

# M<sup>c</sup>CARNEY

## FINANCIAL SERVICES

Tel: 01 830 5432

*looking after your future and investments*  
29 Whitworth Road, Drumcondra, Dublin 9.

[www.mccarney.ie](http://www.mccarney.ie)

### Privacy Notice – May 2018

#### Introduction

McCarney Financial Services Limited 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 McCarney Financial Services limited in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- McCarney Financial Services Limited
- 29 Whitworth Road, Drumcondra, Dublin 9.
- Phone (01) 8305432
- Email – [info@mccarney.ie](mailto:info@mccarney.ie)
- When we refer to 'we' it is McCarney Financial Services Limited

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?

- *McCarney Financial Services Limited is a financial services/advisors firm that offers advice and recommendations in relation to the following;*

*Mortgages (including home loans, switchers, buy to let, equity release and commercial)*

*Savings and Investments*

*Pensions*

*Home Insurance*

*Tracker Mortgage Redress*

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

- Ciaran McCarney
- [ciaran.mccarney@mccarney.ie](mailto:ciaran.mccarney@mccarney.ie)
- 01 8305432

#### Purpose for processing your data

- *We are obliged to request personal data in relation to you in particular your employment and finances and will use this data to make suitable recommendations on your behalf.*
- *Your data will be collected and processed by our office. It may be necessary to transmit your information to another provider for example a mortgage company or pension provider so that your application is reviewed by them. We may also need to collect data regarding your health in relation to protection products and will need to transmit this to the relevant insurance companies. All data is transmitted securely.*
- *We will collect only the data necessary to your requirements. We save and store information securely and only hold information for as long as necessary or as set out under our authorisations with the Central Bank. We only transmit your data to third parties where you have given consent to do so.*

**McCarney Financial Services Limited is regulated by the Central Bank of Ireland**  
**McCarney Financial Services Limited is a member of Brokers Ireland**  
**Directors: C. McCarney and A.McCarney. Company Reg No 305790**

**The LPI Awards**  
Mortgage Broker of the Year 2015. 

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### **Why we are processing your data? Our legal basis.**

In order for us to provide you with a suitable recommendation, McCarney Financial Services Limited needs to collect personal data for review. Our reason (lawful reason) and the legal basis for processing your data under the GDPR is explained as follows;

McCarney Financial Services Limited must process your data in or to carry out any query or application in relation to mortgages, pensions, investments, insurance, protection etc. If you are entering into a contract of insurance or any other product mentioned then your data needs to be processed and transmitted to the associated provider in order to carry out your request. McCarney Financial Services Limited 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 McCarney Financial Services Limited use the personal data it collects about me?**

McCarney Financial Services Limited 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.

### **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 to 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 McCarney 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 fulfil 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 McCarney 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 main categories of products are Mortgages, protection products, Pensions, Investments and Home insurance. The information we require in each category is usually (but not limited to) the following;

### **Mortgages**

Completion of our Terms of Business, Financial Planning Review & Politically Exposed Personal declaration form;  
Completed application forms, including consent to a credit check;

AML - face to face meeting, Photo ID, address verification, confirmation of PPSN and marriage certificate or separate/divorce agreement (if applicable)

All personal current account statements, savings statements, deposit statements etc

PAYE - A completed salary certificate, your most recent Employment detail summary and payslips

Self employed – 2 years accounts, chapter 4, form 11s, income and expenditure accounts and tax clearance certificate

Personal/business current account statements

Credit union statements

Credit card statements

Revolut statements

Loan statements

Mortgage statements

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### Pension/Investment

- Completion of Terms of Business, Financial Planning Review, Risk questionnaire and sustainability preferences
- Completed application forms
- AML – to include face to face meeting, photo ID, address verification, confirmation of PPSN & source of funds and source of wealth also required for investments

### Protection products

- Completion of Terms of Business, Financial Planning Review, Risk questionnaire and sustainability preferences
- Completed application forms including medical history, family history, height/weight, smoker status etc.
- AML – (if required) to include face to face meeting, photo ID, address verification, confirmation of PPSN & source of funds and source of wealth also required for investments

### General/Home insurance

- Completion of Terms of Business, Financial Planning Review, Risk questionnaire and sustainability preferences
- Completed application form including all property details
- Previous claims history required
- Customer declarations regarding convictions and previous insurance history

The third parties that we currently pass your personal data to are as follows;

- Aviva General Insurance
- Allianz PLC
- [AIB Mortgage Bank](#)
- Avant
- [Cork City Council](#)
- [Dilosk DAC](#) / ICS Building Society
- [Dublin City Council](#)
- [Finance Ireland Credit Solutions DAC](#)
- [Galway County Council](#)
- [Haven Mortgages Limited](#)
- [Kilkenny County Council](#)
- [Permanent tsb plc.](#)
- [Cantor Fitzgerald Ireland Limited](#)
- [Dolmen Insurance Brokers Limited](#)
- Independent Trustee Company
- [Investec Bank Plc](#)
- [Newcourt Retirement Fund Managers Limited](#)
- Harcourt Life DAC
- Irish Life Plc
- New Ireland Plc
- Royal London Mutual
- Standard Life
- Zurich Life Plc

This list is subject to change.

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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:

McCarney Financial Services Limited 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.

### 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 intend to hold data for a period of 6 years which is sufficient to meet our requirements set out under the updated GDPR regulations, The Criminal Justice (Money laundering & Terrorist) requirements and also satisfies our requirements set out by the Central Bank Consumer Protection Code and Handbook of prudential requirements for Investment Intermediaries.

### Complaints

In the event that you wish to make a complaint about how your personal data is being processed by McCarney Financial Services Limited or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Organisation Named data protection representatives.

### 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

Financial and mortgage advisors using profiling in their business. The main categories are;

- a) Risk profiling.
- b) Profiling for marketing purposes.
- c) Establishing affordability and providing quotations for financial services and mortgage product

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a) Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have 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, as outlined above \* we 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

### 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 (01) 8305432 or [info@mccarney.ie](mailto:info@mccarney.ie)

### Privacy policy statement changes

McCarney Financial Services Limited 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.

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

*This privacy policy was last reviewed in May 2023*

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*Information Source: Atlantic Compliance Ltd*

*Recommended by: Brokers Ireland*

*Atlantic Compliance Ltd are experienced data protection practitioners and all document templates are provided as general guidance.*

*Users of these documents should consult their own legal advisers for legal advice specific to their own circumstances and Atlantic Compliance Ltd accepts no liability of any sort arising from the use of these templates.*

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