

# Data Privacy Notice

Future Wealth Limited, trading as Starlight Wealth, ("**Starlight Wealth**") is committed to protecting and respecting your privacy. We wish to be transparent in how we process your data and show you that we are accountable with General Data Protection Regulation 2016 (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 Future Wealth Limited. Our contact details are: Robin Hill, Glen Road, Delgany, Co. Wicklow, Greystones, Wicklow, Ireland, A63 VH73

When we refer to we/us, we mean Starlight Wealth.

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?

Future Wealth Limited, trading as **Starlight Wealth**, is regulated by the Central Bank of Ireland (the "Central Bank") as an Investment Intermediary under the Investments Intermediaries Act, 1995 and is registered as an Insurance Intermediary under the European Union (Insurance Distribution) Regulations, 2018 under institution authorisation code C496326.

Starlight Wealth offers a self-directed advisory investment account and a Personal Retirement Savings Account (PRSA, subject to regulatory approval), whereby clients can invest directly in regulated equities, bonds and exchange traded funds (ETFs) or can choose to allocate funds to Starlight Model Portfolios (both subject to suitability).

Starlight Wealth will work directly with clients to open an account over the phone, email, web messaging, face to face and/or in a virtual meeting. The account will then be primarily managed directly by the client using digital channels, including funding the account, submitting investment instructions and withdrawing funds.

Our Data Protection Officer can be contacted directly here:

- Name: Alex McKnight
- Email address: alex@starlightwealth.ie

## How do we collect your information and what information do we collect?

The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data.

Our organisation collects personal data in the following ways, if you:

- request a service from us, for example you wish to open a Starlight Smart Account or Starlight PRSA Account;
- register with us, subscribe to our newsletter or use any of our websites or online applications;
- use our website/apps and it installs cookies or other tracking technologies onto your device;
- engage with us on social media, for example following us on Twitter or Instagram;

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- contact us with a complaint or query;
- apply for a position with us;

### What information do we collect?

The information we collect about you *may include without limitation* the following examples, depending on the product or services you are requesting from us:

1. Contact and Identifying information: e.g., your name, address, contact details, email, mobile, landline, photo ID and proof of address. We are required to undertake certain checks in relation to sanctions and money laundering to meet our legal obligations. We will also require your contact details to enable you to access and manage any products you open with us
2. Unique identifiers: e.g.,
  - PPS number: we require this if you wish to open a PRSA account
  - Pension scheme reference number: we require this to transfer in an existing pension
3. Demographic details: e.g. your age, gender, marital status, date of birth, dependents, , as well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. e.g., your children/spouse. We are generally required to undertake a detailed Fact Find prior to offering you a product or service. The level of information gathered will be dependent on the nature and complexity of the product or service but must include details of the your investment needs & objectives, personal circumstances, financial situation and attitude to risk.
4. Family and Beneficiary Data: e.g., dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant. This information is necessary for our Fact Find (see above) and to ensure we can manage your account in accordance with your wishes or circumstances.
5. Employment information: e.g., your role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history. This information is necessary for our Fact Find (see above).
6. Publicly available sources: e.g., Information about you in the public domain such as Director information from the Companies Registration Office. We are required to undertake certain checks in relation to sanctions and money laundering to meet our legal obligations.
7. Pensions and Insurance Benefits information e.g., current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, Pension Adjustment Orders.

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8. Financial details e.g., bank account details, details of your credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details
9. Marketing preferences: we will only send you direct marketing if you explicitly consent.
10. Searches that we are required to undertake in relation to sanctions, money laundering and credit checks to meet our legal obligations
11. Calculators on our website. We use this data to perform calculations to show you investment or pension growth illustrations, based on contribution and investment choices you make

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

#### **What information do we automatically collect?**

We sometimes automatically collect certain types of information when you visit our websites and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your expressed consent.

#### **How do we use your personal data?**

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for our products and services.

1. Performing services for our clients and prospective clients: when you require investment or pension products, we use your data to enable us to provide the required product which may require us to share data with third party product producers and service providers
2. Statutory and other regulatory requirements: we are required to carry out various obligations which may include:
  - AML (anti money laundering) and Sanction checking
  - Knowing your customer, to carry out a "Fact Find" before offering you a product or service
  - Adherence to the Consumer Protection Code
  - Provision of regulatory required documents, including Annual Investment Statements, Key Information Documents (KIDs) and Pension Benefit Statements
3. Communicating and marketing to you: which may include:
  - To provide you with information to use your product or service
  - To communicate new products or services to you if you have given us your consent
4. To contact you if required or to respond to any communications that you might send to us.

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5. To administer our site including data analysis, testing, research, statistical and survey purposes.
6. To carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.
9. To provide professional services: for example, to provide you with professional financial advice
10. Handling complaints: see our website for our complaints process
11. To notify you about changes to our service: including changes to our Terms of Business, fees or investment options

### Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data.

Performance of a contract	When we enter into a contract with you, we will collect and use your personal data to enable us to fulfil the service under the contract.
Legal obligation	The use of some of your personal data is necessary for us to meet our legal obligations e.g., pension contributions for Revenue Certificates, regulatory purposes to the Central Bank.
Consent	Sometimes we may rely on consent as a legal basis for processing your information. For example, we rely on consent to collect and use personal data for verifying your identity. We may share this information with other third parties where it is necessary to manage these services provided to you. We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time. Sometimes if you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.
Legitimate interests	Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.

### How do we share your data ?

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place standard contractual clauses and confidentiality agreements.

1. Vetting and risk management agencies such as identity verification, credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies,

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- where necessary to prevent and detect financial crime or fraud in the investment industry and take steps to assess the risk in relation to prospective or existing products or services.
2. Legal advisers, loss adjusters, and claims investigators, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature;
  3. EU Law enforcement bodies, when required to do so by law and/or regulation, or another legal request.
  4. Public authorities, regulators and government bodies, where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity.
  5. Third-party processors: We outsource our processing operations to suppliers that process personal information on our behalf. Examples include IT service providers who manage our IT and back-office systems and telecommunications networks, and accounting and payroll providers, CRM providers.  
These processing operations remain under our control and we have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.
  6. Internal and external auditors where necessary for the conduct of company audits or to investigate a complaint or security threat.
  7. On the sale or reorganisation of our business whether by asset or share disposal or other transaction relating to our business.

### **Retention of Data**

We shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary. We may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject. Personal data will be disposed of securely.

### **Data Subjects Rights**

We will facilitate your rights in line with our data protection policy. This is available on request.

### **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. (The erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).

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.

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Right to make a complaint: if we refuse your request under rights of access, we will provide you with a reason as to why.

All 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.

### Complaints

If you wish to make a complaint about how your personal data is being processed by Future Wealth or how your complaint has been handled, you have the right to lodge a complaint with our Data Protection Officer.

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.  
D02RD28

Web: [www.dataprotection.ie](http://www.dataprotection.ie)  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
See website for updated contact details to reach the appropriate section within the DPC.

### Failure to provide further information

If we are collecting your data for a contract and you cannot provide this data, the consequences of this could mean the contract cannot be completed or details are incorrect. When you fail to provide us with information we require in order to fulfil our obligations to you, we may be unable to offer our services to you.

### Profiling & Automatic Decision Making

An automated decision is when we input your personal data into a computer programme and this programme analyses your personal data to provide us with a result. There is no human involvement in the decision making. Examples of this include: when we generate an investment risk appetite score for you based on your responses to questions; automated PEP or sanctions screening; affordability checks. If a decision is taken by automated means, you have the right to object to this and ask us to reconsider the service you have asked us to provide.

### Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us by email at [contactus@starlightwealth.ie](mailto:contactus@starlightwealth.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.