

# Privacy Statement

## Introduction

Highfield Financial Planning Ltd T/A Highfield Financial Planning and Low Cost Mortgage Protection and Get Life Cover is committed to protecting and respecting your privacy. We wish to be transparent about 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 Highfield Financial Planning in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Highfield Financial Planning
- Contact details of Highfield Financial Planning are 01 546 1100, email info@hfp.ie
- When we refer to 'we' we are referring to Highfield Financial Planning

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?

Highfield Financial Planning Ltd T/A Highfield Financial Planning and Low Cost Mortgage Protection and Get Life Cover is regulated by the Central Bank of Ireland (number C176569) as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations 2018 and as an investment intermediary authorised under the section 10 of the Investment Intermediaries Act, 1995 (as amended). Our registered office is at Lyanmore, Ardagh, Co Longford (Company Number 607822).

Our GDPR Owner and data protection representative is; Eoghan Gavigan

## Why do we process your data?

We collect data to enable the firm to provide a product, service or information to you.

## How do we collect data?

Information is collected via our website

By asking you to complete paper or electronic forms

Recording of phone conversations in some instances

When you apply for a product or service and during the term of the product or service we may carry out searches to verify your identity

## What information do we collect?

- Contact information – your name, address, telephone numbers, email address.
- Before we arrange a product for you we will collect further information such as your personal information, income and expenditure and assets and liabilities.
- Details of visits to this website - information collected through cookies and other tracking technologies such as your IP address, domain name, browser version, operating system, traffic data, location data, web logs and other data such as the pages you access

## Why we are processing your data?

In order for us to provide you with financial advisory services Highfield Financial Planning needs to collect personal data. The legal basis for processing your data under the GDPR is:

- It is necessary to in order to provide you with a product or service
- It is necessary to fulfil our legal obligations
- It is necessary to protect our vital interests
- It is in the public interest
- Its use is in accordance with our legitimate interests
- If you have consented to us doing so

In any event, Highfield Financial Planning 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 we use your information

- To monitor usage of the website
- To communicate with you. By supplying your contact information and ticking the applicable box on our website or in our financial factfind or data protection consent form, you are consenting to us contacting you
  - To provide products and services

- To protect both our interests
- To respond to your queries or make recommendations to you
- To conduct business
- To market our services to you
- To fulfil our obligations to provide you with a service, which may involve us passing your information to third parties
- To meet our legal and regulatory obligations

Highfield Financial Planning 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.

### Consent

Where we need your consent to use your personal information or contact you, such as in the case of direct marketing, we may obtain this in writing, by phone, by post, by email, by text message or through other digital means.

### Special Categories of personal data

If we collect any special categories of personal data we will 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 Highfield Financial Planning 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. When they no longer need your data to fulfil this service, they will dispose of the details in line with their written 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:

- Irish Life
- Zurich Life Assurance Plc
- Aviva Life and Pensions
- New Ireland Assurance Company Plc
- Friends First
- Standard Life
- Royal London

Or such other parties which you request us to contact regarding products you hold or arrange products for you from.

All our third party processors are GDPR compliant.

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

Highfield Financial Planning will 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 by writing to the address below. There will be no charge for the first request however subsequent requests may attract a fee to cover our costs. We may use reasonable means to verify your identity before complying with your request
- **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 Highfield Financial Planning 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**

- If we arrange a product for you we will retain your information for six years after the maturity of the product.
- If we do not arrange a product for you we will retain your information for two years after we last corresponded with you. The reason for this time period is that we often find that clients who make enquiries but do not transact, subsequently do transact up to two years later.
- If we provide you with a service, the nature of which is ongoing (such as financial planning) we will retain your information until six years after the cessation of such service.

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

Nothing in this privacy statement should be taken as conferring an obligation Highfield Financial Planning to retain data for any particular period of time.

### **International transfers of data**

In certain circumstances we may transfer your personal information outside of the European Economic Area (EEA) in order to provide products and services. We expect that any party to whom we transfer data has the same standards regarding storage, use and transfer of information.

### **How we protect your information**

- We use physical methods to protect your information such as secure storage of hardcopy files and shredding of confidential waste.
- We use technical safeguards such as firewalls and data encryption.
- We require our staff to comply with procedures designed to ensure privacy and prevent loss of data.

### **Complaints**

If you have a complaint about how your personal data is being processed by Highfield Financial Planning please let us know so that we can put it right without delay. In the event that you wish to make a complaint about how your personal data is being processed by Highfield Financial Planning or about how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Highfield Financial Planning's data protection representative.

### **Failure to provide information**

If you do not provide sufficient and accurate data;

- we may not be able to assess suitability and provide you with a suitable product or service
- we may not be able to provide any product or service
- we may not be able to continue to provide a product or service

### **Profiling – automatic decision making**

- a) Risk profiling

To establish a customer's attitude to investment risk (in relation to pensions and investments) advisers 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 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**

Any queries or complaints regarding the use of your personal information should be addressed to;

The Executive Director  
Highfield Financial Planning  
6 - 9 Trinity Street  
Dublin 2  
info@hfp.ie  
01 546 1100

### **Privacy statement changes**

Highfield Financial Planning may change this privacy statement 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 statement periodically so you're aware of any changes. By using our services you agree to this privacy statement.

*Version 1.2 – effective date 20 March 2020*