

Privacy Notice

This notice has been updated October 2020 (V3)

What is a privacy notice and why is it important?

We know your personal information is important to you and it is important to Hennelly Finance too. This Privacy Notice tells you what we use your personal information for and explains your rights around how we use it. Please read this 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 Privacy Notice, as it also applies to them.

Introduction

Hennelly Finance Services Ltd., t/a Mortgages 4U 24/7 & Hennelly Finance fully respects your rights to privacy and is committed to strict adherence to General Data Protection Regulations (GDPR) which becomes fully effective on 25 May 2018, as well as the provision of Data Protection Act 2018.

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 notice to explain to you the information practices of Hennelly Finance in relation to the information we collect about you. Please read this notice 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.

For the purpose of the GDPR the data controller is:

Hennelly Finance*, Unit 3B, Tí Phuirséil, Barna, Galway.

Phone: 091-586500

Email: dataprotection@hennellyfinance.ie

** When we refer to 'we' it is Hennelly Finance*

Who are we & what we do

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life & pensions/mortgages/health & general insurance products. A full list of insurers, product producers and lending agencies with which we deal is available on request.

Our Data Protection Officer / GDPR Owner can be contacted directly on:

Ruth Hennelly

Phone: 091-393299

Email: ruth@hennellyfinance.ie

What personal information we collect and why?

We use personal information to give you financial planning, advice and other separate services. If you ask us to provide financial advice, we will assess your financial needs and recommend financial solutions to help meet your identified needs.

Purpose for processing your data

We collect personal information that you provide to us which is information that identifies you as an individual. We only use this when you have provided us with the information, and you have given your consent that we can use this information for the purpose set out in this Privacy Statement.

When we collect information about you, we intend to tell you why we are asking for the information and what we intend to do with it. You will have the option of not providing the information, in which case you may still be able to access other parts of our website, although you may not be able to access certain services. The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to verify your identity, send you information or contact you in relation to an Hennelly Finance product or service that you are using or that we believe may be of interest to you after you have chosen to 'Opt in'. It also allows you subscribe to our newsletter.

Why we are processing your data? Our legal basis

When enquiring about a product, you may be asked to provide information. We will inform you at the time of collecting information from you whether you must provide the information to enter into a contract for a product or whether the provision of information requested by us is optional.

- We may collect and process the data about you.
- If you contact us, we may keep a record of correspondence/conversation.
- Information that you submit when you apply for a product, which may lead include but is not limited to your name, email, address, payment details, renewal date(s) and date of birth.
- Where you are applying or using our website to deal with a product in connection with life assurance or health insurance, details concerning your health, previous medical history, age and health status.
- Other sensitive data may be collected in the event of a claim, details of which will be provided at the time.
- Other information when you use our website for travel insurance.
- Your contact details to receive our regular newsletter.

The legal basis for processing your personal information is that you have given us consent. This consent can be given at the time of initially seeking our services/quote or having read the company Privacy Statement providing explicit consent to our continuing use of personal data you have supplied us.

In any event, Hennelly Finance 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.

Legitimate Interest

We use your personal information for our legitimate interests as shown below. This does not affect your privacy rights. We have taken account of any privacy risks and ensured that your data protection rights are not affected. We believe these uses benefit our customers.

Call Recording

For compliance and customer service we record and monitor calls. This includes Voice over IP (service provider Magnet). We let you know if a call is being recorded at the start of the call so you can decide to continue or not.

Sharing with product providers

For financial advice and planning services, we will share some of your relevant personal information with product providers in order to obtain quotations and service your plans.

Customer queries and service requests

When you send us a query or request a service, such as a call back, we will collect and use the personal details needed to respond to your request.

How will Hennelly Finance use the personal data it collects about me?

Hennelly Finance 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 belief, 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?

To provide you with an efficient service, your personal data may be shared onto third-party service providers contracted to Hennelly Finance 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 requested. We may also disclose your information to contracted companies who act as “data processors” on our behalf. Our data processors include software and technical support providers, IT consultants and marketing technology platforms, Call answering provider. We only share information with third parties who help us in the delivery of our services. These third parties may not use that information for any purpose other than assisting us in providing us with these services. Any contact information that you provide through our system will not be sold/rented/leased to any third party for selling or marketing to you. We will only provide third party companies with the personal information they need to deliver the appropriate service.

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.

Collection and Use of Personal Information

We collect your personal information directly from you or voluntarily via our website: www.hennellyfinance.ie. The site is hosted with Namesco Limited (Register365) and stored on their secure servers inside the European Economic Area ('EEA'). <https://www.names.co.uk/info/terms/privacy-policy>

We use HotJar to improve our website and experience of the visitors. Please check HotJar Privacy Policy here: <https://www.hotjar.com/privacy>

We will not collect any personal data about you on this website without your clear permission apart from information you volunteer via the following web pages;

“Contact us”

“Sign up to our newsletter”

Through contact forms on www.hennellyfinance.ie you have an opportunity to send us information.

By submitting your data, you are providing us with some level of personal information.

This information is stored on our WordPress website. Your data is also emailed to our website email address where it is saved, so we can respond to your enquiry. Additionally, we may use your contact details to send you marketing material in the future. You may unsubscribe from any emails you receive after the first reply. <https://wordpress.org/about/privacy/>

Contact Forms

Through contact forms on www.hennellyfinance.ie you have an opportunity to send us information. By submitting your data, you are providing us with some level of personal information. This information is not stored on our website database, however your data is emailed to our website email address where it is saved, so we can respond to your enquiry. Additionally, we may use your contact details to send you marketing material in the future. You may unsubscribe from any emails you receive after the first reply.

Subscribing to our Newsletter/Mail List:

By choosing to sign up for our subscribe to our newsletter list you are consenting to your data being sent and stored by Mailchimp. You can find out more about how Mailchimp stores and handles your data here. <https://mailchimp.com/legal/privacy/>

Third Party Service Providers

We may pass your personal data on to third-party service providers contracted to Hennelly Finance 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 a manner compatible with the EU's General Data Protection Regulation (GDPR).

Product Providers:

Product providers for the purposes of establishing a contract with the provider. If a contract is established, you will consent to providing this information to the product provider through the completion and signing of their proposal/application form.

Other Service Providers:

Any other 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.

Below are the third parties that we pass your personal data to and how they store and handle your data:

CashCalc - <https://cashcalc.co.uk/privacy>

Broker Information Services - <https://www.bis-platform.com/PrivacyNotice.pdf>

ClearChoice - <https://www.clearchoice.ie/privacy/>

Writeme - <https://www.writeme.ie/privacy/>

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 in 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.

We will not intentionally disclose your personal information to third parties other than as listed above, whether for such third parties marketing purposes or otherwise, except where we believe we are under a legal duty to do so e.g. with the consent of the individual or where required by law.

Data Subjects Rights:

Hennelly Finance facilitates 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 automate 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 Hennelly Finance 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.

How long do we hold personal information?

Personal data is only held for as long as necessary, i.e.

- For as long as required under legal or regulatory requirements or
- For as long as required for legitimate business purposes.

Data is never kept on 'just in case' basis.

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which it was obtained. Hennelly Finance will process personal data in accordance with our retention schedule. This retention period is based on our experience of individuals reverting after a timeframe. The 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 Hennelly Finance or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority: Data Protection Commissioner: Office of the Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois R32 AP23.

Phone +353 (0761) 104 800 | LoCall 1890 25 22 31 | Fax +3535 57 868 47 57 |

E-mail info@dataprotection.ie Web www.dataprotection.ie

Failure to provide further information

If we are collecting your data for a product 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

We use a risk questionnaire for establishing a risk profile of our clients. By using this method, it establishes client's attitude to risk, by identify the risk profile this will allow us to give a more suitable investment strategy. Risk profiling only relates to pensions and investments.

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.

Privacy policy statement changes

Hennelly Finance 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. We encourage you to periodically review this Privacy Statement to stay informed about how we are helping to protect the information we collect.

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 091-393299