

# Privacy Notice

## Who we are:

Sylvia Campion, Micheál Kelly and Patrick Feely t/a Advocate Financial Services (hereinafter referred to as Advocate) is a financial services brokerage, providing advice, services and a range of products in the areas of financial planning, family and business protection, savings, investments, pensions and home insurance. The firm is owned and managed by Sylvia Campion, Micheál Kelly and Patrick Feely. Our business is located at 44 College Square, College Road, Kilkenny. R95D6F3. Our phone number is 056 775 6425 and our e-mail is [info@advocatefinancial.ie](mailto:info@advocatefinancial.ie). Our website address is [www.advocatefinancial.ie](http://www.advocatefinancial.ie) and [www.incomeprotection-ireland.ie](http://www.incomeprotection-ireland.ie)

## Privacy Notice:

Advocate is committed to respecting and protecting your privacy and would like you to feel safe when you give us your personal details. We will always clearly identify ourselves in correspondence and on our website.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life, pensions, investments, savings and home insurance products.

In order to provide you with relevant information, respond to your enquiries and requests for products and/or services we sometimes request that you provide us with information about yourself. This Privacy Notice will inform you of the information we gather and how it is used.

We collect and process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR) and will endeavour to keep your information accurate and up to date, and not keep it longer than is necessary. We will only collect the personal information needed to perform our duties. We collect and process the following personal data: Personal details – name, address (and proof of address), other contact details (eg. email and telephone details), gender, marital status, family details, date and place of birth, employer, job title, details of financial products including life policies, pensions, mortgages, savings, investments and household insurance. Details of income and expenditure, assets and liabilities, insurance claims, and mortgage arrears. Identification details – identification numbers issued by government bodies or agencies, utility bills, driver's licence or passport details.

We may contact you where by legitimate interest has been identified or if you have consented to receiving marketing of our products and services and other companies' products and services that may be of interest to you.

Advocate maintains the same privacy practices with respect to data that is collected off-line and on-line, and this notice also covers both those methods of data collection and use. Advocate complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data.

You may visit our website without identifying yourself or revealing any personal information. Advocate 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.

For the purposes of the GDPR the data controller is:

- Sylvia Campion
- Contact details are [info@advocatefinancial.ie](mailto:info@advocatefinancial.ie)

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.

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. Some of the ways in which we may collect information from you are:

## **Use of the information we gather/Purpose why we are processing your information:**

Generally, we may collect your data for one or more of five reasons based on below:

- 1) To respond to your request(s) for advice or products or queries in relation to same.
- 2) Reviewing your financial, insurance or other products as is prudent or required.
- 3) To recommend products that protect your lifestyle e.g. protecting your family (including your mortgage) in the event of death.
- 4) Planning your financial future eg. retirement funding, savings and investment options.
- 5) Residential Property Insurance – enquiry, advice or placing insurance cover.

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, credit card transactions will be held for the duration of the transaction and general client details will be held while you are a customer. Our Regulator, The Central Bank of Ireland, requires that where clients have products with us that we maintain their data for six years after the last product expires or is cancelled.

The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to verify your identity, send you information or contact you in relation to an Advocate product or service that you are using or that we believe may be of interest to you after you have chosen to ‘opt in’.

## **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 obtain your explicit consent

## **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 to clients. You can view the list of product providers we hold agencies with via the Central Banks website. 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, United States, Switzerland or in any other country in which Advocate does business. We will always try to process data within the EU and UK.

Advocate 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 Advocate or its employees.

## **Data Subjects Rights:**

We 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** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** if 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.

### **Data security:**

Advocate's 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.

### **Complaints:**

In the event that you wish to make a complaint about how your personal data is being processed by Advocate or how your complaint has been handled, you have the right to lodge a complaint directly with the data supervisory authority and /or our Data Protection Officer, Sylvia Campion on 056 775 6425 or by e-mail to [info@advocatefinancial.ie](mailto:info@advocatefinancial.ie)

Link below to the complaints section of the Data Commissioner website:

<https://www.dataprotection.ie/docs/Making-a-Complaint-to-the-Data-Protection-Commissioner/r/18.htm>

Or email Data Protection Commissioner to [info@dataprotection.ie](mailto:info@dataprotection.ie)

### **Failure to provide further information:**

If we are collecting your data for a contract (e.g. Life policy or motor insurance policy) 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:**

Profiling:

Financial advisors using profiling in their business. The main categories are:

- a) Profiling for marketing purposes.
- b) Establishing affordability and providing quotations for financial services products.

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.

a) 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.

b) Establishing affordability and providing quotations for financial services products.

### **Business Relationships:**

This website contains links to other websites. Advocate is not responsible for the privacy practices or the content of such websites. Advocate uses pixels, transparent GIF files and other methods to help manage online advertising.

### **Contacting Us:**

If you have any questions or comments about our privacy notice or practices, please contact us. Advocate may modify or update this privacy notice from time to time at any 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: [info@advocatefinancial.ie](mailto:info@advocatefinancial.ie)

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