

# Privacy Notice

Updated May 2018 – V.1

Bruen Financial Services fully respects your rights to privacy and is committed to strict adherence to General Data Protection Regulations (GDPR) which becomes fully effective on 25 May 2018, as well as the provision of Data Protection ACT 2018.

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 notice to explain to you the information practices of Bruen Financial Services in relation to the information we collect about you.

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 & what we do**

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life & pensions / general insurance products. A full list of insurers, product producers and lending agencies with which we deal is available on request.

If you wish to contact us on any issue regarding Data protection, the following are the correct options

Post: Unit 9, Cathedral Buildings, Abbeygate Street Lower, Galway.

Phone: 091-393244

Email: info@bruenfs.ie

This privacy policy deals with your relationship with Bruen Financial Services. When contracting with an insurer for a Bruen Financial Services product using the Bruen Financial Services website you understand that you enter into a separate agreement with the insurer and that you should review the terms and conditions of the relevant Bruen Financial Services product to determine what use the insurer may make of your data, or what additional terms and conditions apply to that insurer's use, that is additional to the use that is envisaged by this privacy policy.

## **Purpose for processing your data**

We collect personal information that you provide to us which is information that identifies you as an individual.

We only use this when you have provided us with the information and you have given your consent that we can use this information for the purpose set out in this Privacy Statement.

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. You will have the option of not providing the information, in which case you may still be able to access other parts of our website, although you may not be able to access certain services. The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to verify your identity, send you information or contact you in relation to a Bruen Financial Services product or service that you are using or that we believe may be of interest to you after you have chosen to 'Opt in'. It also allows you subscribe to our newsletter.

## **Why we are processing your data? Our legal basis**

When enquiring about a product, you may be asked to provide information. We will inform you at the time of collecting information from you whether you must provide the information to enter into a contract for a product or whether the provision of information requested by us is optional.

- We may collect and process the data about you.
- If you contact us, we may keep a record of correspondence/conversation.
- Information that you submit when you apply for a product, which may lead include but is not limited to your name, email, address, payment details, renewal date(s) and date of birth.

- Where you are applying or using our website to deal with a product in connection with life assurance, details concerning your health, previous medical history, age and health status. Other sensitive data may be collected in the event of a claim, details of which will be provided at the time.
- Your contact details to receive our regular newsletter.

The legal basis for processing your personal information is that you have given us consent. This consent can be given at the time of initially seeking our services/quote or having read the company Privacy Statement providing explicit consent to our continuing use of personal data you have supplied us.

In any event, Bruen Financial Services 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 Bruen Financial Services use the personal data it collects about me?**

Bruen Financial Services 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**

When enquiring about a product/service, you may be asked to provide personal information. If you contact us we may keep a record of that correspondence/conversation. When you are applying directly or on our website for a general insurance-based product, data may include but is not limited to your name, e-mail, address, payment details, renewal dates and date of birth. Other sensitive data may be collected in the event of a claim or to avail of a quote, details of which will be provided at the time.

### **Who are we sharing your data with?**

To provide you with an efficient service, your personal data may be shared onto third-party service providers contracted to Bruen Financial Services 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 requested. We may also disclose your information to contracted companies who act as "data processors" on our behalf. Our data processors include software and technical support providers, IT consultants and marketing technology platforms, Call answering provider. We only share information with third parties who help us in the delivery of our services. These third parties may not use that information for any purpose other than assisting us in providing us with these services. Any contact information that you provide through our system will not be sold/rented/leased to any third party for selling or marketing to you. We will only provide third party companies with the personal information they need to deliver the appropriate service.

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:**

Bruen Financial Services facilitates 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 automate 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 Bruen Financial Services 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.

### **Retention of your personal data**

Subject to other applicable legal requirements, should you request a quote for any of our general insurance products online or directly, we will hold your data until your next renewal date from the date you have given consent to us to use it on your behalf. This retention period is based on our experience of individuals reverting after a timeframe. Data will not be held for longer than is necessary for the purpose(s) for which it was obtained. Bruen Financial Services will process personal data in accordance with our retention schedule.

### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Bruen Financial Services or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority: Data Protection Commissioner: Office of the Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois R32 AP23.

Phone +353 (0761) 104 800 | LoCall 1890 25 22 31 | Fax +3535 57 868 47 57 |

E-mail [info@dataprotection.ie](mailto:info@dataprotection.ie)

### **Failure to provide further information**

If we are collecting your data for a product 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**

We use a risk questionnaire for establishing a risk profile of our clients. By using this method, it establishes clients attitude to risk, by identify the risk profile this will allow us give a more suitable investment strategy. Risk profiling only relates to pensions and investments.

### **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.

### **Privacy policy statement changes**

Bruen Financial Services 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. We encourage you to periodically review this Privacy Statement to stay informed about how we are helping to protect the information we collect.

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 091-393244