



Old Head Financial
PENSIONS | LIFE ASSURANCE | INVESTMENTS | MORTGAGES

DATA PRIVACY NOTICE

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Life, Pensions, Investments and Mortgages. We provide our services from the selection of products provided by the Companies we have agencies with. We recommend the product that, in our professional opinion, is best suited to you. In providing this service to you we will need to obtain personal information from you. The following outlines how we deal with this information, and how it is used. Any questions or concerns you have can be addressed to us directly.

This Privacy Notice sets out the basis on which we gather, use, process and disclose any Personal Data we collect about you, or that you provide to us.

This Privacy Notice applies to you, whether you are a current, past or prospective client. It also applies to third parties whose Data you provide to us in connection with our relationship with you (for example, the names of relatives). Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to us.

Who controls your Personal Data, and how can you contact them

We control your Personal Data to assist us to give you advice and recommendations on your financial affairs. Your data is then passed on to the relevant product providing company/companies by way of inclusion in application forms or similar – this occurs either by post, by e-mail or through secure online portals provided by the product providing company.

You can contact us by telephone on 058 75747, by e-mail at info@oldheadfinancial.ie or by post to Manager, Old Head Financial, Friary Street, Dungarvan, Co. Waterford.

Data we may collect about you

In order for us to give you a recommendation and information on financial products, we need to collect and process personal information about you. If you do not provide the information we need, we may not be able to offer you advice or provide our services to you. The types of personal data that we may require include:

- Individual details: name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you.
- Financial detail – full details on any debts, loans and assets you may hold.

- Identification details - Identification numbers issued by government bodies or agencies, including your PPS Number and passport number.

Special categories of Personal Data

- **Health information** – this has additional protection under Data Protection law. We do not process health information other than hold the information on application forms you have completed. Life insurers process and control your health data to allow them to underwrite your policy or decide to decline cover, they may have further information they have obtained with your approval from your doctor but we are not privy to this information.
- **Claims information** – information you give us regarding claims you notify us about or ask for help on.
- **Policy Information** - information about the quotes you receive and policies you take out.

Where we may collect your Personal Data from

We may collect your personal data from various sources, including:

- Yourself
- Your employer or representative
- Companies we have an agency with
- Any other relevant records existing from business we have previously assisted you with
- Companies we do not have an agency with when we have your written authority to contact such companies in relation to your affairs.

Which of the above sources are used will depend on your particular circumstances and the product or service you are interested/your enquiry relates to.

Legal basis for processing your Personal Data

We will only use your Personal Data for lawful reasons. These are: -

- a) Where the use is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract (such as providing a recommendation).
- b) Where the use is necessary to comply with our legal obligations.
- c) Where you have consented to us using your information in such a way.
- d) Where the use is necessary for the performance of a task carried out in the public interest, such as assisting a regulatory authority's investigation of a criminal offence.

The purposes of processing Personal Data are as follows:

- To give you information on, and provide you with, recommended financial products.
- To disclose data to the policyholder, life assured, beneficiary, trustee, assignee, successors, group company or to other relevant parties.
- To comply with legal and regulatory requirements including Anti-Money Laundering and Sanctions compliance.
- To understand how people interact with our website.
- To determine the effectiveness of advertising, and of marketing campaigns.

Hayes & Hayes (Old Head Financial) Limited t/a Old Head Financial is regulated by the Central Bank of Ireland

CRO No.: 646863

Directors: Vincent Hayes, Shane Hayes

Address: Friary Street, Dungarvan, Co Waterford

Phone: 058 43228

Email: info@oldheadfinancial.ie

Who we share your Personal Data with

In order to provide our services and to comply with legal obligations imposed on us, we may share your personal data with:

Pension Trustees, beneficiaries of Pensions and other financial products, relatives and guardians (in certain circumstances and within the law)
Employers (past, present and prospective)
Legal, financial, investment, medical, & other professional advisers in the process of submitting your application(s)
Businesses that refer your business to us
Any business which we are required by law to share information with e.g. compliance resource companies
Database/server provider (but with all data encrypted)
The Pensions Authority
Stockbrokers we have agencies with
Insurance and Assurance companies we have agencies with
Investment Companies we have agencies with
Central Bank of Ireland (we are authorised by the Central Bank and it has the right to inspect our files)
The Financial Services Ombudsman (in the the event of a complaint)
Data Protection Commissioner
Lenders we have agencies with

How long do we keep your Personal Data

When providing products to you it may be necessary to retain your information for an extended period of time. We keep your information for as long as required by law for the purpose that you gave it to us for. As a general rule for legal and best practice reasons we are required to keep your information for 6 years after the date on which our relationship with you ends.

Your rights to access, transport, correct, delete and restrict the use of your Personal Data

You have the right to access a copy of your Personal Data which we hold on you. In the case of Personal Data you provided to us, you have the right to have it provided in a commonly used electronic format to you or to another Data Controller (subject to applicable Data Protection law). If you would like a copy of your Personal Data, please contact us. Your request will be dealt with as quickly as possible, and in any event within a month of your request. If at that stage we are unable to provide the data you require (due to the complexity or number of requests) we may extend the period to provide the data by a further two months but shall explain the reason why that is the case. There is no charge for the request for your data, but the request must be made in writing by letter or e-mail.

Correcting Your Personal Data

You have the right to have your Personal Data corrected if you believe that we have incorrect data held on you.

Deleting your Personal Data

Subject to any overriding legal obligation requiring us to retain it, you have the right to have your Personal Data deleted. However, erasing your Personal Data may make it difficult or impossible for us to give you information on, provide you access to, or assist in the administration of relevant financial products. If you want your information deleted, please contact us.

Restricting our use of your Personal Data

You have the right to restrict our use of your Personal Data in certain circumstances. If you wish to exercise your rights in this regard, please contact us.

Automated decision making

We do not use automated decision making. Where we advise you that, in our view, you do not qualify or are not eligible for a particular product or service, this will be explained to you, with reasoning, by a member of our team. We are not responsible for the use of automated decision making by any company with whom we have an agency, but any decision made by any such company which is not to your satisfaction, whether made by automated or other means, will be explained to you to the extent possible by a member of our team.

Your right to object and withdraw your consent to your Personal Data being processed

You have the right to withdraw your consent to our processing your Personal Data at any time. However, if we cannot process your data it may make it difficult, impossible or unlawful for us to give you information on, provide you access to, or assist in the administration of relevant financial products. If you want to object or withdraw your consent to your personal data being processed, please contact us.

Your right to make a complaint

If you are dissatisfied about the way we handle your Personal Data, please contact us. We will do our best to address your concerns swiftly and resolve any issues you have. Should you wish to do so, you have the right to complain to the Office of The Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23 (Web: www.dataprotection.ie ... Tel.: +353 (0)761 104 800 ... Fax: +353 57 868 4757 ... E-Mail: info@dataprotection.ie)