

Data Privacy Statement

Introduction

Rightone Ltd 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 the Rightone Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

Rightone Ltd

13D Main street, Ongar Village, Dublin 15

When we refer to 'we' and 'the Company' it is Rightone Ltd

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 regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Communities (Insurance Mediation) Regulations, 2005; and as a Mortgage Credit Intermediary under the European Union (Consumer Mortgage Credit Agreements) Regulations 2016. Copies of our regulatory authorisations are available on request. The Central Bank of Ireland holds registers of regulated firms. You may contact the Central Bank of Ireland on 1890 777 777 or alternatively visit their website at www.centralbank.ie to verify our credentials. Registered in Ireland with Central Bank no. C93262.

Our GDPR Owner and data protection representatives can be contacted directly here:

Rightone Ltd – Compliance Manager

admin@rightone.ie

01 44 100 22

Purpose for processing your data

We will be processing your data in purpose to enable us to:

- provide you with services requested by you (Protection policy review, New policies, Pension advice, Mortgage advice etc.)
- helping and assisting with any claims that may arise during the policy term
- providing you with ongoing financial advice in relation of financial products that you may already hold
- to help us maintain our business records, developing, improving our services.
- and to provide you information about our products services.

Why we are processing your data? Our legal basis.

In order for us to provide you with life, pensions, general insurance contracts or mortgage services We need to collect personal data for underwriting and suitability assessment of these products and services. Our reason (lawful reason) for processing your data under the GDPR is:

- Legal basis - We needs to process your data as this is necessary in relation to a contract of insurance, pension or mortgage 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 of insurance or mortgage.
- We have an appropriate business need to process your personal information and such business need does not cause harm to you. We will rely on this for activities such as maintaining our business records, developing, improving our services, and providing information about our products and services to you
- You have provided your consent to our use of your personal information, including special category data on the fact find completed at the initial consultation.

How will the Company use the personal data it collects about me?

We 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.

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, either verbal or written.

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted by the Company in the course of dealing with you and providing the products you require. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil 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 the Company 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:

- April Ireland
- Aviva Life
- Blue Insurance
- Brokers Ireland (for mortgages)
- Irish Life
- New Ireland
- Pulse Insurance
- Royal London
- Zurich Life

We may also disclose your personal information to other third parties where: we are required or permitted to do so by law or by regulatory bodies such as where there is a court order or statutory obligation to :

- Central Bank,
- Data Protection Commissioner
- The Financial Services and Pension Ombudsman.

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:

The Company 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 it was obtained. The Company will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body - Data Protection Commissioner and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by the Company or how your complaint has been handled, you have the right to lodge a complaint directly with The Data Protection Commissioner and GDPR owner as stated above.

Failure to provide further information

If we are collecting your data for a purpose of arranging the contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

Profiling

As an financial and mortgage advisor We are using profiling. The main categories are:

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

c) Establishing affordability and providing quotations for financial services and mortgage products

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 01 44 100 22 or admin@rightone.ie

Privacy policy statement changes

The Company 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 24th of May 2018