

Privacy Notice – Gilroy Gannon Financial Services Ltd

Introduction

Gilroy Gannon Financial Services Ltd 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 Gilroy Gannon Financial Services Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Gilroy Gannon Financial Services Ltd
- Contact details of Greg McGreal is info@ggfs.ie or 071 91 61747
- When we refer to 'we' it is Gilroy Gannon Financial Services Ltd

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?

Based in Sligo, Gilroy Gannon Financial Services Limited, provides expert financial and wealth management advice to individuals, professionals and businesses. We arrange transactions in products such as family and business protection, savings, investments and pensions. We also offer our clients a personalised lifestyle financial planning service.

Our GDPR Owner and data protection representatives can be contacted directly here:

- Gilroy Gannon Financial Services Ltd
- info@ggfs.ie
- 071 91 61747

Purpose for processing your data

Generally, we may collect your data for one or more of the reasons noted 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 as is prudent or required. We will ask for personal and financial information depending on the query and this can include health, employment, pension and salary information.
- 3) To recommend products that protect your lifestyle e.g. protecting your family in the event of death.
- 4) Planning your financial future e.g. retirement funding, savings and investment options.
- 5) To provide a financial planning service using cashflow analysis
- 6) We must collect certain information to comply with Anti-Money Laundering law

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. Data will not be held for longer than is necessary. Data will be held for the duration of the transaction 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 a minimum of six years after the last product expires or is cancelled.

Why we are processing your data? Our legal basis.

In order for us to provide you with our life and pensions or lifestyle financial planning service, Gilroy Gannon Financial Services Ltd, need to collect personal data for Life and Pensions or Lifestyle Financial Planning. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** - Gilroy Gannon Financial Services Ltd 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.

In any event, Gilroy Gannon Financial Services Ltd 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 Gilroy Gannon Financial Services Ltd use the personal data it collects about me?

Gilroy Gannon Financial Services Ltd 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 endeavor 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 the below

- we will obtain your explicit consent

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Gilroy Gannon Financial Services Ltd 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 Gilroy Gannon Financial Services Ltd 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 may pass your personal data to are:

- Data Processors
- Trustees
- Health Professionals
- Regulators
- Insurance Companies
- Investment/Real Estate Service providers
- Accountants and Tax Advisors providing services on your behalf

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:

Gilroy Gannon Financial Services Ltd 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 Gilroy Gannon Financial Services Ltd 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. Gilroy Gannon Financial Services Ltd will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body Central Bank and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Gilroy Gannon Financial Services Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Gilroy Gannon Financial Services Ltd's GDPR Owner.

Failure to provide further information

If we are collecting your data for a contract 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 and mortgage 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.

Our Regulator, The Central Bank of Ireland, requires that we establish a customer's ability to afford the cost of a financial product before proceeding with a transaction. We have automated processes that enable us to calculate the costs of products including protection insurances. These costs can vary between customers depending on matters such as age, term of a proposed product, type of product and product features. A customer's health may also have a bearing.

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 (071) 91 61747 or email info@ggfs.ie

Privacy policy statement changes

Gilroy Gannon Financial Services Ltd 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