

LALOR FINANCIAL SERVICES

Pensions • Investments • Wealth Management • Commercial Loans • Development Finance • Mortgages • Life Assurance

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Privacy Statement

Introduction

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

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?

Lalor financial Services is a registered Financial Broker & is regulated by the Central Bank of Ireland. We provide Financial advice on Investments, Pensions, Life Assurance, Income Protection, Serious Illness Cover & Bank Deposits.

Purpose for processing your data

- We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason & that reason is compatible with the original purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose please contact us.
- If we need to use your personal data for an unrelated purpose we will notify you & we will explain the legal basis which allows us to do so.
- Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Why we are processing your data? Our legal basis.

In order to provide Financial Advice & Service to you, it is necessary for us to collect and process your personal data. We are required, therefore, to inform you of the legal bases for processing your personal data. One such legal basis is that the processing is necessary for the performance of the advisory services contract (and any other contract) that we commit to delivering to you from time to time. Another legal basis is that some processing is necessary for the purposes of the legitimate interest that we have, as a firm that is authorised and regulated by the Central Bank of Ireland, in the proper administration and correct operation of our firm. There may also be circumstances where the legal basis for processing your personal data is consent (where we have sought it and it has been provided to us), in which case that consent may be withdrawn at any time.

In any event, Lalor 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.

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

Lalor 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.

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

Who are we sharing your data with?

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

- Zurich Life Assurance
- Aviva Life & Pensions
- BCP Asset Management Ltd
- Wealth Options Ltd
- KBC Bank Ireland
- PTSB
- Investec Ireland Ltd
- Irish Life Assurance PLC
- Royal London Mutual Insurance Society Ltd
- New Ireland Assurance Co
- Cantor Fitzgerald Ireland
- Merrion Stockbrokers Ltd
- Leeds Building Society Ireland

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:

Lalor 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.

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**
- **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

Retention personal data of your

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Lalor 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 Lalor Financial Services or how your complaint has been handled, you have the right to lodge a complaint with the Organisation Name's data protection representatives Data Protection Officer / GDPR Owner.

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

a) Risk Profiling.

To establish a customer's attitude to investment risk (relates to pensions & 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.

(a) 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 you with 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 **(049)4372939 or email info@lalorfs.com**

Privacy policy statement changes

Lalor 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
