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# Michael Hannon trading as Michael Hannon Financial Services is regulated by The Central Bank of Ireland.

Privacy Statement (Effective from 25th May 2018)

#### **Introduction:**

Michael Hannon Financial Services 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 Michael Hannon Financial Services in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Michael Hannon
- Contact details of Tel: 091 799479.
- When we refer to 'we' it is Michael Hannon

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?

Michael Hannon trades as Michael Hannon Financial Services. We are located at Gortatleva, Claregalway, Co. Galway. We can be contacted on 091 799479 or by email <a href="michael@michaelhannonfs.ie">michael@michaelhannonfs.ie</a>. Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life, pensions, savings & Investment products. To provide you with relevant information, respond to your requests we sometimes request that you provide us with information about yourself.

#### What information we gather:

In general, you may visit our website without identifying yourself or revealing any personal information. Michael Hannon Financial Services collects domain information from your visit to customise and improve your experience on our website. This website may collect certain information from your visit, including the date and time of your access, the pages you have accessed, the name of the Internet Service Provider and the Internet Protocol (IP) address by which you are accessing the Internet, and the Internet address from which you linked to our site, if applicable. We use this information to better understand how our website is being used so that we can improve its performance. Some portions of this website may request that you give us information about yourself, from which we are able to identify you, such as your name, email or other address.

### Use of the information we gather:

When we collect information about you, we intend to tell you why we are asking for the information and what we intend to do with it. You will have the option of not providing the information, in which case you may still be able to access other parts of this website, although you may not be able to access certain services. In certain areas of our website, we may, where appropriate, enable you to 'opt in' to certain uses of your information e.g. personal data and direct marketing. Data will not be held for longer than is necessary. General client details will be held while you are a customer and will be retained for a period of 6 years after the relationship is terminated in line with CPC Legislation.

#### **Sharing information with third parties:**

In certain instances, we may make your information available to third parties with whom we have a relationship where that third party is providing services on our behalf. We will only provide those third parties with information that is necessary for them to perform the services and we take measures to protect your information. The information we collect may be used, stored and processed in the EU, UK or in any other country in which Michael Hannon Financial Services does business. By providing the information via the website, you are consenting to the transfer of the information outside of your country to any country (including countries which may not have adequate levels of protection). Michael Hannon Financial Services may disclose information it has collected about you on the website if required to do so by law or when necessary to protect the rights of Michael Hannon Financial Services or its employees.

#### Data security:

Michael Hannon Financial Services intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect online, including the use of encryption when collecting or transferring sensitive data such as credit card information. However, you should always take into consideration that the internet is an open forum and that data may flow across networks with little or no security measures, and therefore such information may be accessed by people other than those you intended to access it.

### How to update and/or amend the personal information you have provided:

You are entitled to know whether we hold information about you and, if we do (subject to certain limitations), to have access to that information and have it corrected if it is inaccurate or out of date. To exercise your Right of Access or to update your details under your Right of Rectification or Erasure please email your request to the contact address below with proof of identity.

#### **Business Relationships:**

This website contains links to other websites. Michael Hannon Financial Services is not responsible for the privacy practices or the content of such websites.

#### **Contacting Us:**

If you have any questions or comments about our privacy notice or practices, please contact us. Michael Hannon Financial Services may modify or update this privacy notice from time to time without prior notice. You can check the "Last Updated" date below to see when the notice was last changed. We encourage you to check this notice often so that you can continue be aware of how we are protecting your personal information. Your continued use of the website constitutes your consent to the contents of this privacy notice, as it may be modified from time to time. Email: michael@michaelhannonfs.ie

#### Why do Michael Hannon Financial Services need to collect and store personal data?

In order for us to provide you with Advice regarding Life/Serious Illness/Income Protection Cover we need to collect personal data from you in order to provide you with quotations comparing premiums and covers from our business partners i.e. Friends First, Irish Life, Zurich, New Ireland & Royal London. In any event, we 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. In terms of being contacted for marketing purposes Michael Hannon Financial Services would contact you for additional consent.

# How will Michael Hannon Financial Services use the personal data it collects about me?

Michael Hannon Financial Services 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. Michael Hannon Financial Services is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

#### Under what circumstances will Michael Hannon Financial Services contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

# Why we are processing your data? Our legal basis.

Our reason and purpose for processing your personal data is:

- We have your **consent**
- We need to process your data to complete the **performance of a contract**Where you, the data subject is a party.
- legal obligation that needs to meet
- protect the **vital interests of the data subject**, including the protection of rights and freedoms
- processing that is in the public interest
- necessary for the **legitimate interests of the data controller** or third party, unless the processing is overridden by the vital interests, including rights and freedoms
- national law

# **Data Subjects Rights:**

We, Michael Hannon Financial Services facilitate the data subject's rights in line with the 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 Michael Hannon Financial Services refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the clause below.

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. Michael Hannon Financial Services will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body, The Central Bank of Ireland. All Personal data will be destroyed/shredded 6 years after the termination of our clients' last policy in line with CPC regulations

#### **Withdraw Consent**

If we are relying on your consent to process your data you can withdraw this at any time – this does not affect the lawfulness of processing based on your consent before its withdrawal.

#### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed Michael Hannon Financial Services or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Michael Hannon Compliance Officer. Our Compliance Officer is Michael Hannon who is contactable on <a href="michael@michaelhannonfs.ie">michael@michaelhannonfs.ie</a>

### Failure to provide further information if needed

If we are collecting your data to fulfil a contract (life policy, pension plan or investment policy) and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

## If we have received your personal data from another source:

Michael Hannon Financial Services may occasionally collect your personal data from one of our Business partners after having received a signed Letter of Authority from the Data subject. In this case, Michael Hannon Financial Services is committed to protecting and respecting your privacy. It is the intention of this privacy statement ("Privacy Statement") to explain to you the information practices of Michael Hannon Financial Services in relation to the information we collect about you and other users.

#### **Cookies**

This website uses "cookies" technology. A cookie is a piece of text stored by the browser on your computer, at the request of our server. We may use cookies to deliver content specific to your interests and to save your personal preferences so that you do not have to re-enter them each time that you connect to our website. You are always free to decline our cookies, if your browser permits, or to ask your browser to indicate when a cookie is being sent. You can also delete cookie files from your computer at your discretion. Note that if you decline our cookies or ask for notification each time a cookie is being sent, this may restrict your ease of use of this website.

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