

Privacy Statement

Introduction

Keaney 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 as a client.

It is the intention of this privacy statement to explain to you the information practices of Keaney Financial Services Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Keaney Financial Services
- Contact details: compliance@kfs.ie or The Compliance Department, Keaney Financial Services Ltd., 30 Lower Leeson Street, Dublin 2.
- When we refer to 'we' it is Keaney Financial Services Ltd

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?

- Keaney Financial Services Ltd have a wealth of experience in providing client specific advice, that is both impartial and cost effective. Our services include advice on Personal & Family Protection, Business Insurance, Retirement Planning and Savings & Investments.

Our GDPR Owner and data protection representatives can be contacted directly here:

- Name: Dick Denieffe
- Email address: compliance@kfs.ie
- Phone number: 01 6618080

Purpose for processing your data

- To process and administer your application and for the provision and administration of Life, Pension and Investment products
- To communicate with a product provider on your behalf, to provide you with a quotation, arranging and administering a policy or investment, handling a claim, etc.
- To offer you products or services which we think may be of interest to you
- To communicate with you by post, telephone, email or SMS for the above purposes (unless you instruct us not to in writing)
- Legislation and various codes of conduct require us to gather additional information from and about you. Should you be unable to provide us with the required personal data, we will be unable to provide you with the required service

Why we are processing your data? Our legal basis.

In order for us to provide you with the services outlined above, Keaney Financial Services Ltd need to collect personal data for the provision of these services.

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

- your consent;
- performance of a contract;
- legal obligation (e.g. "Minimum Competency Code", "Fitness & Probity", Anti-Money Laundering/Counter Financing Terrorism legislation, TCA 1997);
- protecting the vital interests of you or others;
- public interest; and
- our legitimate interests or the legitimate interests of a third party (e.g. your employer).

Our reason (lawful reason) for processing your data under the GDPR is as follows:

- Keaney Financial Services Ltd needs to collate and process your data as this is necessary in relation to a contract of insurance or investment which you have entered into or because you have asked for something to be done so that you can enter into a contract.

We will use and share certain personal data so as to comply with certain legal obligations and regulatory requirements, including:

- To verify your identity and verify the accuracy of what we receive
- To process any payments in relation to your policy or investment, or process a claim
- To make back-ups of your data in case of emergencies and for disaster recovery purposes
- To manage and investigate any complaints
- To comply with laws and regulations
- We may record or monitor calls for regulatory, training and quality purposes

We may also process your personal data for the purpose of our legitimate interests or those of a third party such as:

- Keeping you up to date with information about other products and services we offer
- Requiring sensitive or “special categories” of personal data for the purposes of obtaining insurance cover, when you retire early on grounds of ill health, processing a disability claim, etc.
- Where necessary for the establishment, exercise or defence of a legal claim by us

In any event, Keaney Financial Services Ltd are committed to ensuring that the information we collect and use is appropriate for these purposes, and does not constitute an invasion of your privacy.

How will Keaney Financial Services Ltd use the personal data it collects about me?

Keaney 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 ensure we provide you with the best service possible.

To provide our products and 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 products and services.

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

We may collect special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data) in certain circumstances and only where necessary for the performance of the service required

Subject to suitable and specific measures being taken to safeguard the fundamental rights and freedoms of data subjects, the processing of data concerning health shall be lawful where the processing is necessary and proportionate for the purposes of arranging products or investments, for example:

- (a) a policy of insurance or life assurance,
- (b) a policy of health insurance or health-related insurance,
- (c) an occupational pension, a retirement annuity contract or any other pension arrangement, or
- (d) the mortgaging of property

Who are we sharing your data with?

Your personal data will be treated as strictly confidential, but may be disclosed to and we may request information from a number of external third parties in order to administer a policy or investment, or meet our legal or regulatory obligations, as follows:

- The Pensions Authority, the Financial Services and Pensions Ombudsman, Central Bank of Ireland, Data Protection Commission, Auditors, Professional Advisors, Insurance Companies/Product Providers, in connection with the administration of your policy or investment.
- Our associated company, Keaney Insurance Brokers Ltd, in order to deliver products and services and fulfill our operating entity responsibilities, and so that they may offer a range of products to you.
- Please note that your PPS number is your unique identifier for use in transactions with public bodies and product providers and is used by Keaney Financial Services Ltd for this purpose.

We may also pass your personal data on to third-party service providers contracted to Keaney Financial Services Ltd. 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 fulfill this service, they will dispose of the details in line with Keaney Financial Services Ltd 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.

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:

Keaney Financial Services Ltd 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 appropriate external review:** in the event that Keaney 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.

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. Keaney Financial Services Ltd will process personal data in accordance with our retention schedule. This retention schedule is governed by our regulatory body (the Central Bank of Ireland), legal obligations, and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Keaney Financial Services Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Keaney Financial Services Ltd data protection representatives
Contact details: ddenieffe@kfs.ie

You may also contact the Data Protection Commission in Ireland to lodge a complaint (details below).

Data Protection Commission
Canal House,
Station Road,
Portarlinton,
Co. Laois, R32 AP23
Phone: + 353 57 868 4800 / + 353 761 104 800
Fax: + 353 57 868 4757
Web: www.dataprotection.ie
Email: info@dataprotection.ie

Failure to provide further information

If we are collecting your data for a contract of insurance 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

Certain processing activities may involve the use of automated (computer based) decision making, referred to as Profiling.

Financial advisors use profiling in their business. The main categories are:

a) Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) we use 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, we may 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.

The results of these automated decision making processes may limit the products and services that we are able to offer to you. If you do not agree with the result, you have the right to request human intervention to allow you to express your point of view and contest the decision.

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 to you 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.

Privacy policy statement changes

Keaney Financial Services Ltd may change this privacy policy from time to time. When such a change is made, we will post a revised version online on our website, www.keaneyinsurance.ie 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 July 2018