

Privacy Policy

Privacy Statement

As our client, or a visitor to our website, we are pleased to outline the Mel Shanley T/A Quantum Life Ireland (Quantum) Privacy Statement. Quantum *respects your privacy and is committed to* protecting your personal data. This Privacy Notice is issued on behalf of Quantum and its subsidiaries including www.associationgroupscheme.ie, so when we mention "Quantum", "we", "us" or "our" in this Privacy Statement, we are referring to the relevant entity responsible for processing your data. This Privacy Statement will inform you as to how we look after your personal data in compliance with our legal obligations under the EU General Data Protection Regulation and Irish Data Protection Legislation when you visit our website and tell you about your privacy rights and how the law protects you. Please read this statement carefully to understand how and why we use your personal information. If you provide us with personal information about someone else, please make sure that you have their permission to do so. You should also make them aware of this statement, as it will apply to them.

Third Party Link Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Information we may collect about you We collect and process different types of personal information. Dependant on your choice of product or service, the type of personal information and method of collection will vary. We need to be able to contact you, confirm your identity and gather your personal information to ensure we deliver the best possible customer experience when providing products and services. You may choose to give us your personal information through various mediums by accessing our website, by filling in forms and corresponding with us by phone, email or otherwise. The personal information we may collect about you includes but is not limited to the following:

- Identity Data includes first name, maiden name, last name, username or similar identifier, title, date of birth, gender and your Personal Public Service number.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account details.

- Transaction Data includes details about payments to and from you and other transactions you may have undertaken with us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, your investment experience, your financial investment details, and investment preferences, feedback and survey responses.
- Usage Data includes information about how you use our website.
- Marketing and Communications Data includes your preferences in communications and information provided voluntarily in surveys we may undertake
- Information relating to your employment and/or business history relating to persons connected to you relevant to disclosing and managing conflicts of interests or other legal and regulatory requirements.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law where this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Statement. We may also collect, store and use the following Special Categories of more sensitive Personal Information:

- Information about your nationality or ethnicity which may include where we are required to collate this by relevant governmental authorities or in order to comply with our legal and regulatory obligations.
- Information about criminal convictions and offences where required by applicable law or regulation, to comply with our internal compliance requirements or where required by applicable law. We may only use information relating to criminal convictions where the law allows us to do so.

This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with this Privacy Policy.

- Information about your trade union membership, politics or other Special Categories of Personal Data, we do not actively search for this information but where it forms part of searches we have undertaken to discharge our regulatory obligations or has been provided to us by you it may be retained.
- Information about any disability or other health factor(s) that are applicable to you where you interact with us and which would include where you are a visitor to our premises or guest to an event that we are arranging and have special requirements whether access, dietary or otherwise.
- Information about your employment and/or business history including professional relationships, consultancies, directorships, trusteeships, interests in unlisted shares and landholdings or entities where a beneficial ownership interest is held.
- Information relating to your employment and/or business history relating to persons connected to you relevant to disclosing and managing conflicts of interests or other legal and regulatory requirements.
- Except where we have referred to it in this section, it is unlikely that we will process Special Categories of Personal Information about you, for example, information relating to your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation.

You may decide you do not want to share your personal information with us but doing so may limit the products and services we are able to provide you. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to discontinue a transaction you have asked us to complete, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you. Direct interactions where you may give us your Identity, Contact and Financial Data filling in forms or by corresponding with us by post, phone, email, or otherwise and include when you:(a) make an enquiry online;(b) request to open an account in person or online by email or on our website;(c)

provide information as a client of Quantum in connection with the provision of services to you which may be collected through our websites www.quantumlifeireland.com or www.associationgroupscheme.ie and client links within this website.(d) subscribe to our publications;(e) request marketing to be sent to you;(f) submit a query through the Contact Us page on our website(g) complete surveys on our website(h) contact us by phone, calls may be recorded to ensure that we carry out client instructions correctly, to help us improve the quality of our service and in the interests of security. Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Third parties or publicly available sources. We may receive personal data about you from various third parties analytics providers such as Google.

Cookies and information collected from your computer

When you visit our website, our server may record your IP address for the purposes of systems administration. In most cases, your IP address is not linked to any of your Personal Information, but in limited circumstances (e.g. if you log into restricted parts of our website), your IP address can be linked to your Personal Information. Quantum may also gather other non-personal information from you (from which Quantum cannot identify you), such as the type of your internet browser, which Quantum uses to provide you with a more effective service.

What are cookies?

A cookie is a small piece of information which is transferred to your computer's hard disk from a website. Cookies can store information about your preferences and other information which you need when you visit the website. Cookies are not used to identify a visitor's personal identity.

How does Quantum use cookies?

Cookies remember your preferences on the Quantum website Session cookies allow users to be recognised within a website so any page changes or item or data selection you do is remembered from page to page. We use session cookies which only last for your online session and disappear from your computer or device when you close your browser.

Use of cookies in emails

When we send an email as part of one of our mailing list services, the email may include cookies and similar technologies to help us better understand how subscribers interact with our emails, such as whether they are opened by the subscriber. Any such emails that use these technologies will contain a clear notice indicating that this technology is in use. If you do not consent to us setting these cookies, please unsubscribe from the mailing list using the instructions provided in the email and delete any related mailing list emails that you have received.

How to refuse the use of cookies

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

Analytics

Quantum uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses cookies that gather information on how visitors use our website. By matching an anonymous, randomly generated identifier, we can record specific browsing information such as how you arrive at the site and the pages that you view. We use this information to discover which pages are popular or where users have difficulties, and analyse this to help us make improvements to our sites. Further details on the use of cookies by Google Analytics, and on how to opt out. To learn more about how online advertising works, visit the Network Advertising Initiative. You can opt out of Google's use of cookies by visiting Google's Ads Settings.

How we use your personal data

We need to collect and use personal information to provide you with products and services. We will only collect, utilise and share your personal information in strict adherence with our legal obligations. We use your personal information to: provide products and services to you; identify ways in which we can improve products and services; maintain and monitor products and services; • protect both our interests; comply with legal and regulatory obligations; check against financial sanctions, PEP, crime and terrorism hits; recommend how products and services might be suitable for you; and manage and respond to your complaints. If, at any time, we need to use your personal information for a purpose that is different from the original purposes of collecting the personal information, we will

contact you. Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us at mel@quantumlifeireland.com

General marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

(a) We may use your Identity, Contact and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

(b) You may receive marketing communications from us if you have requested information from us, received a product or service from us, or if you provided us with your details and have not subsequently opted out of receiving that marketing.

Opting out:

(a) You can ask us to stop sending you marketing messages at any time by contacting us at any time at mel@quantumlifeireland.com.

(b) Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase of a product or service.

Cookies:

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose:

(a) We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at mel@quantumlifeireland.com.

(b) If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

(c) Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of your personal information

Quantum may disclose your Personal Information to any company affiliated or associated with Quantum for the uses and purposes set out above. We may disclose your personal information with: your authorised representatives; joint applicants when you apply for our services on a joint basis; third parties we need to share your personal information with to facilitate the provision of products and services on your behalf e.g. other investment firms, investment managers, life offices and guarantors; third party service providers with whom we have data processing agreements in place to protect your personal information e.g. IT service providers independent third parties as follows: to third party service providers such providing customer service, email delivery, auditing, hosting our website, our marketing activities and other services; to third parties involved with events that you register for, to facilitate your participation in those events; in order to enforce or apply our website terms of use, or to protect the rights, privacy, safety or property of Quantum, our clients, affiliates or other parties; in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); and in accordance with the separate terms and conditions of use that may attach to Quantum website links. Legal and regulatory bodies e.g. the Revenue, An Garda Síochana, the Pensions Authority, the CBI, the Financial Services and Pensions Ombudsman, etc. In certain circumstances, Quantum may be obliged to disclose personal information relating to you to third parties without notice to you, for example, in order to conform to a legal or regulatory requirement; to comply with a legal process; to carry out our duties under our Terms and Conditions; or to assert, protect or defend the rights of property of Quantum or any of our customers. Otherwise, we will only share your personal data with third parties with your written consent.

Data Security

Within Quantum your personal information will be transmitted and stored in a protected environment. We keep our computers, files and building secure. We take measures

reasonably designed to protect your personal information from loss, misuse, unauthorised access, disclosure, alteration or unlawful destruction.

Data Retention

We do not hold your personal information for longer than is necessary. We hold your personal information while you are our customer and for a period after that relationship ceases, as permitted by law e.g. 6 years under the Statute of Limitations Act 1957. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Legal basis for using your person information

To use your personal information lawfully, we rely on one or more of the following legal bases: • performance of a contract i.e. processing your personal information is necessary for us to provide you with products and services; • we must process your personal information to comply with our legal obligations under MiFIR, AML law, Pensions law, etc.; • our legitimate interests i.e. the interests of Quantum in conducting and managing our business when providing products and services; and • your consent (which you may withdraw at any time).

Why we may need your consent and how you can withdraw it?

Sometimes we need your consent to use your personal information. If we process your personal information based on consent, you have the right to withdraw that consent at any time by contacting us directly at mel@quantumlifereiland.com or by selecting 'unsubscribe' link where relevant. With marketing for example, we need your consent to make you aware of products and services which may be of interest to you. New customers can opt-in to receive our marketing material.

Is your personal information transferred outside the EEA?

Your personal information is processed and stored within the European Economic Area (EEA). We may transfer your personal information to our service providers or other organisations outside of the EEA but only if they agree to act solely on our instructions and

protect your personal information to the same standard that applies in the EEA (where relevant, a copy of EU Model Clauses are available on request).

Your Legal Rights

You have the right to:

- request a copy of your personal information;
- request that we correct or update your personal information;
- restrict our use of your personal information;
- object to our use of your personal information;
- request we transfer your personal information in digital form; and
- request we delete your personal information.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights).

This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We generally do not charge you a fee when you request a copy of your personal information. However, if your request is deemed excessive or manifestly unfounded, we may choose to refuse your request or we may charge a reasonable fee to cover the additional administrative cost. We are obligated to act without undue delay, in most instances we will respond within one month of receipt of your request. This period may be extended by a further two months, we will notify you of any extension and the reason for the delay within one month of receipt of your request. Your right to obtain personal information can not adversely affect the rights and freedoms of others. Therefore, we can not provide personal information about other people without their consent.

Who can I make a complaint to?

Our Head of Compliance is responsible for the investigation of complaints. You also have the right to make a complaint to the Data Protection Commission. The most effective and efficient way to contact the Data Protection Commission regarding queries or complaints is by means of the webforms available on their website

<https://forms.dataprotection.ie/contact>. Contact details for the Data Protection

Commission are also available on their website

<https://www.dataprotection.ie/en/contact/how-contact-us>. **How to contact us?** If you have any complaints or questions about how your personal information is gathered, stored, shared or used, or if you wish to exercise any of your data rights, you may contact us at:

Kilminion South, Dungarvan, Co. Waterford X35 CF65

T+353 58 89132

E-mail: mel@quantumlifereiland.com

Website: www.quantumlifereiland.com

Disclaimer

Quantum, its directors, employees, agents, affiliates or other representatives and their respective parent and associated companies, shall not be liable in respect of any claims, emergencies, demands, causes of action, damages, losses, expenses, including without limitation, reasonable legal fees and costs of proceedings arising out of or in connection with the use and/or dissemination of personal information relating to you in accordance with this privacy and cookies statement and your consents. Any external links to other websites are clearly identifiable as such; we are not responsible for the content or privacy practices of other websites.

Amendments to our Privacy Statement

From time to time, we may change our privacy statement and post those changes to our website located at www.quantumlifereiland.com. The effective date of this privacy statement, as indicated at the end of this privacy statement, indicates the last time this privacy statement was revised or materially changed. Checking the effective date below allows you to determine whether there have been changes since the last time you reviewed the notice. Quantum reserves the right to amend this privacy statement at any time.

Effective as at August 27th 2025