



CUSTOMER PRIVACY NOTICE

Privacy notice effective date October 2020 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:

1. 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.
2. Financial details – full details on any debts, loans assets you may own.
3. Identification details – Identification numbers issued by government bodies or agencies, including your PPS Number, passport number, tax identification number

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Where We May Collect Your Personal Data From

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

You, Your employer or your representative. 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:

1. 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).
2. The use is necessary to comply with our legal obligations.
3. You have consented to us using your information in such a way.
4. The use is necessary for the purpose of our legitimate interests.
5. 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.

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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 the 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.