

Privacy Policy – Finance One Ltd

Introduction

Finance One Ltd 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 One Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Finance One Ltd
- Contact details of Clifton Mews, Fitzwilliam Street Lower, Dublin 2. Tel 01-6471200
- When we refer to 'we' it is Finance One Ltd

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 One aim to help you to achieve and enhance your financial objectives. For over 21 years, our clients have received quality service with a wealth of experience.

At Finance one we are all about you, the client. As an impartial financial intermediary we constantly strive to ensure that we have the best possible range of products and advice for your needs.

We have a proven track record in building long term relationships with our clients with the aim to help you to look after your financial objectives by providing you with unbiased knowledge and the best products.

Our range of services include

- Investments
- Retirement planning, pensions
- Financial planning/Restructuring
- Mortgage lending/Cash Management

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Name : Una Scollard
- Email address : una@financeone.ie
- Phone number : 01-6471200

Purpose for processing your data

- To respond to your request (s) for advice or products or queries in relation to same.
- To review your financial, insurance or mortgage position or products as is prudent or required.
- To recommend products that protect your lifestyle e.g. protecting your family (including mortgage) in the event of your death.
- To plan your financial future e.g. retirement funds, savings and investment options.

Why we are processing your data? Our legal basis.

In order for us to provide you with financial services, Finance One Ltd need to collect personal data for implementation of various financial products and services. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – Finance One Ltd 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. (Protection Policy, mortgage, investments, pensions or any other suitable financial product or service).

In any event, Finance One Ltd 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 One use the personal data it collects about me?

Finance One 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 from you (Finance One consent form must be signed)

Who are we sharing your data with?

All the personal data we process is processed by our staff in Ireland, however for the purposes of IT hosting and maintenance this information is located on servers within the European Union. No third parties have access to your personal data unless the law allows them to do so. (by consent only).

We may pass your personal data on to third-party service providers contracted to Finance One 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 One 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.

The third parties that we pass your personal data to are:

New Ireland	Permanent TSB
Zurich	KBC Bank
Aviva	Ulster Bank
Irish Life	Bank of Ireland
Royal London	Haven Mortgages
Standard Life	Pepper Home Loans
Cantor Fitzgerald	ICS
Phoenix Ireland	Investec
Friends First	Quilter Cheviot
BCP	Smith Williamson
Blackbee	Davy Select
Greenman	New Court Trustees
Quest Capital Trustees	Merrion Capital Group
The Vernier Group	Independent Trustee Group

We have issued all our third party processors with a Data Processor checklist asking them GDPR specific questions

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 One 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 One will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body Central Bank of Ireland 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 One or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority the Data Commissioner's office, email dpcbreaches@dataprotection.ie or contact Finance One's data protection representatives Una Scollard, 01-6471202 or email una@Financeone.ie.

Failure to provide further information

If we are collecting your data for a contract (e.g. Life policy, mortgage pension, deposit or investment) 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;

Financial and mortgage advisors use profiling in their business. The main categories are

(a) Risk profiling. To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customer's attitude to various levels of risk having answered a series of questions

(b) Profiling for marketing purposes. When we seek to contact you about other services, as outlined above we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

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

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 01-6471200 or email Una@financeone.ie

Privacy policy statement changes

Finance One may change this privacy policy from time to time. When such a change is 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
