

Finance Company of Ireland Ltd.



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Privacy Notice

Introduction

Finance Company of Ireland 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 General Data Protection Regulations (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 Finance Company of Ireland Ltd in relation to the data we collect about you.

For the purposes of the GDPR the data controller is:

- **Finance Company of Ireland Ltd.**
*Contact details of Finance Company of Ireland Ltd.: 97 Malahide Road, Clontarf, Dublin 3,
Phone number : +353 (1) 832 7250
Websites: <http://www.mortgages.ie> and www.lifeinsurance.ie*
- *When we refer to 'we' it is Finance Company of Ireland 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?

Finance Company of Ireland Ltd (trading as Mortgage Company of Ireland) is regulated by the Central Bank of Ireland as an insurance intermediary, as an investment Intermediary, as a Mortgage intermediary and as a mortgage Credit intermediary.

You may contact the Central Bank on 1890 777 777 or alternatively visit their website www.centralbank.ie to verify our credentials.

Our business is subject to the Central Bank's Consumer Protection code, Minimum Competency Code and Fitness and Probity Standards which offer protection to consumers.

The data we collect

On line quotations

We collect data from you in various calculators of our website. We use this data to perform calculations in order to compare quotations for Life Insurance related enquiries and to compare interest rate, repayment information and other lender features in the case of mortgages.

In some calculators we use the information provided to calculate estimates of facilities available based on our knowledge of assessment criteria and market rules. (Example – How much can you borrow or How much will you save in switching a mortgage)

We may request that you provide us with contact details in order to send you the results of our calculations and to contact you by phone, sms or email, to advise you about the services we provide, to answer any questions you may have and to discuss product options with you.

If we are unable to contact you within a reasonable period of time and unless you have requested that we retain your details, we will permanently delete all the information you have provided when seeking a quotation.

Life Insurance, Mortgage Protection Insurance and Mortgage applications

If you are proceeding to arrange a life insurance or mortgage product through us, we need to collect additional information in order to provide this service to you.

- **Contact & identifying information** such as title, name, address, email, telephone number, gender, marital status, date of birth, PPS number, nationality, country of residence, occupation, employer details and photographic identification.

We require this Data to identify you, contact you and conduct a Suitability assessment, to fulfil our contract with you and to comply with legal obligation (e.g. performance of anti-money laundering checks).

- **Financial information** such as bank details, credit/debit card details (where needed) and income details (where applicable).

We require this data so we can assess your application, to fulfil our contract with you and to comply with legal obligations.

To allow us to provide our products and services and to run our business, we collect and process various categories of personal information such as information about your financial circumstances, your accounts and transactions.

We require this data so we can assess your application, to fulfil our contract with you and to comply with legal obligations.

- **Medical condition and health status** - we collect medical information relating to: personal habits (e.g. smoking and consumption of alcohol), prescription information and medical history

We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information.

We require this Data so that we can fulfil our contract with you.

- **Underwriting information** - for example your job, interests, travel, health, family history and other relevant risk factors. We require this information so that we can fulfil our contract with you.

- **Other sensitive information** - in certain cases, we may receive sensitive information (e.g. PEP status, which is necessary for compliance with anti-money laundering legislation).

We will only process special categories of information where we've obtained your explicit consent or are lawfully permitted to do so.

- **Online information** - for example cookies and IP address if you use our websites.
- **Family & beneficiary's information** - for example marital status, dependants, next of kin or nominated beneficiaries.
- **Contractual information**- for example details about your products and benefits.

How we obtain information?

We may obtain your information from a variety of sources, including information you give to us, or that we gather or learn from how you use our services or operate your accounts, the transactions you make and the technology you use (for example location data, or an Internet Protocol (IP) address or telephone number).

We may also gather information from public sources, such as the press and online search engines.

Who are we sharing your data with?

We will only use and share your information where it is necessary for us to carry out our lawful business activities.

In order to provide a seamless service, we may share your Data (where appropriate):

- With life insurance companies and banks and other companies in the Group such as their branches, subsidiaries, affiliates within the Group, partners of the Group;
- Without your consent or without consulting you, when we believe that it is appropriate to comply with our legal obligations;
- Where required for your product or service;
- On the sale, transfer or reorganisation of our business (or any part of it), asset disposal or other transaction relating to our business;
- With business partners, suppliers and subcontractors with whom we work and/or engage (e.g. auditors, cloud service providers, outsourced service providers) to assist us in carrying out business activities which are in our legitimate business interest.

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.

Data Subjects Rights:

Finance Company of Ireland Ltd facilitates your 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 Finance Company of Ireland Ltd. 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

By providing you with products or services, we create records that contain your information, such as customer account records, activity records, tax records and lending and credit account records. Records can be held on a variety of media (physical or electronic) and formats.

Records help us to serve our customers well, to demonstrate that we are meeting our responsibilities and to keep as evidence of our business activities.

The time periods for which we retain your Data depend on the purposes for which we use it.

We will keep your data for no longer than is required or permitted.

We normally keep customer records for up to seven years after your relationship with us ends, unless we have an obligation to keep it longer (for example due to a Court order or investigation by law enforcement agencies or regulators).

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

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Finance Company of Ireland Ltd. or how your complaint has been handled, you have the right to lodge a complaint directly with us.

Any complaint that you may have in relation to the business service provided should be made in writing to the firm outlining the nature of your complaint. Any such complaint will be acknowledged within 14 days.

The complaint will be fully investigated by Finance Company of Ireland Ltd and a full response will be provided to you.

We will aim to provide this response not later than one month from receipt of your complaint. In the event that you remain dissatisfied with the firm handling and response to your complaint you are entitled to refer your complaint to the Financial Services Ombudsman.

Failure to provide further information

If we need to collect certain 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

Our financial and mortgage advisors use automatic decision making/profiling methods in their business. The main categories of profiling used are:

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

a) 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.

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 +353 (1) 832 7250 or email info@mortgages.ie

Privacy policy statement changes

Finance Company of Ireland Ltd 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 May 2018.