



**Inverdea Financial Services, Inverdea House, 2 Bridge Street, Wicklow Town, Co. Wicklow
T: (0404) 67123 | F: (0404) 25906 | E: dduke@inverdea.ie | W: www.inverdea.ie**

Privacy Notice/Statement

Introduction

Inverdea Financial Services Limited (Inverdea Financial Services) recognises that protecting personal information is very important to you. It is the intention of this privacy notice statement to explain to you the information practices of Inverdea Financial Services in relation to the information we collect, use and store about you. It is supplemental to the Data Protection Notice provided to you in our Terms of Business. It sets out in more detail how we handle and manage your personal information including sensitive data we may process. Personal data relates to you, anyone insured under your policy or anyone whose personal data we process in connection with your policy/portfolio and applies to all your dealings with us.

Inverdea Financial Services 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 General Data Protection Regulation (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 Inverdea Financial Services in relation to the information we collect about you.

For the purposes of the GDPR the data controller is Inverdea Financial Services Limited. The Contact Details of Inverdea Financial Services Limited are:

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When we refer to 'we', it is Inverdea 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?

Inverdea Financial Services are financial brokers who provide bespoke financial advice to individuals, employees and business owners. We provide advice about savings, investments, pensions, life insurance, serious illness, income protection, mortgages, health insurance and general financial planning.

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

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Purpose for collecting and processing your data

As a financial broker, the personal data we collect from you is passed on to an insurance company in order to obtain a premium and provide you with a quotation in relation to a service you have requested, arrange a transaction on your behalf, administer, manage your policy, provide premium renewal details and assist with claims as part of our service. We may also collect your personal data to verify your identity or to compile and process your information for audit, statistical or research purposes, for compliance with regulatory and legal requirements, for internal record keeping and to protect your vital interests. We may also process your personal data where we have a legitimate interest to do so, subject to those interests not over-riding your fundamental rights and freedoms. This includes: market research and statistical analysis to improve our services and products, to protect our business, reputation, resources and equipment, manage network and information security and prevent and detect fraud, dishonesty and other crimes, investigating complaints, training and monitoring staff.

The personal data we will collect from you and process, where relevant, is dependent on the type of product you are seeking, this is not a limited list and may include:

- **Personal**, such as title, full name, address, landline telephone number, mobile number, work number, email address.
- **Your date of birth, gender and/or age, PRSI number,**
- **Your nationality**, residency and/or citizenship status, if needed for the product or service.
- **Details of beneficiaries**, such as joint policy holders, beneficiaries of our products or services.
- **Family members** (if relevant to the product or service).
- **Your marital status, family, lifestyle or social circumstances**, if relevant to the product (for example, the number of dependents you have or if you are a widow or widower).
- **Records of your contact with us** such as via phone, if you get in touch with us online using our online 'contact us' services or details such as your mobile phone location data, IP address, records of landline telephone recordings.
- **Products and services** you hold with us, as well as have been interested in and have held and the associated payment methods used, including existing policy number, client identification number, renewal dates of policies with us and other insurers, premium details, details of excesses, images/surveys.
- **The usage of our services**, any claims and whether those claims were paid out or not (and details related to this).
- **Bank details,**
- **Marketing to you**, including history of those communications, whether you open them or click on links, and information about products or services we think you may be interested in, and analysing data to help target offers to you that we think are of interest or relevance to you.
- **Information about your use of products or services held with the firm**, such as financial services and products.

- **Information we obtained from third parties**, including information about insurance risk, instances of suspect fraud and usage history.
- **Fraud, debt and theft information**, including details of money you owe, suspected instances of fraud or theft, and details of any devices used for fraud.
- **Criminal records information**, including alleged offences.
- **Information about your health or if you are a vulnerable customer**. Injuries/illnesses suffered by you or anyone insured on the policy either prior to taking out an insurance or during policy coverage.
- **Information about your property**, such as location, value, number of rooms, property type.
- **Financial details about you**, source of income, source of wealth, details of your expenditure, and payment method(s), if relevant.
- **Details about all of your existing borrowings and loans**, if relevant.
- **Information about your employment status**, if relevant.
- **Information about your property occupier status**, such as whether you are a tenant, live with parents or are an owner occupier of the property where you live at the time of your application.
- **Information we obtain from third parties**, including publicly available information, and information to help improve the relevance of our products and services.
- Where relevant, **information about any guarantor** which you provide in any application.
- **Tax information**, if relevant (for example, for tax planning purposes).

Note: Some personal data is mandatory in order for the performance of the contract. In the event you decide not to provide the mandatory personal data we will be unable to provide you with a certain service or product. We will indicate to you where any personal data required is mandatory or optional.

Why we are processing your data? Our Legal Basis.

In order for us to provide you with financial advice, we need to collect personal data to provide the appropriate recommendations for your circumstances. Our reason (lawful reason) for processing your data under the GDPR is:

Legal basis – we need to process your data as this is necessary in relation to recommending a particular financial product. We need to assess your financial circumstances in order to ensure the financial product we recommend is suitable for your circumstances. We are required by law to collect your personal information to set up an insurance contract, investment or mortgage product.

To use your information lawfully, we rely on one or more of the following legal bases:

- your consent;
- performance of a contract;
- legal obligation;
- protecting the vital interests of you or others;
- public interest; and
- our legitimate interests or the legitimate interests of a third party (e.g. your employer).

In any event, 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 Inverdea Financial Services use the personal data it collects about me?

We 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.

Where we collect any special categories of personal data, known as 'sensitive data' e.g. health, religious beliefs, racial, ethnic origin, we will ensure to obtain your explicit consent. This will only be requested and processed where it is necessary for the performance of an insurance contract and will only be processed by way of a) explicit consent b) assessment of risk c) for the prevention of fraud d) for the establishment, exercise, enforcement or defence of legal claims or e) to protect the vital interests of a person.

Who we are sharing your data with?

We may pass your personal data on to third-party service providers contracted to Inverdea Financial Services 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 fulfill the service they provide on your behalf. When they no longer need your data to fulfill this service, they will dispose of the details in line with their 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:

- Aviva Life & Pensions
- Friends First Life Assurance Company
- Irish Life Assurance Plc
- Irish Life Health
- New Ireland Assurance Plc
- Royal London
- Standard Life Assurance Plc
- Zurich Life Assurance Plc
- J & E Davy
- Cantor Fitzgerald Ireland Ltd
- Wealth Options
- Newcourt Retirement Fund Managers Limited
- BCP Asset Management
- Blackbee Investments
- Quilter Cheviot Europe Limited
- Conexim Advisors Limited
- Independent Trustee Company Limited
- KBC Bank Ireland plc
- Permanent tsb plc.

We may also be required to share your data with other third parties involved in administering your insurance contract.

These third parties are obliged to keep your details secure, and use them only to fulfil the service they provide on your behalf. In order to fulfil our legal and regulatory obligations we may also share your personal data with any authorities for example: The Data Protection Commission, Revenue Commissioners, Central Bank of Ireland, Financial Services and Pensions Ombudsman, our legal advisors or the Garda Síochána. When we believe we have been given false or misleading information, or we suspect criminal activity we must record this and inform the relevant authorities. Your data is held by Inverdea Financial Services Limited and may be shared with any providers or suppliers where the firm outsources the processing of certain functions, for example: Auditors, Legal advisors, IT/Software providers, Payment Processes or other third parties involved in administering your contract. Your data may also be shared with any party where you have given us permission to speak with them i.e. a relative or friend, any party named under your insurance.

In the instance where we have to transfer data outside the European Economic Area (EEA) to help provide you with products and services, we will do so in compliance with obligations under Data Protection Legislation and would expect the same standard of data protection is applied outside of the EEA to these transfers and the use of the information, to ensure your rights are protected.

Data Subjects Rights:

Inverdea Financial Services Limited facilitate your rights under Data Protection Legislation to address any concerns or queries about the processing of your personal data. 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;
- Rights of Rectification – you have a right to correct data that we hold about you that is inaccurate. In certain cases you are obliged in the terms of your insurance contract to inform us of any changes i.e. change of address;
- Right to Withdraw Consent – you have the right to withdraw your consent to your data being processed where we use consent as the legal basis;
- Right to be forgotten – you have the right to have your personal data deleted or to be forgotten. However we can only delete your data in certain circumstances and there may be instances where we cannot provide a deletion i.e. an ongoing claim;
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing of your data;
- 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 be excluded from profiling or automated processing; you also have the right to be subject to the legal effects of automated processing or profiling;

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.

Data security

Inverdea Financial Services intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect, including the use of encryption when collecting or transferring sensitive data. However, you should always take into consideration that the internet is an open forum and that data may flow across networks with little or no security measures, and therefore such information may be accessed by people other than those you intended to access it.

Retention of your Personal Data

Data will not be held for longer than is necessary for the purpose(s) for which it was obtained. Inverdea Financial Services will process personal data in accordance with our retention schedule. For the majority of Policy Data, this is seven years after the relationship ends. If you do not incept cover for an insurance policy, your data will be kept for 18 months and processed in line with this statement. In certain cases we are obliged to hold onto records for longer periods, e. g. pension details. We do so in line with our regulatory obligations.

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 & Automated Decision Making

We use automated decision-making, including profiling, in the following situations:

1. Risk Profiling – To establish a customer's attitude to investment risk (relating to pensions and investments);
2. Establishing affordability and providing quotations for financial services and mortgage products;
3. 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.
4. Any form of risk assessments for Fraud Prevention/Anti-Money Laundering purpose or other Legal/Regulatory reasons.

You have the right to object to profiling in certain cases only i.e. where it is not required for the performance of the contract or not required for any legal or regulatory reason.

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. Where we have your consent to send you information about any other products, services or offers which Inverdea Financial Services would like to communicate to you, we may contact you through a variety of means such as mobile phone, landline, email, SMS (text) and post. This can include you being contacted on or about the anniversary of your policy lapsing or your quote request. It is always your choice whether you want to receive any marketing based information. You can also change your preferences of how we contact you or amend how you receive any marketing at any time by contacting:

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If you choose not to receive this type of information, it will not affect any of the services provided to you, now or in the future.

Cookies

This website uses cookie technology. A cookie is a piece of text stored by the browser on your computer, at the request of our server. We may use cookies to deliver content specific to your interests and to save your personal preferences so that you do not have to re-enter them each time that you connect to our website. You are always free to decline our 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: If you decline our cookies or ask for notification each time a cookie is being sent, this may restrict your ease of use of this website.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Inverdea Financial Services or how your complaint has been handled, we encourage you to contact in the first instance:

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You also have a right to lodge a complaint with the Protection Commission – info@dataprotection.ie.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact:

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Privacy Policy Statement Changes

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

Last Updated: 1st May 2020

Inverdea Privacy Statement: V2