

Data Protection Privacy Notice: General Data Protection Regulation (GDPR)

John Greene t/a Leinster Financial Services, 131 Elton Court, Leixlip, Co. Kildare.

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Introduction

John Greene t/a Leinster Financial Services is committed to protecting and respecting your privacy. I wish to be transparent on how I process your data and show you that I am accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a customer.

It is the intention of this privacy statement to explain to you the information practices of John Greene t/a Leinster Financial Services in relation to the information I collect about you.

For the purposes of the GDPR the data controller is:

- John Greene t/a Leinster Financial Services
- Contact details: 131 Elton Court, Leixlip, Co.Kildare. Ph: 0 1624 7890 / Mob. 087 270 8568 / Email: info@leinsterfinancial.ie / Web: www.leinsterfinancial.ie
- When we refer to 'the firm' it is John Greene t/a Leinster Financial Services

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

Who am I?

- John Greene t/a Leinster Financial Services is regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations, 2018. The Central Bank of Ireland holds registers of regulated firms. You may contact the Central Bank of Ireland on 1890 777 777 or alternatively visit their website on www.centralbank.ie to verify my credentials. The firm is also subject to the Consumer Protection Code, Minimum Competency code and Fitness & Probity Standards issued by the Central Bank of Ireland, with which the firm must comply. These Codes and Standards can be found on the Central Bank of Ireland website www.centralbank.ie
- The services offered by the firm are: Financial Planning & Advice; Life Insurance Product Reviews; Life Assurance, Specified Serious Illness Insurance, Income Protection Insurance; Protection Insurance Options such as hospital cash cover, etc.; Pensions / Retirement Plans; Retirement Benefit Plans and Options; PRSA Insurance Policies; Insurance Based Investment Products (IBIPs).

The GDPR Owner and data protection representative can be contacted directly here:

- John Greene - 01 624 7890 / john@leinsterfinancial.ie or by post to the address detailed at the top of this document.

Purpose for processing your data and how it is processed:

Website:

- Cookies – the firm's website uses "cookie" technology. A cookie is a little piece of text stored by the browser on your computer, at the request of our server. Cookies may be used to deliver content specific to your interests and to save your personal preferences so you do not have to re-enter them each time you connect to the website – the firm's cookies are not available to other websites. Cookies will record the following: your IP gateway address, the point of entry to the site, search terms used, your navigation through the site and other information that helps make the site more accessible. You are always free to decline cookies, if your browser permits, or to ask your browser to indicate when a cookie is being sent. You can also delete cookie files from your computer at your discretion. Note that if you decline cookies or ask for notification each time a cookie is being sent, this may affect your ease of use of the website.
- Data is collected from you through the firm's website, if you voluntarily submit it. This is data that identifies you or can be used to identify or contact you and may include your name, address, email address, user IP addresses in circumstances where they have not been deleted, clipped or anonymised, telephone number, date of birth, reason for contacting us, product interest, occupation, etc. This data is used to provide information and services to you from the firm or to contact you in relation to your enquiry.

Other:

- Data requested by the firm for financial planning advice is required by legislation and deemed necessary for full and accurate advice and will be used for that purpose. This may also be used for product advice and for processing product applications where applicable. Data requested for processing product applications is required by legislation and/or deemed necessary for provision of the product/contract. In particular information regarding personal details, Tax/Revenue details, lifestyle habits and health history may be required.
- In order for the firm to provide you with financial planning and advice we may require personal data such as name, date of birth, dependants and their age, including minor children, relationship status, employment status, general health statement, known changes to future circumstances, life plans, knowledge and/or experience of financial products, income, outgoings, savings, financial products held, other assets, debts, other financial commitments; attitude to investment risk and other personal data deemed necessary.
- For processing applications for life assurance, other protection product insurance policies, pension insurance policies and Insurance Based Investment Products (IBIPs), the data required may be; name, any other/previous name, date of birth, address, relationship status, product/contract beneficiary, insurable interest, contact details, country of birth, nationality, residency status for tax, occupation, income, tax/revenue details, lifestyle habits, health history, other products held, other relevant benefits due or redeemed, photo and address ID, bank account details and any other data deemed necessary.
- Your data may also be used for producing automated results in relation to financial advice. This is known as profiling. Profiling is used by the firm for producing quotation comparisons, product comparisons, investment risk analysis and client specific quotations.
- Your data may also be used for marketing our services. Profiling for marketing may be used in relation to product, age, occupation or other data that may be suitable. You will be asked for consent in relation to marketing and profiling for marketing. Your consent can be withdrawn at any time.
- Your data will be processed in person and/or by phone and/or by electronic means.
- Your data will be held by the firm for 6 years after the cessation of services to you and/or after the completion of a product/contract of insurance arranged for you by the firm, in order for the firm to show compliance with laws applicable to financial services, laws laid down by regulatory authorities, to support complaints, to support claims. It may be necessary to hold data longer than stated, in cases of ongoing lawful enquiries, in cases of insurance claims or other circumstances that may occur.
- For Suppliers and Service Providers – the collection of your data is for the purpose of placing orders, confirming supply & receipt of goods/services, for paying invoices, for follow up service, for following up issues with supply/service. The data will be held for up to 6 years after the cessation of our business arrangement in order for the firm to support complaints about supply/services; to support expenses claimed for tax relief. It may be necessary to hold data longer than stated, in cases of ongoing lawful enquiries, in cases of insurance claims or other circumstances that may occur.
- The risks to your data are; the accidental or unlawful, destruction; loss; alteration; unauthorised disclosure of; access to, personal data transmitted, stored or otherwise processed. The firm has measures in place to mitigate these risks.

Legal Basis.

The firm will request data from its customers that is deemed necessary for the service/s being provided by it. The services provided and an outline of data that may be processed are detailed above.

The firm is committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

Legal Basis for Processing Personal Data (including Criminal History data) (Art 6(1) GDPR & S.49 DP Bill)

- Contract – Data used for; processing insurance policy/contract applications and for the performance of the insurance policy/contract is deemed necessary.

- Legal Obligation – Data used for financial planning advice and for product advice is required by law under the Consumer Protection Code as laid down by the Central Bank of Ireland. Data retention is required under the Consumer Protection Code and to comply with requests from the Financial Services and Pensions Ombudsman. Identification documents and money laundering risk assessment are required under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 and amendments.
- Consent – Your consent will be sought for processing data in relation to; marketing and profiling for marketing.
- For Service Providers and Suppliers – Data used for; setting up a contract, for placing orders, for paying invoices, for follow up and complaints and for the general performance of the contract is deemed necessary.
- In the case of Criminal History/ongoing criminal proceedings only: Risk Assessment or Fraud Prevention.

Legal Basis for Processing – Sensitive/Special Category Data (eg Health data):- (Art 7 GDPR & S.39 - 44 DP Bill)

- Insurance and Pension purposes – Necessary and proportionate for the purposes of providing an insurance product, including pensions and investment insurance policies.
- Legal Advice and Legal Proceedings – Necessary for obtaining legal advice whether or not in the context of a claim (or prospective claim).

How will the firm store and use the personal data it collects about me?

- The firm will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). The firm will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.
- The data collected by the firm will be held on the firm's computer database and/or paper files and/or other durable medium which will be kept on the firm's premises or other secure premises. The data collected by the firm for processing products/transactions will also be held by the relevant product producer who has secure data storage in compliance with GDPR. Data collected by the firm may be held by our client management service provider who has secure data storage in compliance with GDPR.
- The firm will use safe storage policies such as; password protection, data back-up, secure storage, firewall and virus protection, confidential document shredding, etc.
- When using your data the firm employs safe usage principals such as; locked computer screens, secure storage of documents, firewall and virus protection and good practice principals to keep your data private and secure.
- Data collected through the firm's website is held on secure servers hosted by the firm's Internet Service Provider. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data.

Who is the firm sharing your data with?

- Your data will be shared with insurance companies for the purpose of; processing and providing insurance policies/contracts, for producing quotations using automated results based on your data (profiling), for providing investment risk results based on your data collected on a questionnaire (profiling). Your data will be shared with our service providers for the purpose of; client management, financial planning research (profiling), product research (profiling), quotation research (profiling) and other purposes in line with our services to you. We may be required to share your data with regulatory authorities and other entities for legal purposes. Any third parties that we share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide. When they no longer need your data to fulfil this service, they will dispose of the details in line with GDPR procedures.
- Data collected through the firm's website is held on secure servers hosted by the firm's Internet Service Provider. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data.

- Third parties may share your data with their service providers, regulatory authorities and other entities for legal purposes. Insurance companies may also share your data with medical professionals in line with the product/service being provided.
- Insurance companies may transfer your data outside the EU. The insurance companies will inform you if this is the case and will provide information regarding data transfer outside the EU in line with the requirements of GDPR
- For Service Providers and Suppliers - Your data may be shared with our other service providers and suppliers for the purpose of; business management, business accounts, revenue returns, service issues, etc. We may be required to share your data with regulatory authorities and other entities for legal purposes. Third parties may share your data with their service providers, regulatory authorities and other entities for legal purposes.

Data Subject Rights:

John Greene t/a Leinster Financial Services facilitates your rights in line with my data protection policy and the subject access request procedure. This is available on request.

At any point while the firm is 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. Where data is required for the performance of a contract or other legal reasons, then it cannot be erased.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing. This will mainly relate to marketing.
- **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 have the right to object to profiling.
- **Right to judicial review:** in the event that your request under rights of access is refused, you will be provided with a reason as to why.

Additional information:

Failure to provide information:

If you do not provide personal information that is deemed necessary the firm will not be able to:

- assess suitability and where relevant provide you with a recommendation for a financial product or service
- provide the requested products or services to you
- continue to provide and/or renew existing products or services

and/or

- the product or service may be void

Additional Processing

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

Contact

Please contact the firm with any queries in relation to its data protection policies and procedures or to exercise any of your data rights – Contact: John Greene / 01 624 7890 / john@leinsterfinancial.ie / www.leinsterfinancial.ie

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by the firm or how your complaint has been handled, you have the right to lodge a complaint with the data owner, John Greene t/a Leinster Financial Services, 131 Elton Court, Leixlip, Co. Kildare, John Greene / 01 624 7890 / john@leinsterfinancial.ie / www.leinsterfinancial.ie or directly with the supervisory authority, Contact the Office of the Data Protection Commission at: Data Protection Commission, Canal House, Station Road Portarlinton, R32 AP23, Co. Laois. Telephone +353 (0)761 104 800 / Lo Call Number 1890 252 231 / Fax +353 57 868 4757 / E-mail info@dataprotection.ie

Privacy Notice changes

John Greene t/a Leinster Financial Services may change this privacy notice from time to time. When such a change is made, the firm 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 notice periodically so that you are aware of any changes. By using the firm's services you agree to this privacy notice.