

Eolas Money Privacy Statement May 2018 (next review due June 2019).

Introduction:

Eolas Money 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 Eolas Money in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Eolas Money, Ard Gaoithe Commercial Centre, Cashel Road, Clonmel, Co Tipperary. 052 6129696. www.eolasmoney.ie
- When we refer to 'we' it is Eolas Money we are referring to.

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?

Eolas Money Management Limited, T/A Eolas Money, offers financial wellbeing and financial planning solutions to employers and individuals. Our employees are bound to act in your best interests and to help you with your financial requirements. Part of our business is to provide financial advice and arrange transactions on behalf of our clients in relation to life & pensions, mortgages, investments and some general insurance products. Our services include, but are not limited to:

- Income Advice
- Banking, Budgeting & Money Management Advice
- Savings & Investments Advice
- Protection Advice
- Debt Management Advice
- Loans, Borrowings and Mortgage Advice
- Retirement Planning Advice
- General Financial Wellbeing Advice including advice on any or all of the above

Contact us:

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact our Data Protection Officer / GDPR Owner, who can be contacted directly here:

Name: Jim Stapleton

Telephone:

052 6129696

Email: jim@eolasmoney.ie

Purpose for processing your data:

In order to best provide you with advice in relation to some or all of your personal finances, we require certain personal details and financial information from you which we will store on our CRM system and on our fact finds. This data may include:

- *Your Full Name, Address and Date of Birth, including verifiable evidence of same,*
- *Your Contact Number and Email address (es), so that we can contact you in order to provide the services you require,*
- *The number of dependents you have and their names and ages, so that we can advise you in relation to educational funding, the establishment of trusts where required,*
- *Your employment status, so that we understand your current income and likely future income,*
- *Your Taxation history and pps number, so that we can verify your identity and engage with Revenue on your behalf where you require Taxation services,*
- *Your Banking history and details of any accounts held by you, so that we can advise you in relation to the structure you employ to manage your Banking,*
- *Details of your savings and investments, so that we can advise in relation to those,*
- *Details in relation to your personal protection, such as Health, Life, Illness and Income Protection policies or benefits held by you, so that we can advise in relation to the suitability or otherwise of those arrangements,*
- *Details in relation to your Borrowings, including your Mortgage, so that we can advise you in relation to same,*
- *Details of all your Retirement Planning arrangements, so that we can provide informed advice about what the financial picture looks like for you after retirement,*
- *Details as to whether or not you have made a will, so that we can advise you in relation to Inheritance Tax and other financial implications caused by your death.*

Why we are processing your data? Our legal basis:

Our lawful reason for processing your data under the GDPR is that this is necessary in order to provide you with advice about your personal finances in keeping with our services as outlined above, including the potential arrangement of a contract of insurance or other financial product as instructed by you.

In any event, Eolas Money 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 Eolas Money use the personal data it collects about me?

Eolas Money 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.

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.

Special Categories of personal data:

If we collect any special categories of personal data (e.g. health, religious beliefs, racial or ethnic origin) – we will obtain your explicit consent. Such data, particularly health and/or racial data, may be required when contracting or attempting to contract certain insurance policies.

Who are we sharing your data with?

We will share this data with Applied Wealthtrack, who supply our Customer Relationship Management (CRM) system, and Voyant, who supply our financial cashflow planning tool. In addition, we will also share some of this data where required with the Revenue Commissioners, in the case of Taxation Services, and with the financial services providers with whom we have agencies where you wish to us to enquire about or transact business for you, such as Life Assurance products, Savings and Investments, Pensions and Mortgages.

We may pass your personal data on to third-party service providers contracted to Eolas Money 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 Eolas Money 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:

- Applied Wealthtrack
- Revenue Commissioners
- The various financial institutions with whom we have agency agreements (list available on request)

We have issued all our third-party processors with a Data Processor checklist asking them GDPR specific questions.

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:

Eolas Money 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 rights set out below. Where required, 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.

- **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 Organisation Name refuses your request under rights of access, we will provide you with a reason as to why.

Retention of your personal data:

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Eolas Money will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body and our internal governance.

Complaints:

In the event that you wish to make a complaint about how your personal data is being processed by Eolas Money) or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Eolas Money's GDPR owner, Jim Stapleton.

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.

Profiling – automatic decision making:

We use a risk profiling tool to help us provide advice in relation to your Savings, Investments and Pensions. This is designed to establish a customer's attitude to investment risk (relates to pensions and investments) and calculates a customer's attitude to various levels of risk having answered a series of questions.

Privacy Policy Statement Changes:

Eolas Money 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 are aware of any changes. By using our services you agree to this privacy policy.