



## Client Data Protection Notice

Effective 25<sup>th</sup> May 2018




This notice explains how & why we collect personal information about you, how we use it and how you can communicate with us about it.

Our aim is to keep this notice as simple as possible but if you are unaware of any of the terms or want more detail on any of the information here, please see our website at [www.dwfinancial.ie/dataprotection](http://www.dwfinancial.ie/dataprotection). You can also ask for more details at our office or contact Debbie O'Neill.



### 1. Who we are

We are DW Financial ("DW Financial"), based in Unit 2A, SuperValu Shopping Centre, Fairgreen Street, Naas, Co. Kildare. You can contact us by:

	DW Financial, in Unit 2A, SuperValu Shopping Centre, Fairgreen Street, Naas, Co. Kildare.
	+353 (0)45 899 049
	info@dwfinancial.ie

We share your information within DW Financial to help us provide our services and to comply with regulatory and legal requirements.



### 2. Our Data Protection Officer

We have not assigned an official Data Protection Officer to the organisation. All Data Protection enquiries can be directed to Debbie O'Neill at [info@dwfinancial.ie](mailto:info@dwfinancial.ie)



### 3. How & why we collect information about you

We collect personal information from you, for example when we perform a "Factfind" or when you choose to purchase products from our providers.

We use cookie technology on our website to provide basic functionality. No personal information is collected from these cookies.

Depending on your specific circumstances and requirements it might be necessary to process health related information relating to you. Health information is considered "special" data. We treat this information with the extra care it deserves.



### 4. How we keep your information safe

We keep our computers, files and buildings secure and use up-to-date IT security measures and methods to protect your information.

In order to help keep your information safe, we will request you to identify yourself when you contact us to ask about your information.



### 5. How long we retain your information for

When you are a client, we keep your personal information for a period of 6 years after your last contact with us, or when your policy or product concludes. The main reason for this particular time frame is due to the requirements of the Consumer Protection Code. After the 6 years has passed, unless we have a legal obligation or similar valid reason, all your personal information will be deleted.

If you do not become a client, we will delete your "Factfind" details within one month.



### 6. Our Legal Bases for Processing

To use your information lawfully, we rely on one or more of the following legal bases:

- entering into, or the performance of, a contract;
- legal obligation;
- protecting the vital interests of you or others;
- public interest;
- our legitimate interests;
- your consent.

In most cases we will need to process your personal data so that we can take the first steps to potentially enter a contract with you and / or to provide the best advice for your circumstances.

To meet our regulatory and legal obligations, we collect your personal information, verify it, keep it up to date, and delete it once we no longer have to keep it.



### 7. How we use your information

To provide our products & services under the terms and conditions we agree between us, we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with our services.

We use information about you to:

- provide our products & services;
- for administrative purposes;
- identify ways we can improve our products & services;
- maintain and monitor our products & services to you;
- protect your interests;
- protect our interests; and
- meet our legal and regulatory obligations;



## 8. Consent

Sometimes we need your consent to use your personal information (such as, potentially, for example, your health information). Before giving your consent, we will tell you what information we collect, and what we use it for.

You can remove your consent at any time by contacting us.



## 9. Your information and third parties

We share your information with third parties. Most of these third parties are our product providers and need your information in order to assess your application and to offer you their products. Other 3<sup>rd</sup> parties may receive your personal information for reasons such as business administration and legal reasons.

The categories of third parties we may disclose your information to are:

<ul style="list-style-type: none"> <li>• Our product providers</li> </ul>	<ul style="list-style-type: none"> <li>• Solicitors</li> </ul>
<ul style="list-style-type: none"> <li>• Accountants</li> </ul>	<ul style="list-style-type: none"> <li>• IT Support Providers</li> </ul>
<ul style="list-style-type: none"> <li>• Contractors</li> </ul>	

We expect these third parties to have the same levels of information protection that we have.

We may also have to share information with third parties to meet any applicable law, regulation or lawful request. When we believe we have been given false or misleading information, or we suspect criminal activity we must record this and inform law enforcement agencies and our providers.



## 10. Automated Decision Making & Profiling

We do not directly use automated decision making or profiling of customers. However, our product providers do so for the following purposes:

- Risk Profiling
- Establishing affordability
- Providing personalised quotations
- The decline or acceptance of cover based on medical questions answered



## 11. International transfers of data

We process all personal information in the Republic of Ireland only. However, our providers (i.e. the investment or insurance providers) may process your personal information outside of the EU. Their data protection notices will provide further details.



## 12. Your personal information rights

As a customer, you have a range of Data Protection rights which are described below. You can exercise your rights by contacting us at +353 (0)45 899 049, calling into our office, sending us a written request, or contacting Debbie O'Neill.

For personal data that we have about you:

- You can ask us for a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information. This is known as an access request.
- You can update and correct your personal details.
- You have the right to restrict or object to us using your personal information when certain conditions apply. For example, if we process your information based on "Legitimate Interest"
- You can ask us to delete your personal information **if** it is no longer required by us under regulations, legislation, or if your consent was our only basis for processing.
- Where possible we can share a digital copy of your information directly with you or another organisation. This is known as a data portability request. **Please note that right to data portability does not apply to paper-based records.**

When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information.

In general, you are entitled to exercise the rights above free of charge. In certain cases, such as frequent or excessive requests we may charge a fee. If you'd like to learn more about your data protection rights, please visit [www.dwfinancial.ie/dataprotection](http://www.dwfinancial.ie/dataprotection)



## 13. Making a complaint

If you have a complaint about the use of your personal information, please let a member of staff know. This will give us the opportunity to put things right as quickly as possible.

If you wish to make a complaint you may do so by telephone, in writing or by email.

We ask that you supply as much information as possible to help our staff resolve your complaint quickly.

You also have the right to lodge a complaint with the Data Protection Commission in Ireland at [www.dataprotection.ie](http://www.dataprotection.ie).



## 14. Updates to this notice

From time to time we may need to make changes to this notice, such as when we change our technology or change how we use your information.

You can always find an up-to-date version of this notice on our website at [www.dwfinancial.ie/dataprotection](http://www.dwfinancial.ie/dataprotection).