

# Privacy Notice

## Introduction

Roger Carragher 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 Roger Carragher Financial Services in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Roger Carragher
- Contact details of 0879756496
- When we refer to 'we' it is Roger Carragher Financial Services

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?

- *We are a Financial Services Broker, we provide advice in relation to protection, pensions, savings and investments. The products we advise on are life assurance, mortgage protection, specified illness cover, income protection, personal pensions, prsa's, executive pensions, savings and investments.*

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

- Roger Carragher
- info@carragher.financial
- 0879756496

## Purpose for processing your data

*Roger Carragher Financial Services* needs to gather and use certain information about individuals.

These can include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards thus complying with the legislation.

This data protection policy ensures Roger Carragher Financial Services:

- Comply with Data Protection Legislation and follow Good Practice;

- Protect the Rights of Employees, Customers and Partners;
- Is Transparent in terms of How It Stores and Processes Individuals' Data;
- Protects itself from the Risks associated with a Data Breach.

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

In order to provide you with our services, it is necessary for us to collect and process your personal data. We are required, therefore, to inform you of the legal bases for processing your personal data. One such legal basis is that the processing is necessary for the performance of the advisory services contract (and any other contract) that we commit to delivering to you from time to time. Another legal basis is that some processing is necessary for the purposes of the legitimate interest that we have, as a firm that is authorised and regulated by the Central Bank of Ireland, in the proper administration and correct operation of our firm. There may also be circumstances where the legal basis for processing your personal data is consent (where we have sought it and it has been provided to us), in which case that consent may be withdrawn at any time.

In any event, Roger Carragher Financial Services 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 Roger Carragher Financial Services use the personal data it collects about me?**

Roger Carragher 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 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 Roger Carragher Financial Services 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 Roger Carragher Financial Services 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 will share data with leadpro.ie in relation to their role as pension lead provider. The only data that will be shared will be if the client proceeded with the service and if so when the service came to an end. No other data will be shared.

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:**

Roger Carragher Financial Services 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**
- **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. Roger Carragher Financial Services will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank of Ireland) and our internal governance.

#### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Roger Carragher Financial Services or how your complaint has been handled, you have the right to lodge a complaint with the Organisation Name's data protection representatives Data Protection Officer / GDPR Owner.

You may also lodge a complaint with the Data Protection Commission in Ireland, whose details are:

Data Protection Commission  
Canal House,  
Station Road,  
Portarlinton,  
Co. Laois, R32 AP23  
Phone: + 353 57 868 4800 / + 353 761 104 800  
Fax: + 353 57 868 4757  
Web: [www.dataprotection.ie](http://www.dataprotection.ie)  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

### **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**

Profiling – automatic decision making

Profiling;

Financial and mortgage 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 services and mortgage product

#### 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.

#### c) Establishing affordability and providing quotations for financial services products.

### **Contact Us**

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 0879756496 or [info@carragher.financial](mailto:info@carragher.financial)

### **Privacy policy statement changes**

Roger Carragher Financial Services 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 on 12th March 2024

*Source: Atlantic Compliance Ltd*

*Atlantic Compliance Ltd are experienced data protection practitioners and all document templates are provided as general guidance.*

*Users of these documents should consult their own legal advisers for legal advice specific to their own circumstances and Atlantic Compliance Ltd accepts no liability of any sort arising from the use of these templates.*

---