

Privacy policy

1. Introduction

- Allen Retirement and Finance Limited, trading as ARF ('ARF' or 'our', 'us', 'we') having its registered office at 8 Sandford Road, Dublin 6 (company registration number 329160) is committed to protecting and respecting your privacy.
- 2. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 3. For the purpose of European Union and Irish data protection law (the Acts), we are the data controller. Our email address is support@arf-pensions.com. Our nominated representative for the purpose of the Acts is Ralph Benson.
- 4. By using our Services you are deemed to fully accept this Privacy Policy and the associated Terms and Conditions of Service.

2. Information we may collect from you

- 1. We may collect and process the following data about you:
 - 1. Information you give us
 - 2. You may give us information about you by filling in forms on our site, www.arf-pensions.com or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our site, subscribe to our service, and when you report a problem with our site. The information you give us may include your name, address, email address and phone number, financial information, personal description and photograph.
 - 3. Any data about you or other individuals you enter onto our website directly or include in any message to us will be subject to the Acts and you are responsible for its accuracy and relevance and must have the authority to disclose it and for us to utilise it for the purposes of any transaction concluded for or by you through this website.
 - 4. If you contact us, we may keep a record of that correspondence.
- 2. Information we collect about you

- 1. With regard to each of your visits to our site we may automatically collect the following information:
- technical information, including the Internet protocol (IP)
 address used to connect your computer to the Internet, your
 login information, browser type and version, time zone
 setting, browser plug-in types and versions, operating
 system and platform;
- 3. information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages and information viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- 3. Information we receive from other sources
 - We may receive information about you if you use any of the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We also work with third parties (including, for example, investment providers, sub-contractors in technical services, advertising networks, analytics providers, search information providers) and may receive information about you from them.
- 3. Uses made of the information
 - 1. By agreeing to these terms and conditions you give your consent to the collection, use and retention of your data for our legitimate business purposes as explained in this Privacy Policy. We collect, use and retain information about you only if we reasonably believe it is justified, required and useful in order to conduct our business effectively and to provide you with information and advice about products and services we believe will be of interest to you.
 - 2. We maintain appropriate security standards and procedures in relation to the collection, use and retention of your information in order to prevent unauthorised access or disclosure.
 - 3. We use information held about you in the following ways:
 - 1. Information you give to us

- 1. We will use this information:-
 - to provide our investment advisory services and assess the suitability of third party investment products for you;
 - 2. to provide you with information about third party investment products;
 - 3. to notify you about changes to our service;
 - 4. to ensure that content from our site is presented in the most effective manner for you and for your computer.
- 2. Information we collect about you
 - 1. We will use this information:-
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - 2. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our service, when you choose to do so;
 - 4. as part of our efforts to keep our site safe and secure:
 - 5. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - 6. to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- 3. Information we receive from other sources
 - We may combine this information with information you give to us and information we collect about you. We may us this information and the combined information for the purposes set out above (depending on the types of information we receive).

4. Disclosure of your information

- We may share your personal information with any subsidiary or holding company, as defined in sections 7 & 8 of the Companies Act, 2014, if any from time to time.
- 2. We may share your information with selected third parties including:-
 - 1. Investment product providers in order to properly assess the suitability of their products for you.
 - 2. Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in Dublin). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
 - 3. Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- 3. We may disclose your personal information to third parties:-
 - In the event that we sell any of our business or assets or merge with another business, we may disclose your personal data to the prospective buyer of such business or assets to the extent required for the transaction and subject to the receiving party being bound by covenants of confidentiality in respect of such data.
 - 2. If ARF is sold or merges with another business or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 4. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of ARF, our customers, or others. This includes exchanging information with

other companies and organisations for the purposes of fraud protection and credit risk reduction.

5. Where we store your personal data

- 1. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. Any such transfers of personal data outside of the EEA will comply with the requirements of the Acts.
- 2. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- 3. All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 4. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

6. Your rights

- 1. You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us.
- 2. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you

- follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.
- 3. You may inform us of any changes to your personal data and in accordance with our obligations under the Acts we will update or delete your personal data accordingly.

7. Access to information

1. The Acts gives you the right to access information held about you. Your right of access can be exercised in accordance with the Acts.

8. Changes to our Privacy Policy

 Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy. By using our Website you agree to be bound by our Privacy Policy and any revisions in effect at the time of its use.

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