

## **Privacy Notice– PFP Financial Services Limited**

### **INTRODUCTION**

PFP Financial Services Limited (“PFP”) are 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 PFP in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Paddy Mahony (Managing Director)
- [paddymahony@pfp.ie](mailto:paddymahony@pfp.ie) or 01 4980007
- When we refer to ‘we’ it is PFP Financial Services

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?**

PFP Financial Services Limited offer excellent value and service to clients to assist in meeting their financial planning needs. We believe that Financial Planning starts with discovering what's important to you in life and what goals you have for the future. Whatever ambitions and plans you have, our proven 'Lifestyle Financial Planning' services are helping people to better manage their day-to-day finances, to grow and protect their wealth.

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

- Paddy Mahony
- [paddymahony@pfp.ie](mailto:paddymahony@pfp.ie)
- 01 4980007

### **WHAT IS A DATA PRIVACY NOTICE & WHY IS IT IMPORTANT?**

We know your personal information is important to you and it is important to PFP too. This Data Privacy Notice tells you what we use your personal information for and explains your rights around how we use it. Please read this Data Privacy Notice to understand how and why we use your personal information.

If you give us personal information about someone else, please make sure you have their permission and make them aware of this Data Privacy Notice.

### **WHAT INFORMATION WE COLLECT AND WHY (OUR LEGAL BASES FOR PROCESSING)**

We use personal information, including special categories of personal data and other sensitive personal data (e.g. earnings, assets/ liabilities, health details) to advise you about products and services we offer and to administer these policies should you decide to go ahead with

purchasing a policy through PFP. We must have a lawful basis to collect and use personal information. These legal bases are explained below:

**Necessary for the performance of a contract:**

We need to collect and use your personal information to arrange for your policy contract through the relevant insurer who underwrites any policy you choose to go ahead with. The information collected includes, but is not limited to, your name, date of birth and contact details. Depending on the policy type this can include health, employment, pension and salary information. We restrict access to, and the use of, special categories of data and other sensitive personal information.

The personal information needed for policy contracts is held and used to:

- verify your identity and to verify the accuracy of the information we receive about you
- assess the information you have provided and make a decision as to whether we can provide you with cover through the relevant insurer
- provide you with a quotation for a product and to arrange for the provision of specific product cover should you decide to purchase a product through PFP
- share your personal information with the relevant provider to ensure that you have the appropriate cover in place
- provide you with information about your policy
- provide ongoing client service
  - to administer your policy and make any changes during its term, answer queries, provide updates or process a cancellation, contact you to inform you of any relevant actions you may need to take
  - store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes
  - assist you in the making of a claim through the relevant insurer

**Required by law: Below is how we use your personal information to comply with all relevant laws and regulations:**

- For the provision of financial advice, you must give personal and financial information for your current and future needs to be assessed. This allows us to recommend the most suitable financial product for you. This also involves creating new personal information about you. We are required to complete this analysis of you, using your personal information, in order to comply with regulations applicable to PFP:
  - Reporting to regulators.
  - Keeping proper books and records.

- To manage and investigate any complaints.
  - We carry out internal reporting, quality checking and compliance controls to help meet our legal obligations.
  - We must collect certain personal information to comply with Anti-Money Laundering law. This depends on your policy type and may include items such as up to date proof of identification and address.
  - We use our customers' personal information, including yours, to identify the target market for our regulated products and services.
- When you give us your personal information we will check to see if we already have a record of you.

The above helps us to comply with your Data Protection rights. Please see Section 10 of this Data Privacy Notice for more details about your rights.

### **PFP's legitimate interests:**

We use your personal information for our legitimate interests as shown above. This doesn't affect your privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions using the contact details above. You can object to this processing at any time.

In any event, PFP 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.

PFP 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 DO WE PASS YOUR PERSONAL INFORMATION TO?**

We pass personal information to:

- Insurers/ Providers: We share your personal information with the relevant insurer(s) to provide you with quotations, to process your applications to allow policies/ plans to be put in place
- Your Authorised Representatives: We share your personal information with third parties you have nominated to deal with our company on your behalf
- Data Processors: We share your personal information with companies that act as service providers under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used

by other parties for any other reason. The categories of services that we use other Data Processors for include: document management and disposal, to facilitate the application process for cover, customer services, making and receiving payments and marketing.

- Trustees: We share your personal data with appointed trustees in connection with the policy contract.
- Regulators and other official agencies: Regulators, an Garda Síochána, the Revenue Commissioners, other official agencies or as needed to comply with regulations and laws and on foot of a Court Order or Subpoena.

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.

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:**

PFP 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**
- **Right to judicial review:** in the event that PFP 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. PFP 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 PFP, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and PFP's data protection representatives Data Protection Officer / GDPR Owner

## **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**

### 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.

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

## **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 01 498 0007 or email [info@pfp.ie](mailto:info@pfp.ie)

## **Privacy policy statement changes**

PFP 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.