



## *Privacy Notice/Statement*

*Updated September 2019*

### **Introduction**

Bruen Financial Services 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 Bruen Financial Services in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Joe Bruen
- Contact details – 091 393244
- When we refer to ‘we’ it is Bruen Financial Services

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?**

***Bruen Financial Services specializes in life assurance, pensions and investment advice. We are committed to great products at great prices backed up by a quality service from companies we deal with. As a Financial Broker, Bruen Financial Services offer a "Fair Analysis" of the relevant market.***

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Joe Bruen
- joe@bruenfs.ie
- 091 393244

### **Purpose for processing your data**

- We will only use your data, with your explicit consent, to process applications for life policies. This includes pension, investment, and life assurance policies. Use of your data will have the effect of ascertaining whether or not you are eligible to avail of these policies.
- We will gather general information on yourself and your financial situation in our factfind. This information is stored securely by ourselves and not sent on to any 3<sup>rd</sup> party. We will only use information from the factfind to recommend a financial product or give financial advice to you.

A proposal for the recommended policy (if appropriate) will be completed alongside you, the client, to ensure you are aware of what information/data is being provided to a 3<sup>rd</sup> party. Your explicit consent at this stage is needed to process this proposal/data.

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

In order for us to provide you Bruen Financial Services need to collect personal data for providing you with financial advice. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – Bruen Financial Services 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.  
*We factfind all clients, research all life companies for most suitable product, provide quotes and all information to clients, complete applications alongside our clients and follow through with completing the policy.*

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**

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?**

All 3<sup>rd</sup> party recipients of client's data are based in the EU.

We have also verified all safeguards on protection of private data from each of our life assurance/pension company 3<sup>rd</sup> party providers.

We may pass your personal data on to 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 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 Bruen Financial Services 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 pass your personal data to are:

*New Ireland Assurance, Friends First, Irish Life, BlackBee Investments, Zurich, Aviva, Royal London, Permanent TSB, Standard Life, Newcourt Retirement Fund Managers Ltd, IT, Cantor Fitzgerald, Broker Solutions*

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:**

Bruen Financial Services 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. Bruen Financial Services will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank of Ireland) and our internal governance.

#### **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 and Organisation Name's data protection representatives Data Protection Officer / 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**

We carry out automatic decision making to help inform the data subject (our client). Please note that you, the client, can object to this at any time.

Below are how we profile our clients. This list is not exhaustive:

Profiling;

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) we have automated calculators which calculate the customer's 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 below \* we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

a) 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 (091) 393244 or email [info@bruenfs.ie](mailto:info@bruenfs.ie)

### **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. 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.

*\*From time to time we may contact you via profiling from our customer database in regards to new products/funds/offers that we feel may be of interest to you.*

*This privacy policy was last reviewed in September 2019*

