



DMP Financial Ltd.

# DMP Financial Ltd – Privacy Policy & Data Protection Notice

**Effective Date: March 2026**

## 1. Our Commitment to Your Privacy

At **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.

## 2. Who We Are

DMP Financial Ltd (Reference No: **C419498**) is the **Data Controller** for the information collected from you.

- **Managing Director:** Darach Powell
- **Contact:** [info@dmpfinancial.ie](mailto:info@dmpfinancial.ie)
- **Address:** Glenam, Coleville Road, Clonmel, Co. Tipperary

## 3. The Information We Collect

To provide bespoke financial advice, we must collect several categories of personal data:

- **Personal Identification:** Name, date of birth, PPS number, Marital status and residency/visa status.
- **Financial Data:** Income, employment details, bank statements, and credit history.
- **Health Data (Special Category):** Medical history required for underwriting life assurance or income protection.
- **Sustainability Preferences:** Your choices regarding Environmental, Social, and Governance (ESG) factors in your investments.
- **Vulnerability Information:** Data regarding health, life events, or accessibility needs to ensure we provide appropriate support.

## 4. Why and how We Process Your Data (Legal Basis)

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for insurance, investment, protection, pension products, independent financial advice, quotes.



1.	<b>Performing services for our clients and prospective clients</b> – when you require insurance/investment products, we use your data to enable us to provide the required product
2.	<b>Statutory and other regulatory requirements</b> – we are required to carry out various obligations which include: <ul style="list-style-type: none"> <li>• AML/Sanction checking</li> <li>• Knowing your customer “Fact Find”</li> <li>• Adherence to the Consumer Protection Code</li> </ul>
3.	<b>Communicate and marketing to you – Email, phone, sms, WhatsApp, DocuSign.</b>
4.	<b>Process claims</b> – <i>Contact DMP Financial Ltd. for claims.</i>
5.	<b>To contact you if required or to respond to any communications that you might send to us.</b>
6.	<b>Carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.</b>
7.	<b>Handling complaints</b> <i>info@dmpfinancial.ie</i>
8.	<b>To notify you about changes to our service.</b>

### Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data.

<b>Performance of a contract</b>	When we enter a contract with you, we will collect and use your personal data to enable us to fulfil that service.
<b>Legal obligation</b>	The use of some of your personal data is necessary for us to meet our legal obligations e.g., pension contributions for Revenue Certificates, Regulatory purposes to the Central Bank.
<b>Consent</b>	Sometimes we may rely on consent as a legal basis for processing your information. For example, we rely on consent to collect and use personal data for any criminal convictions or alleged offences. This is used when we need to assess risk relating to an insurance policy for you. We share this information with other third parties where it is necessary to manage these



	<p>services provided to you – these services include insurance underwriters, reinsurer and other insurance providers.</p> <p>We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time.</p> <p>Sometimes if you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.</p>
<b>Legitimate interests</b>	<p>Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.</p>

We process your data under the following legal grounds:

- **Performance of Contract:** To research, quote, and arrange your mortgage, pension, or insurance.
- **Legal Obligation:** To comply with Central Bank regulations (CPC, CMCAR, IDR) and Anti-Money Laundering laws.
- **Consent:** Explicit consent is obtained for processing medical data and for direct marketing.

## 5. How We Share Your Information

We only share your information with trusted third parties necessary to provide our services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements.

- **Product Providers:** Specifically the life companies (Aviva, Irish Life, Royal London, Zurich) and mortgage lenders (ICS Dilosk, NUA, Brokers Ireland Network Services Ltd.) with which we hold agencies.
- **Legal & Regulatory Bodies:** The Central Bank of Ireland, Revenue Commissioners, or the Financial Services and Pensions Ombudsman (FSPO).
- **Professional Advisers:** Solicitors, Auditors, or medical professionals involved in the underwriting process.

1.	<p><b>Insurance Partners</b> where we need to manage the services provided to you such as Product Providers and insurance underwriters, reinsurers, and loss adjuster. You can refer to their privacy statements on their website for more information about their privacy practices. Our product providers... Aviva, Irish Life, Royal London, Zurich, NUA, ICS Dilosk. Bank of Ireland, Haven Mortgages, PTSB via: Brokers Ireland Network Services</p>
2.	<p><b>Vetting and risk management agencies</b> such as credit reference, criminal record, fraud prevention, data validation and other professional advisory</p>



	agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the services. For further information email <a href="mailto:info@dmpfinancial.ie">info@dmpfinancial.ie</a> .
3.	<b>Legal advisers, loss adjusters, and claims investigators</b> , where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature. For further information email <a href="mailto:info@dmpfinancial.ie">info@dmpfinancial.ie</a> .
4.	<b>Medical professionals</b> , e.g., where you provide health information in connection with a claim against your insurance policy; or when we are providing a quote for insurance. For further information email <a href="mailto:info@dmpfinancial.ie">info@dmpfinancial.ie</a> .
5.	<b>EU Law enforcement bodies</b> , when required to do so by law and/or regulation, or another legal request. For further information email <a href="mailto:info@dmpfinancial.ie">info@dmpfinancial.ie</a> .
6.	<b>Public authorities, regulators and government bodies</b> , where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity; For further information email <a href="mailto:info@dmpfinancial.ie">info@dmpfinancial.ie</a> .
7.	<b>Third-party processors: DMP Financial does not currently</b> outsource our processing operations. However, in future if we were to engage suppliers that process personal information on our behalf. Examples would include IT service providers who manage our IT and back-office systems and telecommunications networks, and accounting and payroll providers, CRM providers.  These processing operations would remain under our control, and we would have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.
8.	<b>Internal and external auditors</b> where necessary for the conduct of company audits or to investigate a complaint or security threat.

## 6. Digital Platforms & Durable Mediums

If you interact with us through our digital platforms, we provide guidance on how to navigate them. We use "durable mediums" (such as PDF documents, secure portals, and email) to ensure that you can store and reproduce information addressed personally to you in an unchanged format.

## 7. Data Retention Periods

### Retention

DMP Financial Ltd. shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

DMP Financial Ltd. may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

Our retention periods are strictly aligned with **Regulation 117** of the Consumer Protection Regulations:



DMP Financial Ltd.

- **Concluded Business:** If you become a client, we generally retain your records for **6 years** after our relationship ends to meet regulatory requirements.
- **Incomplete Requests/Quotes:** If you request a quote or apply for a product but do **not** proceed to a contract, we will only retain your records for **12 months**, subject to your consent or an alternative legal basis.

## 8. Your Rights

### Data Subjects Rights:

DMP Financial Ltd. will facilitate 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. (The erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).
- **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 make a complaint:** if we refuse your request under rights of access, we will provide you with a reason as to why.

All 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.

## 9. How to Complain

If 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 our Data Protection Officer, [darach@dmpfinancial.ie](mailto:darach@dmpfinancial.ie).

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



DMP Financial Ltd.

Data Protection Commission  
21 Fitzwilliam Square South,  
Dublin 2.  
D02RD28  
Web: [www.dataprotection.ie](http://www.dataprotection.ie)  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

See website for updated contact details to reach the appropriate section within the DPC.

### **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.

When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

### **Special Categories of personal data**

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health data, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for insurance and pension purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

- a policy of insurance or life assurance,
- a policy of health insurance or health related insurance
- an occupational pension, a retirement annuity contract or any other pension arrangement
- the mortgaging of a property

### **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 [info@dmpfinancial.ie](mailto:info@dmpfinancial.ie).

### **Privacy notice/ statement changes**

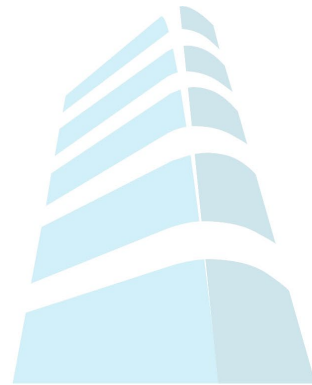
When we update this Privacy Notice/Statement, we will post a revised version online. Changes will be effective from the point at which they are posted. We would encourage you to review our Privacy Notice so that you are aware of updates.



DMP Financial Ltd.

**Darach Powell B.Sc. H.Dip. M.Sc. QFA, LIB.**

**Managing Director, DMP Financial Ltd.**



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