



Complete Financial Advice Limited Privacy Notice/Statement

Introduction

Complete Financial Advice Limited t/a Complete Financial is committed to protecting and respecting your privacy. We wish to be fully 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 Complete Financial in relation to the information we collect about you.

For the purposes of the GDPR the data controller and the data processor is:

- Complete Financial
- Contact details of Complete Financial Advice Limited Suite 439/440 1 Horgan's Quay Waterfront Square Cork T23 PPT8 Tel 021 4271687 mary@completefinancial.ie
- When we refer to 'we' it is Complete Financial Advice 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?

- Complete Financial is a multi-award-winning Financial Planning firm that adheres to a structured and transparent advice process centered on our core pillar of

CLARITY

CONSISTENCY

TRUSTWORTHY

- We are regulated by the **Central Bank of Ireland Ref C 29893** and are licensed to advise and arrange Pensions, Investments, Protection (Insurance) and Business Protection. We work closely with PAYE, Self Employed, Business Start Ups and Professionals.

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

- Mary Murphy
- mary@completefinancial.ie
- 021 4271687
- Suite 439/440 1 Horgan's Quay Waterfront Square Cork T23 PPT8

Purpose for processing your data

We gather data to identify you through our secure online Fact Find/ Financial Summary link which we send to clients or completed manually, including your contact information, your financial details/financial circumstances, your occupation/employment, your marital status, your health and or your financial associations, information about you provided by others, information which you have consented to us using and information in relation to data access, correction, restriction, deletion and requests.

Why we are processing your data? Our legal basis.

In order for us to provide you with financial services and related products Complete Financial need to collect personal data for arranging and providing our financial planning and services products such as Pensions, Investments, Savings, Protection (Insurance) and Group Protection. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – Complete Financial needs 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. Services provided to an individual client such as Pensions, Investments, Savings and Life Insurance Protection and with regards to Group Pensions and Group Life Products we may collect your personal data from your Employer.

In any event, Complete Financial 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 Complete Financial use the personal data it collects about me?

Complete Financial 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 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 Complete Financial 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 Complete Financial 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 listed below

- Zurich Life Assurance - www.zurich.ie/privacy-policy/
- New Ireland Assurance - www.newireland.ie/utilities/privacy-statement/
- Standard Life Assurance – www.standardlife.ie/privacy
- Irish Life Assurance - www.irishlife.ie/privacy-policy
- Aviva Life & Pensions Ireland - www.aviva.ie/lifeandpensions/lpprivacy/
- BlackBee Investments – www.blackbee.ie/privacy-policy-documents/
- BCP Asset Management - www.bcp.ie/privacy-policy
- Friends First Life Assurance – www.friendsfirst.ie/privacy/
- Royal London Ireland – www.royallondon.ie/legal-cookies-/privacy/
- Merrion Solutions – www.merrionprivate.com/application-forms/ Scroll down to Data Protection Notice Form
- Wealth Options – www.wealthoptions.ie/pillar-3-disclosure.asp#page
- Quintas Wealth Management – www.quintaswealthmanagement.ie/
- Bespoke Investments - www.bespokeinvestments.ie/privacy.html
- MoneyCorp Ireland - www.moneycorp.com/ireland/privacy/

- Broker Information Systems. Our Data & CRM system.
www.brokerinformationservices.ie/data-crm.html
- With regards to the destruction, deletion and shredding of our client's data Complete Financial use the services of Cork Confidential Shredding Cork (CCS CORK) Registered as Confidential Recycling Ltd. www.ccscork.com/support CCS (Cork) provides a Secure Shredding Service to Complete Financial for the disposal of our Confidential Waste. We have confirmed with CCS Cork that they are fully compliant with regards to GDPR and hold a copy of their Data Protection Policy Statement on file for review.
- Your legal or Tax Advisor
- Your Employer/ HR Department
- Scheme Trustees and or Registered Administrator for Group Schemes

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 and data processor 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.

Note: Complete Financial currently DOES NOT transfer personal data outside the EU.

Data Subjects Rights:

Complete Financial 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

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. As a general rule, we keep your information for a specified period of time from the date of when your contact ceases and/or you cease to be a client. Typically, this period is 7 years however it may be held for a longer or shorter period depending on a number of factors including the;

- The type of data
- The purpose for which it was collected
- Regulatory rules
- The type of product we have provided

Complete Financial 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 Complete Financial or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and 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 such as Life Protection/Investment/Savings or Pension 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

Profiling;

We as Financial Advisors use profiling in our business. The main categories are

1. Risk profiling - To establish a customer's attitude to investment risk (relates to pensions and investments). We have automated calculators which calculate the customers attitude to various levels of risk having answered a series of questions.
2. 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.
3. 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 021 4271687 or email mary@completefinancial.ie

Privacy policy statement changes

Complete Financial may change this privacy policy from time to time. When such a change is made, we will post a revised version online and date same accordingly. 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.