

- Mortgages
- Life Assurance
- Pensions & Investments
- Home Insurance



## Hiney Financial Services Ltd t/a Park Financial Planning, SwitchMyMortgage

### Data Privacy Notice

**This Data Privacy Notice is effective as and from 9<sup>th</sup> April 2019**

The purpose of this Privacy Notice is to explain how Hiney Financial Services Ltd T/A Park Financial Planning, SwitchMyMortgage ("Park Financial Planning, SwitchMyMortgage" "we", "us" and "our") may process your personal information.

#### Introduction

Hiney Financial Services Ltd t/a Park Financial Planning, SwitchMyMortgage are committed to respecting and protecting your privacy and would like you to feel safe when you give us your personal details. This Privacy Notice together with our Privacy Statement sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. It details how we collect, use, disclose, transfer and store your personal information.

We will always comply with the General Data Protection Regulation ("GDPR") when dealing with your personal data. For the purposes of the GDPR, we will be the "controller" of all personal data which we hold about you.

Our contact details are:

Hiney Financial Services Ltd t/a Park Financial Planning, SwitchMyMortgage, Unit 13, Block C, Cashel Business Centre, Cashel Road, Kimmage, Dublin 12. Our telephone number is 01-4993000 and email is [info@parkfinancial.ie/info@switchmymortgage.ie](mailto:info@parkfinancial.ie/info@switchmymortgage.ie)

If you are providing personal information on behalf of a third party, you must ensure that the third party receives a copy of this privacy notice before their personal information is shared with us.

#### 1. Why do we collect and use your personal information?

Our principle business is to provide advice and arrange transactions on your behalf in relation to Mortgages, Life Assurance, Pension and Investment products. We gather, record and hold information on you in order to provide you with a product or service. We rely on a number of different legal bases to use that information, for example, we use your personal information to process your application and to help administer your products and services, to ensure we provide you with the best service possible and to meet our legal and regulatory obligations.

##### 1.1 To comply with a legal obligation

We are required to process your personal information to comply with certain legal obligations, for example:

- to report and respond to queries raised by regulatory authorities, law enforcement and other government agencies such as the Central Bank of Ireland and An Garda Síochána;

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- to verify the personal information provided to us and meet our legal and compliance obligations, including to prevent money laundering, tax avoidance, financing of terrorism and fraud;
- to cooperate and provide information requested in the context of legal and/or regulatory investigations or proceedings;
- to keep records of communications
- to administer our internal operational requirements (including credit, compliance and risk management, system development, staff training, accounting and for audit purposes);
- to undertake systems testing, maintenance and development and in order to ensure network and information security.

## **1.2 To enter into and perform a contract with you for the services or products which you require**

To process any product/service applications which you may make, we have to gather some personal information. Your data is then passed on to the relevant company/companies we have agencies with by way of application form, by post, email or through their secure websites.

## **1.3 To enable Park Financial Planning, SwitchMyMortgage to function as a business**

In certain circumstances, we process your personal information based on the legitimate interests of Park Financial Planning, SwitchMyMortgage. In doing so, we ensure that the impact of the processing on your privacy is minimised and that there is a fair balance between the legitimate interests of the Park Financial Planning, SwitchMyMortgage and your privacy rights. If you disagree with your information being processed in this manner, you are entitled to exercise your right to object.

Examples of situations in which your personal information is processed based on our legitimate interests, include:

- to keep records of communications, including telephone lines, if required in order to evidence what has been discussed and keep a record of your instructions and to prevent or detect crime;
- to perform research and analysis aimed at improving our products, services and technologies; and
- to establish, exercise and safeguard our rights, including where necessary to take enforcement action) and to respond to claims made against Park Financial Planning, SwitchMyMortgage.

## **1.4 Where you have provided consent**

We use your personal information to make you aware of products and services which may be of interest to you where you have consented to us doing so and in accordance with your preferences. You can at any time withdraw that consent using the contact details below.

In the event that you apply for life assurance or a pension, we may collect and process information on your health. You will be asked for your consent to process this type of personal information.

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## 2. What personal information do we collect about you?

The information we hold about you can vary depending on the products and services you use. This includes personal information which you give to us when you are applying for a product or service, personal information we collect automatically (for instance when you request a quote on the website) or personal information we receive from other sources. The personal information we collect about you may include:

- home address, date of birth, full name, place of birth, identification documents, details of income and source of wealth, nationality and tax identification number;
- information obtained from third parties such as business information providers;
- details of employment status and occupation;
- information that we gather from publicly available sources such as biographies held on the Internet;
- information we learn about you from the way you use our products and services and use our website.

## 3. How is the personal information collected?

We collect personal information from a number of sources, including:

- information we receive directly from you or from a person acting on your behalf;
- information that we gather from publicly available sources such as the Internet.

## 4. Cookies

We may obtain information about your general Internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies are small pieces of information, stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits so that you can access information in a faster and more efficient way. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the website can "remember" you on your return visit. Generally speaking, cookies do not contain personal data from which you can be identified, unless you have separately furnished such information to the website. Some of the cookies we use are essential for the website to operate. For more information on how to manage cookies, including how to disable cookies please visit: [www.aboutcookies.org](http://www.aboutcookies.org).

## 5. How do we use personal information for direct marketing?

From time to time, we would like to make you aware of other products and services that we offer which may be of interest to you. We can do this by using some of the personal information we hold about you. You have a right not to receive such information. You can make changes to your marketing preferences at any time by contacting us at the address below.

## 6. Who do we share your personal information with?

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In order to provide our services and to comply with legal obligations imposed on us, we may share your information with trusted third parties who perform important functions for us based on our instructions and applying appropriate confidentiality and security measures. For example, we may share your personal information with the following third parties:

- Lenders, Insurance and Assurance and Investment companies we have agencies with in the process of carrying out your request for a product or service
- Legal, financial, investment, medical and other professional advisors in the process of carrying out your request for a product or service
- any sub-contractors, agents or service providers engaged by the Park Financial Planning, SwitchMyMortgage (including their employees, directors and officers), such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;

We may also share your personal information with any third parties to whom you have instructed us to share your information with.

We are required to cooperate by law or otherwise through a legal process with Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, an Garda Síochána, the courts, fraud prevention agencies or other bodies

The people and organisations that we may share your personal information with may be located in a country that does not have data protection laws which provide the same level of protection as the laws in Ireland. Some countries already have adequate protection for personal information under their applicable laws. In other countries safeguards will be applied to maintain the same level of protection as the country in which the products and services are supplied. These safeguards may be contractual agreements with the overseas recipient, or it may require the recipient to subscribe to international data protection frameworks. For more information about the European Commission's decisions on the adequacy of the protection of personal information in countries outside the EEA, please visit:

[https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

## 7. Is providing your personal information obligatory?

We are unable to enter into or administer the relationship with you without some personal information about you. In cases where providing your personal information is optional, we will make this clear. In particular it is not mandatory that our clients to sign up to receive marketing communications.

## 8. How long do we keep your personal information?

We need to keep your personal information for as long as necessary to fulfil the purposes for which it was collected (as described above) and to comply with our legal and regulatory obligations.

## 9. Your rights under data protection laws

Your rights are as follows (noting that these rights do not apply in all circumstances):

- The right to be informed about the processing of your personal information;

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- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the right to be forgotten);
- The right to request access to your personal information and to obtain information about how we process it;
- The right to move, copy or transfer your personal information (data portability).

In addition, you have the right to complain to the Office of the Data Protection Commissioner which has enforcement powers and can investigate compliance with data protection laws.

If you wish to exercise any of these rights, you can contact us using the details below.

#### **10. How to contact us**

If you have any questions about this privacy notice or your personal information, please contact

Hiney Financial Services Ltd T/A Park Financial Planning, SwitchMyMortgage, Unit 13, Block C, Cashel Business Centre, Cashel Road, Kimmage, Dublin 12.

Our telephone number is 01-4993000 and email is [info@parkfinancial.ie](mailto:info@parkfinancial.ie) / [info@switchmymortgage.ie](mailto:info@switchmymortgage.ie)

#### **11. Updates**

This Privacy Notice may be updated from time to time and the current version of this Privacy Notice shall be displayed on our website [www.parkfinancialplanning.ie](http://www.parkfinancialplanning.ie) and [www.switchmymortgage.ie](http://www.switchmymortgage.ie)