

## **CUSTOMER PRIVACY NOTICE**

Our principal business is to provide an administration service to Intermediaries who we have appointed relation to Life, Pensions, and Mortgages. In providing this service we will need to obtain personal information from you on your clients 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 your clients, or that you provide to us.

This Privacy Notice applies to your clients, whether you are a current, past or prospective customer. It also applies to third parties who's 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 Clients Personal Data and how can you contact them**

We process your clients Personal Data to allow us to give you the service we have agreed on as part of your appointment this is then passed on to the relevant companies/lenders we have agencies with by way of application forms, by post email or through their secure websites online.

### **Data we may collect about Your Clients**

In order for us to process your clients information on your behalf and information on financial products, we need to collect and process personal information about them. If you do not provide the information we need, we may not be able to offer you 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, loans assets you may own.
- Identification details - Identification numbers issued by government bodies or agencies, including your PPS Number, passport number.

### **Special Categories of Personal Data**

- Health information which has additional protection under Data Protection Law. We do not process health information other than hold the information on application forms the client has filled in. The Life Insurers process and control your client's health data to allow them to underwrite your clients policy or decide decline cover, they may have further information they have obtained with your clients approval from your doctor but we are not privy to this information.

- **Claims information** – information you give us with regards claims you notify us about or ask for help on.
- **Policy Information** - Information about the quotes you receive and policies your clients take out.

### **Where We May Collect Your Clients Personal Data From**

We may collect your clients personal data from various sources, including; You, Your employer or representative, Life Companies we have agencies with, any other records your clients have or had any other contracts of insurance with or sought a quote from on that is under our agencies. Which of the above sources apply will depend on your clients particular circumstances and the product or service your clients are taking out.

### **Legal Bases for Processing Your Clients Information.**

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

- a) The use is necessary for the performance of a contract to which they are a party or in order to take steps at their request prior to entering a contract
- (b) The use is necessary to comply with our legal obligations.
- c) Your clients 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 Clients Information**

- To give you the service we have agreed to perform for you.
- Disclose data to policyholder, life assured, beneficiary, trustee, assignee, successors, group company or to other parties.
- To comply with legal and regulatory requirements including Anti-Money Laundering and Sanctions compliance.

### **Who we share Your Clients Information with**

In order to provide our services and to comply with legal obligations imposed on us, we may share your clients 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.
Lenders
The Financial Services Ombudsman. In the event of a complaint.
Data Protection Commissioner
The Revenue Commissioners. Re pensions and Dirt tax

### **How long do we keep Your Clients Information**

When providing our service to you it may be necessary to retain your clients information for an extended period of time. We keep their 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 clients information for 6 years after the date on which the our relationship with you ends.

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

You have the right to access a copy of your clients Personal Data which we hold on them. In the case of Personal Data your clients provided to us to process on the basis of their consent or for automated processing, they have the right to have it provided in a commonly used electronic format to them or to another Data Controller (subject to applicable Data Protection Law). If your clients 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 Clients Personal Data**

Your clients have the right to have your Personal Data corrected if they feel we have incorrect data held on them.

### **Deleting Your Clients Personal Data**

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

### **Restricting our use of your Clients Personal Data**

Your clients have the right to restrict our use of your Personal Data in certain circumstances. If they wish to exercise their rights in this regard please contact us.

Where we use automated decision-making you will always be informed & you will be entitled to have a person review the decision so that your clients can contest it and put their point of view and circumstances forward.

### **Your Clients Right to Object and Withdraw your Consent to Data Processing**

Where our lawful basis for processing your clients Personal Data is based on our legitimate interests, they have the right to object. Your clients also have the right to withdraw their consent to any processing at any time. However if we cannot process your clients data it may make it difficult, impossible or unlawful for us to give you information on, provide you with, our service. If your client wants to object or withdraw their Consent to processing please contact us.

### **Your Clients Right to Make a Complaint**

If your clients are dissatisfied about the way we handle their Personal Data please contact us. We will do our best to address their concerns swiftly and resolve any issues they have. Your clients have the right to complain to the Office of The Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23. [www.dataprotection.ie](http://www.dataprotection.ie) Tel.: +353 (0)761 104 800. Fax: +353 57 868 4757. E-Mail: [info@dataprotection.ie](mailto:info@dataprotection.ie)

### **Automated/Profiling Decision Making**