

Privacy Notice

Introduction

Finance First, The Advice Centre is 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.

It is the intention of this privacy statement to explain to you the information practices of Finance First, The Advice Centre in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Finance First, The Advice Centre, Address: Unit 7 The Courtyard, Fonthill Business Park, Clondalkin, Dublin 22. Tel: 01-626 9708. Email: info@finance-first.ie
- When we refer to 'we' it is Finance First, The Advice Centre

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

Who are we?

- **Finance First, The Advice Centre** offer advice in relation to all aspects of mortgage finance and also in relation to life assurance products (Term Cover, Serious Illness and Permanent Health Insurance) and pension products. Leo Healy trading as Finance First, The Advice Centre is a member of Brokers Ireland. We transmit orders on client's behalf to any of the product producers from whom the company hold letters of appointment.

Our GDPR Owner and data protection representatives can be contacted directly here:

- Leo Healy
- Email address: info@finance-first.ie
- Phone number: 01-626 9708

Purpose for processing your data/Types of data

The Personal Information we may collect about you will depend on the type of Service we are providing and the relationship between us. This data may include:

- Name and contact information;
- Demographic information (such as gender, age, date of birth, marital status, nationality, education/work information, academic/professional qualifications, employment details, hobbies, family composition, and dependents);
- Personal identification documentation and related information such as passport numbers and employee identification numbers;
- Financial and payment data such as bank account numbers and transaction information;
- Information related to the provision of the Services, such as policy information, claims information, and information relating to incidents giving rise to claims and related losses;

- Information about your property and assets;
- Statements made by our about you;
- Records of communications; and
- Human resources data, such as job title and role; benefits and compensation information; educational, academic and professional qualifications information; emergency contact information; and performance management information.

Some of the categories of information that we collect are special categories of Personal Information (“Sensitive Personal Information”). These include your medical information and criminal records, fines and other like judicial records.

How we may use your personal information:

- to provide the services and fulfill our contractual obligations to you and for legitimate business interests
- to operate and expand our business activities
- to perform administrative activities in connection with our services
- to exercise, defend or protect our legal rights or the rights of our clients or third parties
- to comply with legal and professional obligations and to cooperate with regulatory bodies
- claims handling
- sharing details or seeking personal information from Insurers (if applicable) and anyone authorized by you to act on your behalf
- sharing details with or seeking personal information from loss adjusters, repairers and other claims handling agents, medical practitioners, engineers and legal practitioners
- to process any payments whether in relation to your policy or a claim
- to manage and investigate any complaints
- to make back-ups of your data in case of an emergency and for disaster recovery purposes
- We may keep a written record of verbal conversation, for regulatory, training and quality purposes

Why we are processing your data? Our legal basis.

In order for us to provide you with advice and to transmit orders on your behalf to the companies which we hold agency appointments with, Finance First, The Advice Centre need to collect personal data for all aspects of mortgage finance and/or Life Assurance Products (Term cover, Serious illness cover and Permanent Health Insurance) as well as pension products. Our reason (lawful reason) for processing your data under the GDPR is:

Legal basis - Finance First, The Advice Centre needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract. This is necessary for Term Cover, Mortgage Finance and Pension products to allow the relevant product providers assess your proposal.

In most cases the **legal basis** will be one of the following:

- To provide services to you under a contractual obligation

- For our legitimate interests, for example to provide Services to you, to ensure that the Services we provide are appropriate for your requirements, to improve our Services, manage our risks, maintain accurate transaction records, and manage our business in an efficient way;
- For the legitimate interest of our clients and other third parties (for example, to assist with processing of claims made against policies held or underwritten by them and to prevent and detect suspicions of fraud); or
- To comply with our legal obligations such as due diligence and reporting obligations

We process Sensitive Personal Information on the following legal basis:

- With your consent, where consent is required by law. You may withdraw your consent at any time by contacting us using the details at the end of this privacy notice;
- To establish, exercise or defend legal claims; or
- Where legislation otherwise permits and requires us to process Sensitive Personal Information (for example, where the processing is necessary for insurance purposes).

Finance First, The Advice Centre will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. We are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

How will Finance First, The Advice Centre use the personal data it collects about me?

Finance First, The Advice Centre will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

Special Categories of personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data) – we will ensure the below

- we will obtain your explicit consent

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Finance First, The Advice Centre in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Finance First, The Advice Centre procedures.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

We may share your personal data with third parties:

- Any Finance First, The Advice Centre's associated Company for the use and purposes as set out above
- External parties in order to administer your policy (example, other insurance companies and intermediaries)
- Anyone authorized to act on your behalf
- Third party service providers such as technology suppliers, hosting/storage providers, payment providers and document providers
- As a result of our legal and regulatory obligations, this can include with An Garda Siochana, other official agencies and on foot of a court order or subpoena
- Loss adjusters, claims investigators, repairers, medical practitioners, solicitors, and other firms as part of the claims handling process
- With perspective sellers or buyers in the event that we decide to sell or buy any business or assets

Where we obtain data from these sources, the categories we obtain will be personal data or claims information, relating to the services provided.

We may also need your consent for the processing of certain data and in these cases, we will inform you of such processing the reason for this at the time consent is captured.

The third parties that we pass your personal data to include, but are not limited to:

- Irish Life
- New Ireland Assurance
- Zurich Life
- Aviva Life & Pensions
- Friends First
- Royal London
- April Insurety Ireland
- Blue Insurance
- AIG Rapid Cover
- Affinity Mortgage Advisors
- Wealth Options
- Brokers Ireland Network Services

If we transfer personal data to a third party or outside the EU we as the data controller will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available.

Data Subjects Rights:

Finance First, The Advice Centre facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data.

Additional information we are providing you with to ensure we are transparent and fair with our processing

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Finance First, The Advice Centre will process personal data in accordance with our retention schedule. This retention schedule is governed by our regulatory body and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Finance First, The Advice Centre or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority; Office of the Data Protection Commissioner and with Finance First, The Advice Centre's GDPR Owner.

Complaints to Finance First, The Advice Centre's GDPR Owner:

You may lodge a complaint to our GDPR Owner Leo Healy via email to info@finance-first.ie

You may also lodge a complaint in writing. This can be posted to the following address:

Leo Healy GDPR Owner,
Unit 7 The Courtyard,
Fonthill Business Park,
Clondalkin,
Dublin 22.
Eircode: D22 XA07

Complaints received by telephone will not be accepted and will need to be in writing.

Complaints to the Supervisory Authority:

You may lodge a complaint to the Supervisory Authority at the following address:

Office of The Data Protection Commissioner,

Canal House,

Station Road,

Portarlinton,

Co. Laois.

Eircode: R32 AP23.

Website: www.dataprotection.ie

Failure to provide further information

If we are collecting your data for a contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

Profiling – automatic decision making

Profiling;

We may use some aspects of profiling. The main categories are

- a) Risk profiling.
- b) Profiling for marketing purposes.
- c) Establishing affordability and providing quotations for financial services and mortgage products

a) Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customers attitude to various levels of risk having answered a series of questions. This is an indicative system-based decision tool provided by the insurance companies we deal with. By proceeding with the proposed product or fund, you enter a risk of funds increasing or decreasing.

b) Profiling for marketing purposes.

When we seek to contact you about other services, as outlined above, we may run automated queries on our computerised database to establish the suitability of proposed products or services to your needs. This is to allow us to contact you with products we feel are relevant to you and your needs

c) Establishing affordability and providing quotations for financial services products.

This allows us to give an informed recommendation based on your financial circumstances.

You may object to any or all aspects of profiling if you wish.

Additional Processing

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 01-626 9708 or email info@finance-first.ie

Privacy policy statement changes

Finance First, The Advice Centre may change this privacy policy from time to time. When such changes are made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services you agree to this privacy policy.

This privacy policy was last reviewed in May 2018