to ensure that the personal data of all our customers is collected and managed in line with the requirements of the GDPR and that our customers understand how their personal data is managed.

Our Responsibilities

1. The GDPR Officer at One Plan Financial is responsible for ensuring that this notice is made available to customers before we collect and/or process their personal data.
2. All Employees and Staff of One Plan Financial who engage with customers are responsible for ensuring that the customer is aware of this notice and that the customer's consent to the processing of their data has been secured and documented.

What is Personal Data?

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

What Personal Data does One Plan Financial hold about me?

The personal data that we may collect or process about you, our customer, can include the following: Contact information, including Name, Address, Phone and Email. Photo ID and Proof of Address Health / Medical information PPS number Financial Information (Bank details, policy numbers)

Why does One Plan Financial need my personal data?

One Plan Financial collects and uses your personal data to deliver the services which you have requested or subscribed to, for example retirement planning or financial management. All personal data given to us by you will be used only for the purpose for which you supply it and will be treated in accordance with General Data Protection Regulations.

We will only use your information so that we can provide a comprehensive service to you. This may include updates, advice and information relating to the services that you have requested or services which we believe would be beneficial to you.

At One Plan Financial we strive to improve the services and communications that we provide to our customers through the ongoing development of our IT systems and software. At times we use customer personal data to facilitate that development as follows:

- to gain a better understanding of our services, and to allow new product and service development; to tailor our services to allow us to meet customer needs
- to allow us to predict trends and produce market insights;
- to undertake modelling to identify improvements customer reporting and service delivery efficiencies;
- to store, access and backup information.

If you have given your consent to receive marketing material from us, we aim to provide you with information that is relevant and personal. By providing your personal data, and where you have agreed to receiving communications from us, we may also use the information as follows:

- to personalise the marketing information that we issue;
- to send information that we consider may be of interest to you;
- to collate data gleaned from surveys or to produce market insights;
- to segment and distribute targeted marketing materials;
- to follow up with attendees of our events
- to ask for opinions about our products or services.

Please notify us immediately of any changes in relation to your personal data so that we can ensure the accuracy of your personal data (eg change of address or telephone number).

Does One Plan Financial need all this personal data about me?

We only collect the data that we need to provide the service(s) that you have requested. We must collect sufficient personal data in order to identify you as an individual. The GDPR prevents us from collecting data which we do not need for legitimate purposes. We aim 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, disclosure or loss.

Lawful Basis for Processing Personal Data

The GDPR requires that we have to have a lawful basis for processing all personal data that we hold. We process all customer personal data in a manner that complies with the GDPR and in line with reasonable expectations. Our legal basis for processing your personal data is that you have explicitly given your consent to us. This consent can be given at the time when you initially seek our services, or having read the Customer Privacy Statement, that you consent to us processing the personal data you have supplied us. It is considered by One Plan Financial, to be reasonable to use customer personal data for the legitimate interests of our business relationship or potential relationship with our customers. Where necessary, in limited circumstances and in accordance with the law we may use customer personal data in the defense of legal claims.

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for One Plan Financial to process personal data. Where we are asking you for sensitive personal data we will always request your consent before processing. You may withdraw consent at any time by contacting our GDPR Officer. Who will One Plan Financial share my personal data with?

We may also share your details with third parties in order to fulfil our contractual, legal and regulatory obligations. These third parties may include, but not be limited to, Accountant, Solicitor and other Business Advisors, Subcontractors, Consultants or Professional Services providers and IT Services providers.

All Third Parties engaged by One Plan Financial must comply with the General Data Protection Regulations. When they no longer need your data to fulfil this service, the third parties will dispose of your personal data in line with One Plan Financial's procedures. If we wish to pass your sensitive

personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

Your personal data will not be shared for marketing purposes without your consent. In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. One Plan Financial has safeguards in place to ensure the security of your data in the event that such a transfer takes place.

How long will One Plan Financial keep my personal data?

One Plan Financial will only retain personal data for as long as it is needed for the purpose for which it was collected. Once the retention period for a record has passed, that record is deleted from our systems. In some instances, One Plan Financial is required to retain information in accordance with the law, such as information needed for Revenue and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

What are my rights in relation to my personal data once I give it to One Plan Financial?

At any point whilst we are storing or processing your personal data, you as 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. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.
- 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 One Plan Financial refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the complaints section below.

All requests will also be forwarded to any third party who is in the processing or storage of your personal data.

How can I find out the personal data One Plan Financial holds about me?

One Plan Financial at your request, can confirm what information we hold about you and how it is processed. If One Plan Financial does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of One Plan Financial or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide to prove that I am the data subject?

One Plan Financial accepts the following forms of ID when information on your personal data is requested: Passport, Driving licence, Utility bill (not older than 3 months), Bank statement (not older than 3 months), Revenue / Social Welfare documentation (not older than 3 months).

How do I make a complaint?

If you wish to make a complaint about how your personal data is being processed by One Plan Financial, by third parties engaged by One Plan Financial, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and One Plan Financial's GDPR Officer.

One Plan Financial GDPR Officer

If you have any queries or concerns about your personal data, our GDPR Officer can be contacted in the following ways: By Letter GDPR Officer One Plan Financial, 4 Crestfield Centre, Glanmire, Cork
Telephone: 021-4858400 Email: info@oneplanfinancial.ie

Supervisory Authority

Data Protection Commissioner of Ireland, Office of the Data Protection Commissioner
Address: Canal House, Station Road, Portarlinton, Co. Laois, R32 AP2 Ireland.
Telephone: +353 (0761) 104 800 or LoCall 1890 25 22 31
Email info@dataprotection.ie