

Introduction

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

For the purposes of the GDPR the data controller is:

- Karen Sheridan
- Contact details: 091 861 001 / 087 939 1832
- When we refer to 'we' it is Curran 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?

- Ross Curran Financial Services Limited trading as Curran Financial Services is regulated by the Central Bank of Ireland as an insurance intermediary, registered under the European Communities (Insurance Mediation) Regulations, 2005. Curran Financial Services is regulated by the Central Bank of Ireland as an Investment Business Firm under Section 10 of the Investment Intermediaries Act, 1995, to provide the services of an investment intermediary.
- Copies of our regulatory authorisation are available on request.

Our data protection representative can be contacted directly here:

- Karen Sheridan
- karen@curranfs.ie
- 087 939 1832

What is your personal information?

The term “personal information” has the meaning given to it in the Privacy Act. Personal information includes information or an opinion about an identified individual, or an individual who is reasonably identifiable from the information or opinion. In summary, personal information is any information about you that can be linked to you.

For what purposes do we collect, hold and disclose your personal information?

We collect, hold and disclose your personal information for the following purposes;

- To provide our services to you, send communications requested by you, answer queries and provide information about existing or new services;
- To process and respond to any complaint made by you; and
- To perform statistical analysis of the Curran Financial Services user behaviours.

Why we are processing your data? Our legal basis.

Our reason for processing your data under the GDPR is:

Curran 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. The type of services provided include:

- Application, submission and issuing of Life, Savings, Investment, Pension or Mortgage plan (policies).
- Financial Planning Report and subsequent recommendations.
- Investment Recommendation Report and;
- General Financial Advice

How do we collect and hold your personal information?

We collect your personal information directly from you via our website www.financial-planning.ie, if you volunteer to make a submission on the ‘contact us’ and/or ‘sign up to our newsletter web pages.

We will not collect any personal data about you on this website without your clear permission apart from information you volunteer via the “contact us” and “sign up to our newsletter” web pages i.e. to contact you in connection with your enquiry and/or to send you our monthly newsletter which may contain marketing material.

In any event, Curran 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.

What personal information do we collect and hold?

Curran 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.

Contact Forms:

Through the 'contact us' section on our website www.financial-planning.ie, you have an opportunity to send us information, more specifically, your name, email address and contact number. By submitting this data, you are providing us with some level of personal information. This information is not stored on our website database, however your data is emailed to our website email address where it is saved, so we can respond to your enquiry. 'Curran Financial Services' does not pass this data on to any third parties.

Subscribing to our Newsletter List:

By choosing to sign up for our newsletter, you are consenting to your data, more specifically, your name and email address, being sent and stored by 'Mailchimp'. You can find out more about how Mailchimp stores and handles your data here. <https://mailchimp.com/legal/privacy/>. Additionally, we use your contact details to send you newsletters which may contain marketing material. You may unsubscribe from any emails you receive after the first reply.

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

How long do we hold personal information?

Personal data is only held for as long as necessary, i.e.:

- (i) For as long as required under legal or regulatory requirements; or
- (ii) For as long as required for legitimate business purposes.

By way of examples: -

- CBI/CPC requirements (retain data for at least 6 years from date of last transaction).
 - Note: FSO requirements on long term investment products or mortgages; and
 - Restrictions on retaining data on Spent convictions (the "7-year rule");
- Data is never kept on a "just in case" basis.

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Curran 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 fulfill 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 Curran 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:

- Mailchimp.com

You can find out more about how Mailchimp stores and handles your data here. <https://mailchimp.com/legal/privacy/>

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.

We will not intentionally disclose (and will take commercially reasonable steps to prevent the accidental disclosure of) your personal information to third parties other than as listed above, whether for such third parties marketing purposes or otherwise, except where we believe we are under a legal duty to do so e.g. with the consent of the individual or where required by law.

Your rights as a data subject:

Curran 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.

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 at any time
- **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.

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Curran 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 Curran Financial Services) or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Curran Financial Services data protection representative.

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 STATEMENT



Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 091 861 001 or email karen@curranfs.ie. We will treat your requests or complaints confidentially subject to our obligations to customers who may have provided us the information. Our Data Protection representative will contact you within a reasonable time after receipt of your request or complaint to discuss your concerns and outline options regarding how they might be resolved.

Privacy Policy Statement Changes

Curran 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.

This privacy policy was last reviewed in April 2018