

Privacy Notice/Statement

Introduction

Killeen Financial Services Ltd t/a Cleere Life & Pensions 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 Cleere Life & Pensions in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Gearoid Cleere
- Contact details of (056) 7721854
- When we refer to 'we' it is Cleere Life & Pensions

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?

- Cleere Life & Pensions provide financial advice to Sole Traders, Company Directors and Individuals looking for financial advice. Our team of Qualified Financial Advisors provide our clients with the tools they need to set their objectives and reach their financial goals. Cleere Life & Pensions have agencies with the top Life Companies in Ireland, allowing us to guide our clients through the application process.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Gearoid Cleere
- gearoid@cleerelife.ie
- (056) 7721854

Purpose for processing your data

We collect your personal details in order to provide the highest standard of service to you. We take great care with the information provided, taking steps to keep it secure and to ensure it is used only for legitimate purposes. The information you have provided will be treated as confidential and will be retained by Cleere Life & Pensions in electronic format for the purposes of providing Financial Services.

Why we are processing your data? Our legal basis.

In order for us to provide you with Life Cover/Pension/Investment service) Cleere Life & Pensions need to collect personal data to provide you with appropriate financial advice and/or process a financial product application where applicable, where you, the data subject, is a party. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – Cleere Life & Pensions needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract.

In any event, Cleere Life & Pensions 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 Cleere Life & Pensions use the personal data it collects about me?

Cleere Life & Pensions 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 endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary.

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 ensure the below

- we will obtain your explicit consent

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Cleere Life & Pensions 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 Cleere Life & Pensions 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.

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:

Cleere Life & Pensions 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:** in the event that 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.

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. Cleere Life & Pensions will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (xxx) and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Cleere Life & Pensions or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Organisation Name's data protection representatives Data Protection Officer / GDPR Owner

Failure to provide further information

If we are collecting your data for a contract x 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

Cleere Life & Pensions may from time to time carry out automatic decision making (for example Profiling – automatic decision making

Profiling;

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

- a) Risk profiling.
- b) Profiling for marketing purposes.
- c) Establishing affordability and providing quotations for financial service products

a) Risk Profiling

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.

b) 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.

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

You will be notified in advance of any instance of this any have the right to object to this at any time.

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.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (056) 7721854 or email gearoid@cleerelife.ie

Privacy policy statement changes

Cleere Life & Pensions 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're aware of any changes. By using our services you agree to this privacy policy.

This privacy policy was last reviewed in May 2018

Killeen Financial Services Ltd t/a Cleere Life & Pensions is regulated by the Central Bank of Ireland
