

Privacy Policy

Introduction

Who are we?

Kirwan Financial Management is a financial services brokerage providing advices, services on a range of products in the areas of family and business protection, savings, investments and pensions. The firm is owned and managed by Thomas Kirwan who is Qualified Financial Adviser.

Privacy Notice

Kirwan Financial Management 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 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 Kirwan Financial Management in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Thomas Kirwan
- Contact details are tkirwan@kirwanfm.ie and 0872401736
- When we refer to 'we' it is Kirwan Financial Management

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.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life, pensions, investments and savings. In order to provide you with relevant information, respond to your enquiries and requests for products and/or services we sometimes request that you provide us with information about yourself. This Privacy notice will inform you of the information we gather and how it is used.

Purpose for processing your data and why?

Generally, we may collect your data for one or more of four reasons based on below;

1. To respond to your request(s) for advice or products or queries in relation to same.
2. Reviewing your financial or insurance position or products as is prudent or required.
3. To recommend products that protect your lifestyle e.g. protecting your in the event of death, accident or illness.
4. Planning your financial future e.g. retirement funding, savings and investment options.

When we collect information about you, we intend to tell you why we 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 this website, although you may not be able to access certain services. In certain areas of our website, we may, where appropriate, enable you to 'opt in' to certain uses of your information e.g. personal data and direct marketing.

Data will not be held for longer than is necessary and general client details will be held while you are a customer. Our Regulator, The Central Bank of Ireland, requires that where clients have products with us that we maintain their data for six years after the last product expires or is cancelled. We will keep your records for 7 years after the business relationship/contract expires to comply with the regulator above and also for stator requirements.

How will Kirwan Financial Management use the personal data it collects about me?

Kirwan Financial Management 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 obtain your explicit consent and we will ensure the below;

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Kirwan Financial Management 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 Kirwan Financial Management 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.

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 Subjects Rights:

Kirwan Financial Management 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** – 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. Kirwan Financial Management will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Kirwan Financial Management or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Organisation Name's data protection representatives Data Protection Officer, Thomas Kirwan at tkirwan@kirwanfm.ie

Failure to provide further information

If we are collecting your data for a contract e.g. Life policy or pension) 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

Profiling;

Financial advisors using profiling in their business. The main categories are

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

- 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) 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.

- c) Establishing affordability and providing quotations for financial services 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 0872401736 or email tkirwan@kirwanfm.ie

Privacy policy statement changes

Kirwan Financial Management 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