

# Terms of Business

EVERYTHING YOU NEED TO  
KNOW WHEN DOING  
BUSINESS WITH US





## Disclaimer

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This document encompasses all pertinent details concerning our partnership. It delineates crucial aspects such as the terms of our service, procedural methodologies, data privacy measures, and legal stipulations pertinent to our engagement. Your careful review of this documentation is essential, as it establishes the framework within which we will conduct business for you.

True Financial Ltd t/a True Wealth, LowQuotes, Low.ie & GetCancerCover is regulated by the Central Bank of Ireland. Reg No: 663000. Directors: Shane Tobin and Jessicka Tobin. Kea Lew Business & Retail Park, Portlaoise.

# Terms of Business

This Terms of Business are applicable from 24/03/2026 and set out the general terms under which we will provide business services to you and the respective duties and responsibilities of both us and you in relation to such services. Please ensure you read these terms thoroughly and if you have any queries, we will be happy to clarify them. If any material changes are made to these terms, we will notify you. We confirm these terms of business are up to date.

## Authorisation and Codes of Conduct

We confirm we are regulated by the Central Bank of Ireland. Our authorisation can be checked on the Central Bank of Ireland register at [www.centralbank.ie](http://www.centralbank.ie) or by calling them on 01-224 4000 to verify our credentials. Our reference code is C431634. We are also subject to the Consumer Protection Code, Minimum Competency Code and Fitness & Probity Standards which offer protection to consumers. These Codes can also be found on the Central Bank's website.

## Our Services

We are an Insurance, Investment and Mortgage Credit Intermediary business. Our principal business is to provide advice and arrange transactions on behalf of our clients in relation to life, pensions, investments & mortgage products. We are members of Brokers Ireland.

We provide advice on a "Limited analysis of the market" basis, which means we provide our services on the basis of a limited number of contracts and product producers/lenders that we have an agency with. We advise you, in our professional opinion, from that selection which will best suit your needs and objectives. While not tied to one product producer the services are not provided on the basis of a fair analysis of the market (i.e. all providers and products).

As part of the process when giving our clients advice on Investments we will need to gather information with regards your investment knowledge and experience, if this information is not provided, we will not be in a position to determine whether the product is appropriate for you.

See below list of Companies we have agencies with.

### Life & Investment Companies

Aviva Life & Pension Ireland DAC	New Ireland Assurance Co plc
BCP Asset Management DAC	Newcourt Retirement Fund Managers Ltd
Cantor Fitzgerald Ireland Ltd	Royal London Insurance DAC
Conexim Advisors Ltd	Standard Life International DAC
Greenman Investments	Zurich Life plc
Independent Trustee Co Limited	Irish Life Health

### Through Fairstone Assist Ltd we have access to the following lenders

AvantCard DAC  
Dilosk DAC T/A ICS Mortgages  
Finance Ireland Credit Solutions DAC  
Haven Mortgages Limited  
Nua Money Limited  
Permanent TSB plc  
Seniors Money Mortgage (Ireland) DAC  
The Governor and Company of the Bank of Ireland

## Mortgages

Through the lenders or other undertakings with which we hold an agency, we can provide advice on and arrange mortgage products from the following range: fixed-rate loans, we provide mortgage advice on mortgages from the selection of lenders we have agencies with. We will need to collect sufficient information from you before we can offer any advice on housing loans. This is due to the fact that a key issue in relation to mortgage advice is affordability. Such information should be produced promptly at our request. Where the creditor is unable to carry out an assessment of creditworthiness because the consumer chooses not to provide the information or verification necessary for an assessment of creditworthiness, the credit cannot be granted.

## Conflicts of Interest

It is our policy to avoid conflicts of interest in providing services to you. However, if an unavoidable conflict of interest arises, we will advise you of how this is being dealt with in writing before providing you with any service. Although we receive payment from the product Providers/Lenders for your business, we ensure the advice we recommend to you is in your best interest, plus it avoids you having to pay us a direct fee each year. A full copy of our conflicts of interest policy is available on request.

## Disclosure of Information

We act as your representative to the companies we have agencies with, and we will provide assistance to you with any queries you may have in relation to the policies or in the event of a claim during the life of the policies and we will explain to you the various restrictions, conditions and exclusions attached to your policy. However, it is your responsibility to read the policy documents, literature and brochures to ensure you understand the nature of the policy cover. Material information about medical history, non-smoker status, occupation category and any hazardous pursuits are central to underwriting decisions and it is imperative that all information you provide to the insurer is accurate and complete.

You are under a duty to answer all questions posed by the insurer or us on your behalf, honestly and with reasonable care. It is presumed, unless the contrary is shown, that you would know all questions in an application or at renewal are material to the risk undertaken by the insurer or the calculation of the premium by the insurer, or both. Any failure to disclose material information may invalidate a claim and render your policy void.

You must inform and disclose any material information including any material changes that might take place between the time you complete an application form and the time you pay the first premium. To assist us in providing you with a comprehensive service and to keep our records up-to date as soon as possible, please notify us of any changes to your personal circumstances, e.g. name change, change of address, etc.

## Sustainable Investing

We will gather your Sustainable Investing Preferences and principal adverse effects to the environment and include these preferences in our Statement of Suitability/recommendation for you. Ultimately, it is the Product Producers we have agencies with that produce the Investment Products we advise on, and it will be their documentation we are relying on when including Sustainable investments in your recommendation. All information re Sustainable Finance Disclosures will be adhered to by the Product Producers and their brochures and documents will outline their disclosures. We do not consider "adverse impacts of investment decisions" on sustainability factors in our investment advice.

## Complaints

We have a complaints procedure in place which is available on request. Your complaint can be in writing, email, telephone or face to face. If your complaint is face to face or by phone, we will write to you to confirm our understanding of your complaint. We will acknowledge your complaint within 5 working days if your complaint has not been sorted out within these 5 days, advising you of the name of the person dealing with your complaint on behalf of the company. We will update you on our investigation into your complaint within 20 working days and endeavour to have a final response for you within 40 working days. We will notify you if this timeline is not possible and inform you of the time it will take to provide you with a final response letter. Please address any complaint to Low.ie. If in the event, a complainant is dissatisfied with the outcome of our investigation, you are entitled to refer the matter to the Financial Services & Pensions Ombudsman, Lincoln House, Lincoln Place, Dublin 2, Lo calls 01 5677000 emails info@fsp.ie.

## Remuneration

We are remunerated by commission and other payments from product producers or lenders on the completion of your business. You may choose to pay in full for our services by means of a fee. Where we receive a recurring income, this forms part of the remuneration for ongoing advice regarding the business we advise you on and you will be provided with an annual benefit statement/value or review on your pension and investment business.

We will carry out a periodic assessment of the suitability of your investment only at your request. This assessment is not automatic because some clients do not wish to complete this assessment and we respect their decision.

If we receive commission from a product provider, this will be offset against the fee which we will charge you, except for mortgages. Where the commission is greater than the fee due, the commission will become the amount payable to us unless an arrangement to the contrary is made. Additional fees may be payable for complex cases or to reflect value, specialist skills or urgency. We will give you an estimate of this rate in advance of providing you with services and agree to it with you in writing.

We may charge an extra fee for some services; these fees will be agreed in advance of any advice given:

€300 for a full financial review,

€99 for a Savings and Investment review

€99 for a retirement planning consultation

We may receive up to 1% (or whatever maximum is applicable) of the loan for arranging mortgage finance. This commission is paid by the mortgage lender. The actual amount of commission will be disclosed at a later stage in the ESIS (European Standardised Information Sheet) which will be forwarded to you at the loan offer stage. A fee of €295 to €500 is charged for arranging your mortgage application. Please note that lenders may charge specific fees in certain circumstances and if this applies, these fees will be specified in your Loan Offer. You have the right to pay a fee separately and not include it in the loan. Typically, this situation arises in relation to specialist lending. A full list of lenders and remuneration is available on request.

If we provide mortgage advice and obtain a Loan Offer for you and you subsequently do not proceed with your mortgage application through ourselves, we will charge you an arrangement fee of €295 to €500 for our services.

If by investing in sustainable investment products there are any differences in charges etc., we will advise you of in advance of you agreeing to go ahead with your investment.

A summary of the details of all arrangements for any fee, commission, other reward or remuneration paid or provided to us by the product producers" is available on our website or in our offices. If you need help with this information, please do not hesitate to call us.

## Regular Reviews

It is in your best interests that you review, on a regular basis, the products which we have arranged for you. As your circumstances change, your needs will change. Please advise us of these changes and request a review of the relevant policy so that we can ensure that you are provided with up-to-date advice and products best suited to your needs.

## Default on Payments by Clients

We will exercise our legal right to receive payments due to us from clients (fees) for the services provided. Product producers may withdraw benefits or cover in the event of a default on payments due under policies or other products arranged for you. We would refer you to policy documents or product terms for the details of such provisions.

Mortgage lenders may seek early repayment of a loan and interest if you default on your repayments. Your home is at risk if you do not maintain your agreed repayments.

## Client Monies & Receipts

We request all cheques, or negotiable instruments are made payable to the appropriate Product Provider for Life, Pensions, Investment business and to lenders. We shall issue a receipt for each payment received. These receipts are issued with your protection in mind and should be stored safely. Every effort is made to ensure clients' money is transmitted to the appropriate Product Provider without delay. We are not authorised to accept cash.

The acceptance by us of a completed proposal DOES NOT in itself constitute the effect of a policy. It is only when the Provider or Lender confirms the policy is in place or the loan is drawn down that your policy is live.

### Data Protection

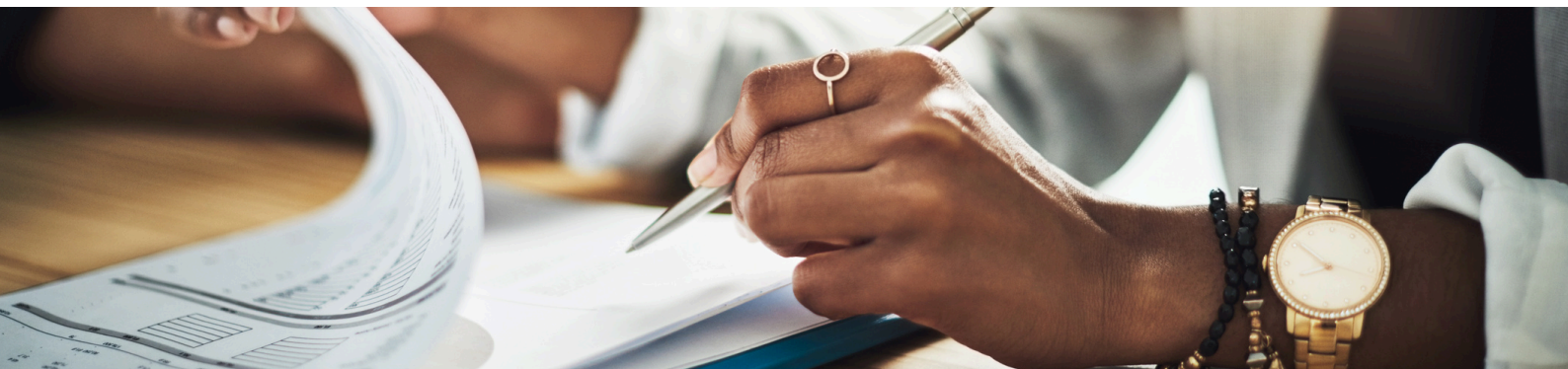
We comply with the requirements of the Data Protection Regulation. The data will be processed only in ways compatible with the purposes for which it was given. We will provide you with a separate Data Privacy Notice that will outline exactly how, what and where we use your data.

### Compensation Scheme

We are members of the Investor Compensation Scheme which provides for the establishment of a compensation scheme and the payment, in certain circumstances, of compensation to certain clients (known as eligible investors) of authorised investment firms, as defined in the Act. Compensation may be payable where money or investment instruments owned or belonging to clients and held, administered or managed by the firm, cannot be returned to those clients for the time being and where there is no reasonably foreseeable opportunity of the firm being able to do so. A right to compensation will arise only: If the client is an eligible investor as defined in the Act; and if it transpires the firm is not in a position to return client money or investment instruments owned or belonging to the clients of the firm; and to the extent the client's loss is recognized for the purposes of the Act. Where entitlement to compensation is established, the compensation payable will be less of 90% of the amount of the client's loss which is recognised for the purposes of the Investor Compensation Act, 1998; or Compensation of up to €20,000. For further information, contact Investor Compensation Co Ltd. on (01) 224 4955.

### Governing Law & Business Succession

These Terms of Business shall be governed by and construed in all respects according to the laws of the Republic of Ireland and will be deemed to cover any successors in business to True Financial Ltd.



# Customer Data Privacy Notice

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Life, Pensions, Investments and Mortgages. We provide our services from the selection of products provided by the Companies we have agencies with. In our professional opinion, we recommend the product best suited to you. To provide this service, we will need to obtain your personal information. The following outlines how we deal with this information and how it is used. Any questions or concerns you have can be addressed to us directly. This Privacy Notice sets out the basis on which we gather, use, process and disclose any Personal Data we collect about you or that you provide to us. This Privacy Notice applies to you, whether you are a current, past or prospective customer. It also applies to third parties whose data you provide to us in connection with our relationship with you (for example, the names of relatives). Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to us.

## Who controls your Personal Data, and how can you contact them?

We control your Personal Data to allow us to give you advice and recommendations on your financial affairs, your data is then passed on to the relevant company/companies we have agencies with by way of application forms, by post email or through their secure websites online.

## Data we may collect about You.

In order for us to give you a recommendation and information on financial products, we need to collect and process personal information about you. If you do not provide the information we need, we may be unable to offer you advice or provide our services. The types of personal data that are processed may include:

- Individual details - Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you.
- Financial detail – full details on any debts or loan assets you may own.
- Identification details - Identification numbers issued by government bodies or agencies, including your PPS Number, passport number, tax identification number

## Special Categories of Personal Data.

- Health information which has additional protection under the Data Protection Law. We do not process health information other than hold the information on the application forms you have filled in. The Life Insurers process and control your health data to allow them to underwrite your policy or decide to decline coverage; they may have further information they have obtained with your approval from your doctor, but we are not privy to this information.
- Claims information – information you give us with regards to claims you notify us about or ask for help on.
- Policy Information - Information about the quotes you receive and policies you take out.

## Where We May Collect Your Personal Data From.

We may collect your personal data from various sources, including:

- You
- Your employer or representative
- Life Companies we have agencies with
- When you sought a quote from us
- If you have or have any other contracts of insurance that are not under our agencies
- In this instance, we will need a letter of authorisation from you to allow us to contact other companies on your behalf
- When you visit our website, input a request for us to contact you.

Which of the above sources apply will depend on your particular circumstances and the product or service you are interested in or your enquiry relates to?

## Legal Bases for Processing Your Information.

We will only use your Personal Data for lawful reasons. These are:

- a) The use is necessary for the performance of a contract to which you are a party or to take steps at your request before entering a contract (such as providing a recommendation).
- b) The use is necessary to comply with our legal obligations.
- c) You have consented to us using your information in such a way.
- d) The use is necessary for the purpose of our legitimate interests.
- e) The use is necessary for the performance of a task carried out in the public interest, such as assisting a regulatory authority's investigation of a criminal offence

## The Purpose of Processing Your Information.

- To give you information on and provide you with recommended financial products.
- Disclose data to policyholder, life assured, beneficiary, trustee, assignee, successors, group company, or other parties.
- To comply with legal and regulatory requirements, including anti-money laundering and Sanction compliance.
- To understand how people, interact with our websites (if applicable).
- To carry out and determine the effectiveness of advertising and marketing campaigns.

### Who do we share Your Information with?

In order to provide our services and to comply with legal obligations imposed on us, we may share your information with:

- Pension Trustees, & beneficiaries of Pensions & other Financial Products, Relatives & guardians, (in certain circumstances and within the law)
- Employers - past, present and prospective.
- Legal, financial, investment, medical, & other professional advisors in the process of submitting your application on the various.
- Companies we may outsource our printing and posting to.
- Businesses that refer your business to us.
- Any business which we are required by law to share the information with, ie compliance resource companies.
- Database provider all data encrypted
- The Pensions Authority.
- Stockbrokers we have agencies with
- Insurance and Assurance companies we have agencies with Investment
- Companies we have agencies with An Garda Síochána.( Anti Money Laundering)
- Central Bank of Ireland. We are authorised by Central Bank and they have the right to inspect our files.
- The Financial Services Ombudsman. In the event of a complaint.
- Data Protection Commissioner
- The Revenue Commissioners. Re pensions and Dirt tax
- Lenders we have agencies with

### How long do we keep Your Information?

When providing products to you, it may be necessary to retain your information for an extended period of time. We keep your information for as long as required by law for the purpose that you gave it to us. As a general rule, for legal and best practice reasons, we are required to keep your information for 6 years after the date on which our relationship with you ends.

### Your Rights to Access, Transport, Correct, Delete and Restrict the Use of Your Personal Data.

You have the right to access a copy of your personal data, which we hold for you. In the case of Personal Data you provided to us to process on the basis of your consent or for automated processing, you have the right to have it provided in a commonly used electronic format to you or to another Data Controller (subject to applicable Data Protection Law). Please contact us if you would like a copy of your Personal Data. Your request will be dealt with as quickly as possible and, in any event, within a month for us to respond. If at that stage we are unable to provide the data you require (due to the complexity or number of requests) we may extend the period to provide the data by a further two months but shall explain the reason why. There is no charge for the request for your data, but it must be in writing, fax, email or text message.

### Correcting Your Personal Data.

You have the right to have your Personal Data corrected if you feel we have incorrect data held on you.

### Deleting Your Personal Data.

Subject to any overriding legal obligation requiring us to retain it, you have the right to have your Personal Data deleted, however erasing your information may make it difficult or impossible for us to give you information on, provide you with, or administer our financial products. If you want your information deleted, please contact us.

### Restricting our use of your Personal Data.

You have the right to restrict our use of your Personal Data in certain circumstances. If you wish to exercise your rights in this regard, please contact us.

### Automated/Profiling Decision Making.

Where we use automated decision-making, you will always be informed & you will be entitled to have a person review the decision so that you can contest it and put your point of view and circumstances forward. E.g. When we produce quotes for the business you are contacting us.



# GDPR



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