



DMP Financial Ltd.

Privacy Notice/Statement

Introduction

DMP Financial 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 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 DMP Financial Ltd. in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- DMP Financial Ltd.
- Contact details of DMP Financial Ltd.
- When we refer to 'we' it is DMP Financial 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?

DMP Financial Limited ('the firm') is authorised under Regulation 30 of the European Union (Consumer Mortgage Credit Agreements) Regulations 2016 to engage in the business of being a Mortgage Credit Intermediary on behalf of the following undertaking(s): Brokers Ireland Network Services Limited and ICS Mortgages.

The firm is not required to obtain a separate authorisation under Section 116 of the Consumer Credit Act 1995 ('CCA'). However, the firm shall be required to comply with the regulatory requirements set out in the CCA and shall be subject to supervision by the Central Bank in respect of activities carried out in accordance with the CCA. The firm is also authorised to provide advisory services in respect of transactions relating to credit agreements falling within the scope of the European Union (Consumer Mortgage Credit Agreements) Regulations 2016.

*Directors and/or Managers responsible for the mortgage credit intermediation business:
Darach Powell.*

DMP Financial Ltd. Darach Powell, Managing Director, B.Sc. H.Dip. M.Sc. QFA, LIB. Secretary Brendan Powell. Registered in Ireland company registration No. 601741. Registered Office, Glenam, Coleville Road, Clonmel Co. Tipperary. DMP Financial Limited is regulated by the Central Bank of Ireland under the IDR (Insurance Distribution Regulations 2018) and the CMCAR (Consumer Mortgage Credit Agreements Regulations 2016) Reference number: C419498.

*DMP Financial Limited is registered as an Insurance Intermediary to undertake insurance distribution under the European Union (Insurance Distribution) Regulations, 2018 (IDR) in respect of: Life Assurance
(Please see the insurance distribution register at <http://registers.centralbank.ie>)
Directors and/or Managers responsible for the insurance distribution business:
Darach Powell.*

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

- Darach Powell.
- darach@dmpconsultants.com
- 083 0195931.

Purpose for processing your data

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

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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?

DMP Financial Ltd. 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.

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Why we are processing your data? Our legal basis.

In order to provide you with our services (Mortgages, life assurance), 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, DMP Financial Ltd. 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 DMP Financial Ltd. use the personal data it collects about me?

DMP Financial Ltd. 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

We may pass your personal data on to third-party service providers contracted to DMP Financial Ltd. 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 DMP Financial Ltd. 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:

life insurance companies and banks and other companies in the Group such as their branches, subsidiaries, affiliates within the Group, partners of the Group

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:

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DMP Financial Ltd. 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 of your personal data

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

You may also lodge a complaint with the Data Protection Commission in Ireland, whose details are:

Data Protection Commission
Canal House,
Station Road,

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Portarlinton,
Co. Laois, R32 AP23
Phone: + 353 57 868 4800 / + 353 761 104 800
Fax: + 353 57 868 4757
Web: www.dataprotection.ie
Email: info@dataprotection.ie

Failure to provide further information

If we are collecting your data for a contract x 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

You have the right to not be subject to a decision based solely on automated processing. Processing is “automated” where it is carried out without human intervention and where it produces legal effects or significantly affects you.

Automated processing is permitted only with your express consent, when necessary for the performance of a contract or when authorised by Union or Member State law. Where one of these exceptions applies, suitable measures must be in place to safeguard your rights, freedoms and legitimate interests. This may include the right to obtain human intervention on the controller’s part, the right to present your point of view, and the right to challenge the decision.

Profiling – automatic decision making
Profiling;

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

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.

DMP Financial Ltd. will use calculators to establish affordability and to provide quotations.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (083) 0195931 or email DMP Financial Ltd. info@dmpfinancial.ie.

Privacy policy statement changes

DMP Financial 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.



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