



Data Privacy Notice

Introduction

David Kinsella Financial Services Limited T/A Kinsella Financial 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 David Kinsella Financial Services Limited in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- David Kinsella Financial Services Limited T/A Kinsella Financial
27 Jessop Street
Portlaoise
Co Laois
Phone: 05786 88591
Email: david@kinsellafinancial.ie
- When we refer to 'we' or 'us' it is David Kinsella Financial Services Limited T/A Kinsella Financial

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?

We are a 100% Irish owned Financial Services company and a member of Brokers Ireland. As a member of Brokers Ireland we must be in a position to place insurance with at least five insurers of the relevant form (life) and therefore can generally give consumers greater choice than agents and tied agents. Our principal business is to provide advice and arrange transactions on behalf of our clients in relation to life, pensions and mortgages.

Our Data Protection Officer is:

- David Kinsella
Phone: 057 86 88591
Email: david@kinsellafinancial.ie

Purpose for processing your data

We use the information you provide to arrange services such as life, pensions and mortgages. We will process your information in compliance with GDPR.

Some of the information we may require can consist of the following:

- **Data Subject Details:** Such as name, address, email, telephone numbers, gender, nationality, marital status, date and place of birth, employer, job title, employment history, family details, relationship to policy holder, insured, beneficiary or claimant.
- **Identification Details:** Identification numbers issued by government bodies or agencies e.g PPSN, tax identification number, proof of address via drivers licence or passport or utility bill.

- **Financial Information:** Bank account or payment card details, income and other financial information.
- **Risk Details:** Information about the insured risk (and others insured under the policy) which we need to collect to assess the risk to insure and provide a quotation. This may include only to the extent relevant to the risk being insured, data relating to, health such as current or former physical or mental health conditions, health status, injury or disability information, medical procedures performed, relevant personal habits such as smoking or consumption of alcohol, prescription information, medical history.
- **Policy Information:** Information about the quotations you receive and policies you arrange.
- **Credit and anti-fraud data:** Credit history, credit score, sanctions and criminal offences, information received from various anti-fraud databases relating to you.
- **Previous and current claims:** Information about previous and current claims (including other unrelated insurances), which may include data relating to your health, criminal convictions or other special categories of personal data and in some cases, surveillance reports.
- **Marketing data:** Where legitimate interest has been identified or if the individual has consented to receive marketing of our products and services and other companies products and services that may interest you.
- **Website usage:** Details of your visits to our website and information collected through cookies and other tracking technologies, including but not limited to your IP address and domain name, your browser version and operating system, traffic data, location data, web logs, and other communication data, and resources that you access.

Why are we processing your data?

In order for us to provide you our services we need to collect personal data as to provide advice and arrange transactions on behalf of our clients in relation to life, pensions and mortgages. Our lawful reason for processing your data under the GDPR is:

- We need 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
- In any event, we 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 we use the personal data we collect about you?

We 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 endeavor 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 that we will obtain your explicit consent

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to David Kinsella Financial Services Limited 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 David Kinsella Financial Services Limited 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:

- Insurers and product providers with whom we hold a letter of appointment.
- Third party service providers contracted to Kinsella Financial.
- Regulatory or legislative bodies.

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.

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. We 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.

Data Subjects Rights:

We 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

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and our Data Protection Officer.

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

The main categories are

- Risk Profiling - To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customer's attitude to various levels of risk having answered a series of questions.
- Profiling for marketing purposes - When we seek to contact you about other services, as outlined above, we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs
- 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 (057) 86 88591 or Email: david@kinsellafinancial.ie

Privacy policy statement changes

We 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.