

Terms of Business

Terms of Business effective date 28 February 2024 until further notice.

These terms of business set out the basis on which SYS Mortgages DAC will provide business services to you as an individual private client of the firm and the respective duties and responsibilities of both the firm and you in relation to such services. Please ensure you have read through 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.

Authorisation with the Central Bank

SYS Mortgages DAC is regulated by the Central Bank of Ireland as a Mortgage Intermediary authorised under the Consumer Credit Act 1995 and as a Mortgage Credit Intermediary under the European Union (Consumer Mortgage Credit Agreements) Regulations 2016.

The firm is also authorised as an Investment Business Firm under Section 10 of the Investment Intermediaries Act 1995 and is registered as an Insurance Intermediary under the European Union (Insurance Distribution) Regulations, 2018. Copies of our regulatory authorisations are available on request.

The Central Bank of Ireland holds registers of regulated firms. You may contact the Central Bank of Ireland on 1890 777 777 or visit their website at www.centralbank.ie to verify our credentials.

Codes of Conduct

SYS Mortgages is subject to the Consumer Protection Code, Minimum Competency Code, Prudential Handbook for Authorised Advisors and Fitness & Probity Standards which offer protection to consumers. These codes can be found on the Central Bank's website www.centralbank.ie.

Our Services

Our principal business is to arrange mortgages through lenders we currently hold appointments with.

SYS Mortgages can provide advice on and arrange mortgage products from the following ranges: fixed-rate mortgages, variable rate mortgages, capital & interest mortgages, interest only mortgages and residential investment property loans. SYS Mortgages provides mortgage advice on a fair analysis basis (providing services on the basis of a sufficiently large number of contracts and product producers available on the market to enable the firm to make a recommendation, in accordance with professional criteria, regarding which contract would be adequate to meet your needs. We hold agencies with:

Dilosk Ltd T/A ICS Mortgages and Dilosk
Haven Mortgages Ltd
Permanent TSB Plc
Finance Ireland
MoCo
Seniors Money Mortgages DAC T/A Spry Finance
AvantCard DAC T/A Avant Money
Bank of Ireland PLC

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 upon our request.

Mortgage Protection is required for closing a Mortgage Loan. If you consent, our team of Financial Planners will contact you to arrange this.

We can also provide advice and arrange transactions on behalf of our clients in relation to life, pensions & investments products.

We are not under a contractual obligation to conduct insurance distribution business exclusively with one or more Insurance undertakings and do not give advice based on a fair and personal analysis, we do however provide advice from the selection of products provided by the companies we have agencies with.

We hold insurance agencies with:

Aviva Life & Pensions Ireland DAC
Irish Life Assurance Plc
New Ireland Assurance Plc
Royal London Insurance DAC
Standard Life International DAC
Zurich Life Assurance Plc

Sustainability Factors

Investment/IBIPs/Pension Advice

In accordance with the Sustainable Finance Disclosure Regulation ('SFDR'), we inform you that when providing advice on insurance-based investment products / Investments, we do not assess, in addition to relevant financial risks, relevant sustainability risks as far as this information is available in relation the products proposed/advised on.

This means that we do not assess environmental, social or governance events/conditions that, if they occur, could have a material negative impact on the value of the investment.

When providing advice on insurance-based investment products ('IBIPs') or investment advice we do not consider the impacts of our advice that result in negative effects on sustainability factors (namely environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters), because currently, there is limited relevant products on the market which meet these criteria.

The area of sustainable is relatively new and as the issue progresses, we will review our position.

We have not assessed the likely impacts of sustainability risks on the returns of *Investment/Pensions* since we have not been able to identify any sustainability risks that are relevant.

We will review this approach on an annual basis in February.

Advisory Fee - Mortgage

SYS Mortgages may charge you a fee for services provided. SYS Mortgages may receive commission and other payments from financial institutions to which we transmit orders on your behalf.

The following fees are applicable at mortgage application stage -

- €200
- €750 when the applicant is non-resident

This fee is non-refundable. This fee is not in any way an indication of mortgage/loan approval

Remuneration

Our firm is remunerated by commission and other payments from product providers and lenders on the completion of business.

If you decide to change lender before your fixed term has ended, then any commission fee paid to us by the lender will be clawed back. If you have a desire to change lenders, please let us know in advance so we can support this change.

Details of this remunerations are available on request and on our website <http://www.sysgroup.ie/mortgages> We may receive up to 1% of the loan drawdown 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.

Conflicts of Interest

It is the policy of SYS Mortgages to endeavour to avoid, as far as possible, any conflict of interest when providing services to its clients. However, where an unavoidable conflict may arise we will advise you of this in writing before proceeding to provide any service.

If you have not been advised on any such conflict you are entitled to assume that none arises.

Default on Payments

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.

Complaints

You can make a verbal or written complaint to us, which is covered by these Terms of Business, provided by SYS Mortgages to you. Such complaints can be referred to The Compliance Officer, SYS Mortgages, 21 Quintin's Way, Pearse Street, Nenagh, Co Tipperary or to info@sysmortgages.ie.

The Compliance Officer will be your contact point in relation to the ongoing investigation of your complaint.

We will also inform you of your right to refer the matter to the Financial Services & Pensions Ombudsman, as the case may be.

Our full complaints procedure can be sent to you on request.

Confidentiality & Data Protection

SYS Mortgages is subject to the requirements of the General Data Protection Regulation 2016 and the Irish Data Protection Act 2018.

We are committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a client.

The data which you provide to us will be held on a computer database and paper files for the purpose of arranging transactions on your behalf.

The data will be processed only in ways compatible with the purposes for which it was given and as outlined in our Data Privacy Notice.

This will be given to all our clients at the time of data collection. We will ensure that this Privacy Notice is easily accessible. Please refer to our website <http://www.sysgroup.ie/mortgages> for further information.

Marketing Consent

We would also like to keep you informed of any insurance, investment and any other services provided by us or partner companies of SYS Mortgages, which we think may be of interest to you. We would like to contact you by way of letter, email or telephone call. If you do not wish to receive such market information, please tick the box on the Terms of Business & GDPR declaration section on our consents form. Please contact us by email at info@sysmortgages.ie if you have any concerns about your personal data.

Credit Logic

SYS Mortgages uses the platform CreditLogic to process Mortgage applications and store client data. As part of the process, you will be invited to set up a login to CreditLogic so you can securely provide information and documentation. CreditLogic is a product provider to SYS Mortgages DAC and is a deemed Data Processor.

Receipts

SYS Mortgages DAC shall issue a receipt from each non-negotiable or negotiable instrument of payment received.

This is required pursuant to Section 30 of the "Investment Intermediaries Act, 1995 or as applicable Provision 3.5 of the Consumer Protection Code 2012.

Receipts are issued with your protection in mind and should be stored safely.

Investor Compensation Scheme

We are members of the Investor Compensation Scheme. The Investor Compensation Act, 1998 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 that Act.

Compensation may be payable where money or investment instruments owed 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: (a) If the client is an eligible investor as defined in the Act; and (b) If it transpires that the firm is not in a position to return client money or investment instruments owned or belonging to the clients of the firm; and (c) To the extent that the client's loss is recognised for the purposes of the Act.

Where an entitlement to compensation is established, the compensation payable will be the lesser 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 the Investor Compensation Company Ltd on (01) 224 4955.

Brokers Ireland Compensation Fund

We are also members of the Brokers Ireland Compensation Fund. Subject to the rules of the scheme the liabilities of its members firm up to a maximum of

€100,00 per client (or €250,000 in aggregate) may be discharged by the fund on its behalf if the member firm is unable to do so, where the above detailed Investor Compensation Scheme has failed to adequately compensate any client of the member.

Further details are available on request.

Governing Law and 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 SYS Mortgages DAC.

SYS Mortgages DAC is regulated by the Central Bank of Ireland. Reg No. 131489.

CEO: Tony Delaney

Registered Office: Unit 21 Quintin's Way,
Pearse Street, Nenagh Co Tipperary

Tel: 061 511135

Email: info@sysmortgages.ie

Website: www.sysmortgages.ie

SYS Mortgages DAC is part of SYS Group Ltd.



CUSTOMER PRIVACY NOTICE

Privacy notice effective date November 2021 until further notice.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation mortgages. We provide our services from the selection of products available by the providers we have agencies with. We recommend the product that, in our professional opinion, is best suited to you. In providing this service to you we will need to obtain personal information from you 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 bases 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 to our relationship with you and 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 not be able to offer you advice or provide our services to you. 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, loans assets you may own.
- Identification details - Identification numbers issued by government bodies or agencies, including your PPS Number, passport number, tax identification number.

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, any other records you have or had any other contracts of insurance with or sought a quote from a us on that is under our agencies, otherwise we will need a letter of authorisation from you to allow us contact other companies on your behalf. When you visit our website and 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: -

- The use is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract (such as providing a recommendation).
- The use is necessary to comply with our legal obligations.
- You have consented to us using your information in such a way.
- The use is necessary for the purpose of our legitimate interests.
- 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

1. To give you information on and provide you with recommended mortgage products.
2. Disclose data to mortgage providers.

3. To comply with legal and regulatory requirements including Anti-Money Laundering and Sanctions compliance.
4. To understand how people interact with our websites (if applicable).
5. To carry out and determine the effectiveness of advertising, and of marketing campaigns.

Who 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: -

1. Mortgage providers to whom we submit your lending application.
2. Employers – past, present and prospective.
3. Companies we may outsource our printing and posting to.
4. Businesses that refer your business to us.
5. Any business which we are required by law to share the information with, i.e. compliance resource companies.
6. Database provider all data encrypted
7. An Garda Síochána.(Anti Money Laundering)
8. Central Bank of Ireland. We are authorised by Central Bank and they have the right to inspect our files.
9. The Financial Services Ombudsman. In the event of a complaint.
10. Data Protection Commissioner
11. The Revenue Commissioners.

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 for. As a general rule for legal and best practice reasons we are required to keep your information for 7 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 on 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). If you would like a copy of your Personal Data, please contact us. 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.

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