

Privacy Statement of Mortgage & Investment Brokers

Mortgage & Investment Brokers 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 GDPR in relation processing your data and ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of Mortgage & Investment Brokers in relation to the information we collect about you.

For the purposes of GDPR the data controller is:

- Dermot Martin Mortgage & Investment Brokers
- Contact details of Dermot Martin 8550777
mibroker2@gmail.com
- When we refer to 'we' it is Mortgage & Investment Brokers

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.

- Mortgage & Investment Brokers is the trading name of Dermot Martin Broker Central Bank reg No c4922. We were established 2001.
- Registered office is 73 North Strand Road, Dublin 3 Eircode D03 E942.
- We are financial brokers regulated by the Central Bank of Ireland. We act for the client when he is buying life assurance, pension, investment, mortgages or illness insurance products.
- Our GDPR Owner and data protection representatives can be contacted directly here: 01-8550777 mibroker2@gmail.com

Purpose for processing your data

- We are contracted by you to collect, present your data to a life company or lender when required by you and to secure your data at all times. We use your data to know our client and advise on your needs which is essential when advising a client. The Life Company, mortgage company or risk insurance company will need some of this information when you wish to purchase a product. We do not use or allow your data to be used for any other reason. There are always risks when handling data so we do it in a highly secure manner.
- Your data may be processed at our office by forwarding it onto electronic copy and sending to an underwriter on a secure internet line. The hard copy is often shredded and if not it is put into a locked fire resistant filing cabinet. The office this cabinet it is held in is locked and the modern office building which has four modern secure locks and has a monitored alarm system. Electronic data is held on our computer system which has a high level internet security system. The back ups onto a master disk in the office and the second on a secure cloud based system. All terminals are password protected.

In order for us to provide you with a financial broker service we need to collect personal data. Our reason (lawful reasons) for processing your data under the GDPR are:

- **Legal basis;** Mortgage & Investment Brokers 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. E.g. a life or savings policy. We are responsible for our advice and have to show a process as to how we arrived at this advice or recommendation.
- We need to hold this info as it can be challenged by an insurer or underwriter or by Central Bank or ombudsmen or client's solicitor or clients themselves, where advice or details may wish to be reviewed.

In any event, Mortgage & Investment Brokers 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.

Mortgage & Investment Brokers 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.

Data Subjects Rights:

Mortgage & Investment Brokers 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
- **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 e.g. direct marketing.
- **Right to object to automated processing, including 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.

Special Categories of personal data

If we collect any special categories of personal data (e.g. health or financial information is not classified as special categories of personal data) – we will have obtained your explicit consent

Who we share your data with when we have your explicit consent.

- A Life company you nominated by completing an application
- A Pension company you nominated by completing an application
- An investment company you nominated by completing an application
- A Pensioner Trustee company you nominated by completing an application
- A mortgage Lender or Brokers Ireland Mortgage Network by completing an application
- Another broker where you have consented and I feel you would get better value
- The ombudsman e.g. in the event of a complaint / dispute
- The Central Bank e.g. in the event of a complaint / dispute

Who are we sharing your data with?

We do not transfer data outside the EU. Some life companies may have a head office in the USA or now that the UK will no longer be in the E.U. In such circumstances, e.g. Standard Life or Irish Life will provide information on the safeguards in place and how the data subject can also obtain a copy of these safeguards;

If Mortgage & Investment Brokers use a provider who is based outside of the EU and the data subject resides within it (the EU), the Organisation Name must provide the data subject with contact details of a data protection representative in the EU;

We may pass your personal data on to third-party service providers contracted to Mortgage & Investment Brokers 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 Mortgage & Investment Brokers 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, e.g. a claim.

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 will not be held for longer than is necessary for the purpose(s) for which they were obtained. Mortgage & Investment Brokers will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body The 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 Mortgage & Investment Brokers or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Mortgage & Investment Brokers' data protection representatives Dermot Martin

Failure to provide further information If we are collecting your data for a contract x 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

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 customers' attitude to various levels of risk having answered a series of questions. In the interest of providing more accurate advice this is a central bank requirement and professional indemnity insurer's requirement.
- b) Establishing affordability and providing quotations for financial services products. We do not input client identifiable details into calculators.

Your privacy is important to us. We put a lot of measures and procedures and we pay a lot to keep your data safe and private. If you have any comments or questions regarding this statement, please contact us on 8550777 or mibroker2@gmail.com

Privacy policy statement changes; Mortgage & Investment Brokers may change this privacy policy from time to time. When such a change is made, we will post or email a revised version online or put it on our web page. 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 April 2018

Mortgage & Investment Brokers are experienced data protection practitioners and all document templates are provided as general guidance