

Privacy Notice

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.

For the purposes of the GDPR the data controller is:

- Gilroy Gannon Financial Services Ltd.
- Contact details of Greg McGreal is greg.mcgreall@ggfs.ie or 087 297 4287
- When we refer to we/us, we mean Gilroy Gannon Financial Services Ltd

Please read this Privacy Notice 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 representative can be contacted directly here:

- Gilroy Gannon Financial Services Ltd.
- Contact details of Greg McGreal is greg.mcgreall@ggfs.ie or 087 297 4287
- When we refer to we/us, we mean Gilroy Gannon Financial Services Ltd

How do we collect your information and what information do we collect?

The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data.

Our organisation collects personal data in the following ways, if you:

- For prospective clients we collect personal data necessary to help make recommendations suitable to your needs and circumstances and which may be required for future transactions. The personal data we gather initially includes contact details, address, date of birth, employment details, financial information and an assessment of risk profile, if applicable.
- For existing clients we collect personal data necessary to communicate with you in regard to your existing business and also to advise you of other products we deem suitable for you.
- We may hold information about you which includes sensitive personal data, such as medical information where for example you apply for a protection policy. We will only hold this information when we need to for the purposes of the services we provide or where we have a legal obligation to do so.

What information do we collect?

The information we collect about you includes the following:

1.	Contact and Identifying information , e.g., name, address, contact details; email, mobile, landline
2.	Unique identifiers e.g. <ul style="list-style-type: none">• PPS number – the reason why we collect your PPS number is because it is required by product provider for certain products such as pensions.• pension scheme reference number- the reason why we collect this is liaise with pension providers.• insurance policy numbers, the reason why we collect this is to accurately liaise with product providers.
3.	Demographic details , age, gender, marital status, lifestyle, and insurance requirements; date of birth, dependents, photo ID, as well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. E.g., your children/spouse
4.	Family and Beneficiary Data, e.g. , dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant.
5.	Employment information e.g., role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history; <i>This information is necessary for our Fact Find with our clients.</i>
6.	Publicly available sources: e.g., Information about you in the public domain such as Director information from the Companies Registration Office.
7.	Health information such as information about your health status, medical records and medical assessment outcomes; We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol), medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information. This is required for medical underwriting on protection products.
8.	Pensions and Insurance Benefits information such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, PAO.
9.	Financial details e.g., bank account details, details of your credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details.

10.	Claims Data (From you and any relevant third parties). In the event of claims the product provider may request additional details specific to a claim. For pensions, this could be salary or bank details and for protection, it could be medical data.
11.	Marketing preferences: <i>we will only send you direct marketing if you explicitly consent.</i>
12.	Online information: e.g., information about your visits to our websites; Please refer to our cookie policy on our website.
13.	Events information e.g., information about your interest in and attendance at our events, including provision of feedback forms;
14.	Social media information (e.g., likes and posts) with our social media presence; this includes, LinkedIn, Twitter, Facebook
15.	Criminal records information e.g., the existence of or alleged criminal offences, or confirmation of clean criminal records for motor products.
16.	Searches that we undertake in relation to sanctions, money laundering and credit checks. We use VisionNet for the checks.
17.	Calculators on our website. We use this data to perform calculations to prepare quotations for life insurance or pensions.

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

Information we automatically collect.

We sometimes automatically collect certain types of information when you visit our websites and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your expressed consent. Further information about our use of cookies can be found in our Cookie Notice at the footer of our web page.

<https://ggfs.ie/privacy-and-cookie-policy>

How do we use your personal data?

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for insurance, investment, protection, pension products, independent financial advice, quotes.

1.	Performing services for our clients and prospective clients – when you require insurance/investment products, we use your data to enable us to provide the required product
2.	Statutory and other regulatory requirements – we are required to carry out various obligations which include: <ul style="list-style-type: none"> • AML/Sanction checking • Knowing your customer “Fact Find” • Adherence to the Consumer Protection Code
3.	Communicate and marketing to you
4.	Process claims – information you give us with regards claims you notify us about or ask for help on.
5.	To contact you if required or to respond to any communications that you might send to us.
6.	Carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.
7.	Provide professional services.
8.	Handling complaints
9.	To notify you about changes to our service

Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data.

Performance of a contract	When we enter a contract with you, we will collect and use your personal data to enable us to fulfil that service.
Legal obligation	The use of some of your personal data is necessary for us to meet our legal obligations e.g., pension contributions for Revenue Certificates, Regulatory purposes to the Central Bank.
Consent	Sometimes we may rely on consent as a legal basis for processing your information. For example, we rely on consent to collect and use personal data for any criminal convictions or alleged offences. This is used when we need to assess risk relating to an insurance policy for you. We share this information with other third parties

	<p>where it is necessary to manage these services provided to you – these services include insurance underwriters, reinsurer and other insurance providers.</p> <p>We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time.</p> <p>Sometimes if you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.</p> <p><i>Please insert/delete here any other processing when your organisation relies on consent.</i></p>
Legitimate interests	Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.

If you require further information on any of the above basis for processing your data, we can provide you with further details.

How we share your data

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements.

1.	Insurance Partners where we need to manage the services provided to you such as Product Providers and insurance underwriters. You can refer to their privacy statements on their website for more information about their privacy practices.
2.	Vetting and risk management agencies such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the services.
3.	Medical professionals , e.g., where you provide health information in connection with a claim against your insurance policy; or when we are providing a quote for insurance.
4.	EU Law enforcement bodies , when required to do so by law and/or regulation, or another legal request.
5.	Public authorities, regulators and government bodies , where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity;
6.	Third-party processors: We outsource our processing operations to suppliers that process personal information on our behalf. Examples include IT service providers who manage our IT and back-office systems and telecommunications networks, and accounting and payroll providers, CRM providers.

	These processing operations remain under our control and we have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.
7.	Internal and external auditors where necessary for the conduct of company audits or to investigate a complaint or security threat.
8.	On the sale or reorganisation of our business whether by asset or share disposal or other transaction relating to our business.

Security

The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

Retention

Gilroy Gannon Financial Services Ltd shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

Gilroy Gannon Financial Services Ltd may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

The retention period for each category of personal data will be set out in our [Retention Schedule](#) along with the criteria used to determine this period, including any statutory obligations we have.

Personal data will be disposed of securely.

Data Subjects Rights:

Gilroy Gannon Financial Services Ltd will facilitate your 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. (The erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).
- **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.**
- **Right to make a complaint:** if we refuse your request under rights of access, we will provide you with a reason as to why.

All 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.

Complaints

If 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 with our Data Protection Officer.

You may also lodge a complaint with the Data Protection Commission (DPC) in Ireland, whose details are:

Data Protection Commission
21 Fitzwilliam Square South,
Dublin 2.
D02RD28
Web: www.dataprotection.ie
Email: info@dataprotection.ie

See website for updated contact details to reach the appropriate section within the DPC.

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.

When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

Profiling – automatic decision making.

An automated decision is when we input your personal data into a computer programme and this programme analyses your personal data to provide us with a result. There is no human involvement in the decision making. When we seek to contact you about other services, we may run automated queries on our CRM system to establish the suitability of proposed products or services to your needs.

If a decision is taken by automated means, you have the right to object to this and ask us to reconsider the service you have asked us to provide. Some further examples of automated decisions that we undertake are listed below.

An example:

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 and mortgage product*
- d) Bankruptcy check*
- e) PEP check*

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.

Special Categories of personal data

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health data, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for insurance and pension purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

- a policy of insurance or life assurance,
- a policy of health insurance or health related insurance
- an occupational pension, a retirement annuity contract or any other pension arrangement

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 087 297 4287 or greg.mcgreall@ggfs.ie

Privacy notice/ statement changes

When we update this Privacy Notice/Statement, we will post a revised version online. Changes will be effective from the point at which they are posted. We would encourage you to review our Privacy Notice so that you are aware of updates.

This privacy policy was last reviewed in March 2023
