

Privacy Statement & Cookie Policy

AEM Financial Planning

Version 2.0 | Last Reviewed: March 2026 | Next Review Due: March 2027

About Us

AEM Financial Planning provides independent financial planning services to consumers and businesses, including retirement planning, protection, and investments.

We are based at:

Office 4, The Creative Dock Studio, Malahide Marina, Co. Dublin, K36 W540

Data Controller Details (GDPR Art. 13)	
Data Controller	Aaron McCann trading as AEM Financial Planning
Address	Office 4, The Creative Dock Studio, Malahide Marina, Co. Dublin, K36 W540
Telephone	086 818 9322
Email	aaron@aemfinancial.com
Website	https://aemfinancial.com
Registered with	Central Bank of Ireland

GDPR Owner / Data Protection Contact	
Name	Aaron McCann
Email	aaron@aemfinancial.com
Telephone	086 818 9322

When we refer to 'we', 'us' or 'our' in this notice, we mean AEM Financial Planning / Aaron McCann.

Please read this Privacy Statement carefully as it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

2. How We Collect Your Personal Data

We collect personal information in the following ways when you:

- Request a financial planning service, product quotation, or advice from us;
- Complete a fact find, application form, or questionnaire with us;
- Contact us by telephone, email, or through our website contact form;
- Visit our website — which may place cookies on your device (see Cookie Policy below);
- Apply for a position with us;
- Engage with us through social media channels such as LinkedIn.

We may also obtain information about you from third parties such as product providers, underwriters, public registers (e.g. Companies Registration Office), sanctions/AML databases, and credit reference agencies.

3. What Personal Data We Collect

The personal information we collect varies depending on the nature of the service. The table below sets out the categories of data we typically collect and why:

Category	Examples	Why We Collect It
Contact & Identity	Name, address, email, phone, date of birth, photo ID	To identify you and communicate with you
Unique Identifiers	PPS number, policy reference numbers, pension scheme references	Required for regulatory compliance, pension/insurance administration and Revenue reporting
Demographic Details	Age, gender, marital status, dependants, lifestyle information	To complete fact-find and assess suitability of products
Family & Beneficiary Data	Dependants, next of kin, nominated beneficiaries, Power of Attorney	To arrange and administer insurance and pension policies
Employment Information	Role, employment status, salary, employment history	Required for fact-find and product suitability assessment
Health Information	Medical history, health status, smoking/alcohol habits, disability	Required for life cover, income protection and health insurance quotations and applications — see Special Categories section
Financial Details	Bank account details, credit history, salary, tax code, assets and liabilities	To assess affordability and arrange financial products
Pensions & Insurance	Current benefits, pension entitlements, retirement date, PAO details	To provide pension and retirement planning advice
Claims Data	Information from you and relevant third parties relating to a claim	To process and manage insurance claims
Online & Cookie Data	IP address, browsing behaviour on our website	Website analytics and functionality — see Cookie Policy
Criminal Records	Existence of or alleged offences (where relevant to a policy)	Required for certain insurance risk assessments only — not collected unless necessary
AML / Sanctions Searches	PEP, AML and sanctions check results	To meet our Anti-Money Laundering legal obligations
Marketing Preferences	Communication preferences and consent records	To send you information about relevant products and services (with your consent)

When we collect sensitive personal data (special categories), we ensure we have your explicit consent and/or rely on applicable law — see Section 9 below.

4. How We Use Your Personal Data

We use your personal data for the following purposes:

#	Purpose	Legal Basis (GDPR Art. 6)
1	Providing financial planning services and product recommendations	Performance of contract (Art. 6(1)(b))
2	Completing fact finds and assessing product suitability	Performance of contract (Art. 6(1)(b))
3	Setting up new accounts and managing billing	Performance of contract (Art. 6(1)(b))
4	Statutory and regulatory compliance (Central Bank, Revenue, AML/KYC obligations)	Legal obligation (Art. 6(1)(c))
5	AML, sanctions and PEP screening	Legal obligation (Art. 6(1)(c))
6	Handling complaints and queries	Legal obligation / Legitimate interests (Art. 6(1)(c)/(f))
7	Fraud detection and prevention	Legitimate interests (Art. 6(1)(f))
8	Processing and managing insurance or pension claims	Performance of contract (Art. 6(1)(b))
9	Notifying you of changes to our services	Legitimate interests (Art. 6(1)(f))
10	Direct marketing — email, phone, post or SMS about relevant products	Consent (Art. 6(1)(a)) — you may withdraw at any time
11	Website analytics and improvement	Consent (Art. 6(1)(a)) via cookie consent
12	Safeguarding vital interests (emergency situations)	Vital interests (Art. 6(1)(d))

Where we rely on legitimate interests as our legal basis, we have assessed that our interests do not override your rights and freedoms. You may contact us for further details of this assessment.

5. How We Share Your Personal Data

When required, we may share your information with third parties where they are providing services on our behalf or where we are legally required to do so. We will only provide those third parties with information that is necessary for them to perform their services.

Third Party	
Product Providers & Insurers	We share necessary data with product providers and insurance underwriters to arrange and administer policies. Providers include Aviva, Standard Life, Royal London, Irish Life, Zurich Life, New Ireland and others listed in our Terms of Business. Please refer to each provider's own privacy notice for details of their data practices.
Vetting & Risk Management Agencies	Credit reference, criminal record, fraud prevention and data validation agencies, where necessary to prevent fraud and assess insurance risk.

Third Party	
Medical Professionals	Where health information is required to assess risk for a life, health or income protection policy or to process a claim.
Legal & Claims Professionals	Legal advisers, loss adjusters and claims investigators where necessary to investigate or defend legal or insurance claims.
Regulatory & Law Enforcement Bodies	The Central Bank of Ireland, Revenue Commissioners, EU law enforcement bodies and other regulators or government authorities where required by law or in connection with suspected illegal activity.
Third-Party IT & Business Processors	Suppliers who process data on our behalf, including: RC Net IT (IT services), Broker Information Systems (back-office system), ITAS Accounting (accounting/payroll). Data Processing Agreements are in place with all processors.
Internal & External Auditors	Where necessary for annual audits of the firm or investigation of a complaint or security threat.
Business Sale / Reorganisation	In connection with any sale, merger or restructuring of our business.

We take measures to protect your information when sharing with third parties, including Standard Contractual Clauses and confidentiality agreements where appropriate.

6. Transferring Personal Data Outside Ireland

Your data is primarily processed and stored within the European Economic Area (EEA).

Where we transfer personal data to a country outside the EEA (a 'third country'), we ensure it is done lawfully and that an appropriate level of protection is in place. We will rely on an EU Commission adequacy decision or put in place appropriate safeguards such as Standard Contractual Clauses (SCCs) or Binding Corporate Rules (BCRs).

We share data with firms located in the United Kingdom — for example, life companies operating in Ireland with a UK parent company such as Aviva, Standard Life and Royal London. The EU Commission has adopted adequacy decisions for transfers of personal data to the UK, meaning the UK is not treated as a third country.

7. Security of Your Personal Data

The security of your personal data is important to us. We have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- Maintaining secure computer systems in line with legal requirements and international security guidance;
- Ensuring staff are trained on their data protection obligations;
- Regularly auditing our systems and processes for compliance;
- Protecting personal data against loss, unauthorised access, misuse, alteration and destruction.

We do not store any off-line personal data outside our secure systems.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the Data Protection Commission without undue delay and, where required, notify you directly.

8. How Long We Keep Your Data

We will not keep your personal data in a form that permits identification for longer than is necessary for the purposes for which it was collected.

Retention periods are determined by the type of data and the purpose for which it was obtained, including any statutory obligations. Key retention periods are set out below:

Data Category	Retention Period	Basis
Client files (insurance, protection, pension)	6 years from end of relationship	Regulatory (Central Bank)
AML / KYC records	5 years from end of relationship	Criminal Justice Act 2010
Claims records	6 years from settlement	Statute of Limitations
Accounting records	7 years	Companies Act / Revenue
Marketing consent records	Until consent withdrawn + 1 year	GDPR accountability
Website / cookie data	As per cookie consent settings	ePrivacy Regulations

Personal data will be disposed of securely at the end of the applicable retention period.

9. Special Categories of Personal Data

Certain categories of personal data are particularly sensitive and require extra protection under GDPR (Article 9). These 'special categories' include health data, biometric data, and data revealing racial or ethnic origin, religious beliefs, or criminal convictions.

As a financial services firm arranging life cover, income protection, serious illness and mortgage protection, we may collect the following special category data:

- Health and medical information — including medical history, health status, and personal habits such as smoking and alcohol consumption;
- Biometric or disability information — where relevant to a protection product;
- Criminal records information — where required for certain insurance risk assessments.

We will only collect special category data where:

- You have given us your explicit consent; or
- Processing is necessary for reasons of insurance or pension administration as permitted under the Data Protection Act 2018 (Schedule 1) and we have suitable safeguarding measures in place.

We will ensure that special category data is only shared with third parties (such as product providers and medical professionals) where strictly necessary to provide the service you have requested.

10. Automated Decision-Making and Profiling

We may use automated tools and processes when providing our services. An automated decision is one made by a computer programme that analyses your personal data without meaningful human involvement.

The following automated processes may be used:

Process	Description	Your Rights
Investment Risk Profiling	Automated calculators assess your attitude to investment risk based on your answers to a questionnaire, to inform pension and investment recommendations.	You may request human review of any profiling outcome.
AML / Sanctions Screening	Your details are automatically checked against PEP, AML and sanctions databases to meet our legal obligations.	This is a legal requirement; you may contact us if you believe an error has occurred.
Quotation Calculators	Online calculators use your personal data to generate indicative quotations for life, mortgage or pension products.	Quotations are indicative only and subject to human review before any contract is offered.

You have the right to object to automated decision-making that has a significant legal or similarly significant effect on you, and to request human review of any such decision. Please contact us using the details in Section 14 to exercise this right.

11. Your Rights as a Data Subject

As a data subject within the EEA, you have the following rights under GDPR:

Right	What It Means
Right of Access (Art. 15)	You may request a copy of all personal data we hold about you, free of charge, within one month of your request.
Right of Rectification (Art. 16)	You have the right to have inaccurate or incomplete data corrected.
Right to Erasure — 'Right to be Forgotten' (Art. 17)	In certain circumstances you may request that we delete your data. This right is subject to our other legal obligations (e.g. regulatory retention requirements).
Right to Restriction (Art. 18)	You may ask us to restrict the processing of your data in certain circumstances, such as where you contest its accuracy.
Right to Portability (Art. 20)	Where technically feasible, you may request that we provide your personal data in a structured, machine-readable format or transfer it to another controller.
Right to Object (Art. 21)	You have the right to object to processing based on legitimate interests or for direct marketing purposes. Where you object to direct marketing, we will stop processing immediately.

Right	What It Means
Right to Object to Automated Decision-Making (Art. 22)	You have the right to object to any decision made solely by automated means that has a significant effect on you, and to request human review.
Right to Withdraw Consent	Where processing is based on consent, you may withdraw that consent at any time without affecting the lawfulness of processing carried out before withdrawal.
Right to Complain	You have the right to lodge a complaint with the Data Protection Commission (see Section 13).

To exercise any of the above rights, please contact Aaron McCann at aaron@aemfinancial.com or 086 818 9322. We will respond within one month of receipt. We may need to verify your identity before processing your request.

All requests relating to third-party data held by us will be forwarded to the relevant third party where appropriate.

12. Failure to Provide Personal Data

Where we are collecting your data for the purpose of entering into or performing a contract, or to comply with a legal obligation, and you are unable or unwilling to provide the required information, we may be unable to provide the service you have requested, or the contract may not be capable of completion.

We will always inform you at the point of collection whether the provision of particular data is mandatory or voluntary, and the consequences of not providing it.

13. Complaints

If you are unhappy with how we have handled your personal data, please contact us in the first instance so we can address your concern:

- By email: aaron@aemfinancial.com
- By phone: 086 818 9322
- By post: Aaron McCann, AEM Financial Planning, Office 4, The Creative Dock Studio, Malahide Marina, Co. Dublin, K36 W540

You also have the right to lodge a complaint directly with the Data Protection Commission (DPC):

Data Protection Commission	
Address	21 Fitzwilliam Square South, Dublin 2, D02 RD28
Website	www.dataprotection.ie
Email	info@dataprotection.ie

Please refer to the DPC's website for up-to-date contact details for the appropriate section.

14. Contact Us

If you have any questions, comments or requests regarding this Privacy Statement, or wish to exercise any of your data subject rights, please contact:

Aaron McCann

AEM Financial Planning

Office 4, The Creative Dock Studio, Malahide Marina, Co. Dublin, K36 W540

Email: aaron@aemfinancial.com

Phone: 086 818 9322

15. Changes to This Privacy Notice

We will occasionally update this Privacy Statement. Any changes will be posted on this page and, where appropriate, notified to you by email or other contact details we hold for you. The 'Last Reviewed' date at the top of this document will be updated accordingly.

We encourage you to review this notice periodically to stay informed about how we protect your personal data.

Cookie Policy

Part 2 of this document — applies to the AEM Financial Planning website (aemfinancial.com)

What Is a Cookie?

A cookie is a small text file placed on your device (computer, tablet or smartphone) when you visit a website. Cookies help websites recognise your device on subsequent visits and remember information about your preferences and browsing behaviour.

Cookies can be either:

- Session cookies — stored temporarily in your device's memory while you browse. They are deleted when you close your browser.
 - Persistent cookies — stored on your device beyond a single browsing session, until they expire or you delete them. They may store preferences, log-in details and similar information.
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How We Use Cookies

We use the following categories of cookies on our website. Non-essential cookies will only be placed on your device with your prior consent, which you can manage through our cookie consent banner.

Cookie Category	Purpose	Consent Required?
Strictly Necessary	Essential for the website to function. Enables you to navigate the site and use its features. Cannot be disabled.	No — these are exempt from consent requirements.
Functionality	Remembers choices you make (e.g. language, region preferences) to provide a more personalised experience.	Yes — active opt-in required.
Performance / Analytics	Collects anonymous information about how visitors use the site (e.g. pages visited, time on site) to help us improve our website.	Yes — active opt-in required.
Targeting & Advertising	Used to understand how our advertising campaigns perform and to make them more relevant. Anonymous — do not identify you personally.	Yes — active opt-in required.

How to Control Cookies

You can control and delete cookies at any time through your browser settings. For guidance, visit www.aboutcookies.org. Please note that disabling cookies may affect the functionality of some parts of our website.

You can also manage your cookie preferences on our website at any time by clicking the cookie settings link in the footer of the page.

We do not use cookies to collect personal data for storage on our own systems.

Document Information

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