

Privacy Notice/Statement

Introduction

Leahy Investment Advisers 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 Leahy Investment Advisers in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- **Denis Leahy / Paul Leahy**
- Contact details of Leahy Investment Advisers are as follows:
Leahy Investment Advisers
1 Barrack Street
Wexford

Tel: 053-9140080 / 053-9140081
Fax: 053-9140083
Email: info@leahys.ie
- When we refer to 'we' it is Leahy Investment Advisers

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?

Leahy Investment Advisers are Financial Brokers operating within the financial services sector. We provide financial advice, financial recommendations and arrange the setting up of suitable financial products for our clients.

Our Data Protection Representative can be contacted directly here:

Denis A Leahy QFA NCBS
Leahy Investment Advisers
1 Barrack Street
Wexford
Tel: 053-9140080 / 053-9140081

Purpose for processing your data

- We use your data in our endeavours to secure protection, pension and investment plans for you. We will only provide, to the life companies concerned, such data that is required to process and finalise the aforementioned. None of your data, that is not required, will be furnished. Data that we gather, that is not required for the processing of such plans, will be kept in our office.
- Information pertaining to you personally will be processed electronically, by fax and by post.
- Your data will only be used as stated above. Your data will not be used for any other purpose.

Why are we processing your data? Our legal basis.

In order for us to provide you with financial advice, financial recommendations and arrange the setting up of suitable financial products, Leahy Investment Advisers need to collect personal data for the processing of same. Our reason for processing your data under the GDPR is:

- **Legal basis** – Leahy Investment Advisers need 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, i.e. a protection product, a pension product or an investment product.

In any event, Leahy Investment Advisers 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 Leahy Investment Advisers use the personal data it collects about me?

Leahy Investment Advisers 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 that we have your explicit consent to do so.

Who are we sharing your data with?

We will share your data with the respective life companies and entities that we are authorised by the Central Bank of Ireland to deal with.

It is not the intention of Leahy Investment Advisers to furnish your data to third parties unless specifically requested by you to do so. We do not transact with any entities outside the EU. Our website contains a requirement to provide a name, contact number and nature of one's query should a call back be requested. This information will be subject to GDPR requirements and will not be furnished to a third party without your permission.

We may pass your personal data on to third-party service providers 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 GDPR 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:

List of Product Producers List of Lenders

Life & Pensions

Irish Life

Canada Life (now Irish Life)

New Ireland

Zurich Life

Aviva Life & Pensions Ireland Ltd.

Friends First

Caledonian Life (now Royal London)

Standard Life

B.C.P. Asset Management Ltd.

KBC Bank

Mortgages

PIBA Network Services Ltd; with access to the following lenders:

AIB, ICS, PTSB, KBC,

BNP Paribas, HCL, Sol Bank

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 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:

Leahy Investment Advisers facilitate your, our clients', rights in line with our data protection policy and the Subject Access Request Policy. 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. Leahy Investment Advisers will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body Brokers 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 Leahy Investment Advisers or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Denis Leahy of Leahy Investment Advisers.

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

In certain circumstances, i.e. for investment/savings/pension products, Risk Profile Questionnaires will be required to be completed to ascertain your attitude to risk. With regard to protection products, the provision of medical details will be used for underwriting purposes. You can, at any stage, object to this.

Financial and mortgage advisers use profiling (automatic decision making) 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.
- b) Establishing affordability and providing quotations for financial services and mortgage 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 053-9140080 or email us on info@leahys.ie.

Privacy policy statement changes

Leahy Investment Advisers 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.