

Data Privacy Notice – Customer Summary

Stephen Hamilton Financial Services Ltd trading as MortgageLine and Northwood Financial Planning takes your privacy and confidentiality seriously. You provide us with personal and financial information and we want you to understand why we collect your data, what we do with it, who we share it with, why we share data, and understand your legal obligations.

This document is being provided to you in line with our obligations under the General Data Protection Regulation (GDPR), which will come into force on 25 May 2018. From that date, the GDPR, together with applicable Irish requirements, will amend existing data protection law and place enhanced accountability and transparency obligations on organisations when using your information. The GDPR will also introduce changes which will give you greater control over your personal information, including a right to object to processing of your personal information where that processing is carried out for our business purposes.

Please take time to read this notice carefully. If you are under 16 years of age, please read this summary with a parent or guardian and ensure you understand it. If you have any questions about how we use your information, please contact us as shown below.

This summary explains the most important aspects of how we use your information and what rights you have in relation to your personal information.

If you would like clarification on any points in this summary document please contact us.

1. Who we are

Stephen Hamilton Financial Services Ltd is a firm of Mortgage Brokers and Financial advisors which provides advice on Insurance and financial matters and arranges transactions or products suited to your needs. Further details of our services are provided in our Terms of Business document which we issue to all customers prior to providing a service or product.

2. The information we collect about you

We will hold:

- data to identify you, including your contact information i.e. name, address, telephone number(s), email address, gender, date of birth, occupation, PPS number, photographic identification, nationality;
- your financial details/financial circumstances as necessary i.e., employment, income, assets, liabilities, bank account details (where applicable);
- your marital or civil status;
- other sensitive information e.g. medical information which you provide to us, where necessary for the service to be provided;
- information about you provided by others e.g. your spouse/partner, professional advisors, etc.;
- information which you have consented to us using;
- other personal information, if applicable e.g. criminal conviction data, driving penalty points;
- telephone recordings of conversations; and
- information provided when exercising your rights.

Sometimes we may use your information even though you are not our customer. For example, you may be a beneficiary under a trust, a director of a client company, an employee of a client, a member of your employer's pension scheme, or be a potential customer applying for one of our products or services.

3. When we collect your information

We collate information at the initial point of contact with you and aim to update this whenever you require a further service or product.

4. How and why we use your information

We collate, use and share information only where there is a legal basis for doing so. This includes where you have given us information in order to provide you with a service, product, or arrange a transaction for you.

Typically, the legal basis for using your data is to provide a service or arrange a transaction which you have requested. The legal basis will also include complying with our legal and regulatory obligations, e.g. under our Central Bank authorisations, interaction with the Data Protection Commission, Financial Services and Pensions Ombudsman, Revenue, Pensions Authority, when conducting Anti-Money Laundering checks, law enforcement agencies.

Where you have agreed or explicitly consented to the using of your data in a specific way, you may withdraw your consent at any time.

We may use your data if necessary to protect your "vital interests" in exceptional circumstances e.g. where we suspect a fraud may be in the course of perpetration.

Data may also be used for our legitimate interests (which you may object to) such as managing our business, providing service information, conducting marketing activities, training and quality assurance, and strategic planning.

5. How we use automated processing or "analytics"

We may analyse your information using automated means:

- to help us understand your needs and develop our relationship with you;
- to help us to offer you products and service information we believe will be of interest to you, providing that you have given us consent to use your data for this purpose;
- by using product providers IT systems and similar systems where you apply for a financial product e.g. to obtain underwriting terms from an insurer, analyse your investment risk profile, affordability testing.

The types and sources of the information we process by automated means about you are listed in Section 2 above.

We also use automated processing to assist in compliance with our legal obligations in connection with prevention of money laundering, fraud and terrorist financing.

6. Who we share your information with

When providing our services to you, we may share your information with:

- your authorised representatives;

- third parties with whom (i) we need to share your information to facilitate transactions or services you have requested, and (ii) you have agreed that we may share your information;
- product providers with which we propose to arrange business on your behalf;
- service providers who provide us with support services;
- statutory and regulatory bodies where we are legally obliged to do so;
- credit reference/rating agencies;
- pension fund administrators, where applicable;
- pensions scheme trustees or your employer in relation to the provision of pension benefits, where applicable.

7. How long we hold your data

How long we hold your data for is subject to legislation and regulatory rules we must follow, set by authorities such as the Central Bank of Ireland, Office of the Data Protection Commission, Financial Services and Pensions Ombudsman. The timescales may also depend on the type of financial or insurance, investment, or pension product provided to you. Our aim is to hold your data for no longer than is necessary and subject then to the timescales imposed by our legal obligations.

8. Implications of not providing your data

If you do not provide information we may not be able to:

- provide requested products or services to you;
- continue to provide and/or renew existing products or services;
- assess suitability; and
- where relevant, give you a recommendation for a financial product or service which you require.

9. Transfer of information outside the European Economic Area (EEA)

It is our aim to retain any information which we hold within the EEA. However, given the nature of our business relationships with certain product providers, such providers may have legitimate business reasons to transfer information outside the EEA. The product providers with which we arrange business on your behalf are obliged to comply with the provisions of the GDPR in relation to the transfer of data within or outside the EEA.

10. Data Subject Rights - How to exercise your rights

Under the GDPR you will have additional rights in relation to how your data is used, including the rights to:

- find out if we use your information, access your information and receive copies of your information;
- have inaccurate or incomplete information corrected and updated;
- object to particular use of your personal data for our legitimate business interests or direct marketing purposes;
- to have your information deleted or our use of your data restricted, in certain circumstances;
- not to be subject to solely automated decisions in certain circumstances, and where we make such automated decisions, a right to have a person review the decision;
- exercise the right to data portability i.e. obtain a transferable copy of certain information we hold or to transfer the data to another provider; and
- withdraw consent at any time for processing of your data, based on content of data.

If you wish to exercise any of your rights you can contact us at the address shown.

If we are unable to deal with your requests for data access fully within a calendar month we may extend this period by a further two calendar months and explain the reason why. If you make your request electronically, we will try to provide you with the relevant information electronically.

11. Complaints

If you are dissatisfied with our services or how we use your data, you have the right to complain to the Data Protection Commission, contact details as follows:

Address: Office of the Data Protection Commission, Canal House, Station House, Portlaoise, R32, AP23, Co. Laois.

Telephone: 076 1104800 or Lo Call Number 1890 252 231

Email: info@dataprotection.ie

12. Updates

We will update our Data Privacy Notice – Customer Summary and Website Privacy Notice from time to time. You may request copies of our current Notices at any time or refer to our website.

13. Our Contact Details

MortgageLine and Northwood Financial Planning

120 Upper Drumcondra Road

Drumcondra

Dublin 9

Telephone no: 01 707 9880

Email address: admin@mortgageline.ie

Effective Date: 25 May 2018