



WEBSITE PRIVACY NOTICE

This is the website privacy notice of Spry Finance, the retail division of Seniors Money Mortgages (Ireland) DAC, trading as Spry Finance and Seniors Money. In this document, "we", "our", or "us" refer to Spry Finance.

We are company number 409589 registered in the Republic of Ireland.

Our registered office is at Marine House, Clanwilliam Place, Dublin 2, D02 FY24.

Introduction

1. This is a notice to inform you of our policy about all information that we record about you on our website. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us and hope that you reciprocate.
5. Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).
6. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. Information we process because we have a contractual obligation with you

At present, our website does not collect data that requires a contract be formed between you and us.

When you enter into a Lifetime Loan with us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- 1.1. verify your identity for security purposes;
- 1.2. provide you with our products and services; and
- 1.3. provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at info@spryfinance.ie. However, if you do so, it may limit your ability to use our website or our services further.

3. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means;
- whether processing (or not processing) might cause you harm; and
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our website;
- responding to unsolicited communication from you to which we believe you would expect a response;
- protecting and asserting the legal rights of any party;
- insuring against or obtaining professional advice that is required to manage organisational risk; and
- protecting your interests where we believe we have a duty to do so.

4. Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

Specific uses of information you provide to us

5. Sending a message or enquiry to our support team

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of Spry Finance.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

6. Complaining

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Use of information we collect through automated systems when you visit our website

7. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use. When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- 7.1. to register your visit to our website,
- 7.2. to track your privacy preference settings (i.e. your cookie consent), and
- 7.3. to analyse how you use our website.

8. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

9. Our use of re-marketing

We currently do not use any form of re-marketing. We do not advertise our products and services on third party websites based on the pages on our website that you may have visited.

Disclosure and sharing of your information

10. Information we obtain from third parties

We do not disclose your personal information received through our website to any third party (except as set out in this notice). Nor, do we receive data that is made up from your personal information from third parties.

11. Third party advertising on our website

At present, third parties do not advertise on our website.

12. Data may be processed outside the European Union

The Spry Finance website is hosted in Europe.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business. For example, Lifetime Loan application and settlement details are stored in New Zealand with Seniors Money Mortgages (Ireland) Limited's loan account management systems provider. Data is also stored on Salesforce

CRM systems providers in Europe. Accordingly data obtained within Ireland or any other country could be processed outside the European Union.

We use the following safeguards with respect to data transferred outside the European Union:

- 12.1. the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- 12.2. the data protection clauses in our contracts with data processors include strict transfer clauses relating to protection of your information.

Access to your own information

13. Access to your personal information

- 13.1. At any time you may review or update personally identifiable information that we hold about you.
- 13.2. To obtain a copy of any personally identifiable information that we hold about you, you may send us a request at info@spryfinance.ie.
- 13.3. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

14. Removal of your information

We do not display any personally identifiable information about you on our website. However, if you wish us to remove personally identifiable information from any of our systems, you may contact us at info@spryfinance.ie.

15. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

16. Use of site by children

- 16.1. We do not sell products or provide services for purchase by children, nor do we market to children.
- 16.2. If you are under 18, you may use our website only with consent from a parent or guardian.

17. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

18. How you can complain

- 18.1. If you are not happy with our privacy policy or if you have any complaint then you should tell us by email. Our email address is info@spryfinance.ie.
- 18.2. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 18.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Data Protection Commissioner.
- 18.4. This can be done at:
<https://www.dataprotection.ie/docs/complaints/1592.htm>

19. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 19.1. to provide you with the services you have requested;
- 19.2. to comply with other law, including for the period demanded by our tax authorities; and
- 19.3. to support a claim or defence in court.

20. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

21. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at: info@spryfinance.ie.