

# Data Privacy Notice



**Finance**  
SOLUTIONS

Part of **HOWDEN**

# Data Privacy Notice

***Privacy Notice for Kegra Limited t/a Finance Solutions, Best Life Cover,  
6 Lower Main Street, Lucan, Co Dublin, Telephone (01) 610 8884 June 2023***

This is the privacy notice of **Kegra Limited t/a Finance Solutions, Best Life Cover** and tells you what we use your personal information for and explains your rights around how we use it. Please read this Privacy Notice to understand how and why we use your personal information. If you give us personal information about someone else, please make sure you have their permission and make them aware of this Privacy Notice, as it also applies to them.

Kegra Limited t/a Finance Solutions, Best Life Cover complies with the requirements of the General Data Protection Regulation 2016 and the Irish Data Protection Act 2018. Should you have any queries, please contact our Data Protection Contact, Ken Murray by email at [info@financesolutions.ie](mailto:info@financesolutions.ie) (quoting data protection in the email title) by telephone at (01) 610 8884 or at our office address noted above.

## Collection and use of Personal Data

We are a mortgage, insurance and investment intermediary and are regulated by the Central Bank of Ireland. Through the lenders or other undertakings, we hold agencies with, we provide advice on mortgage products. We also offer a range of products and services including life assurance, pensions, and investments.

We need to collect and use your personal information to provide the services you have asked us to provide, whether this be arranging a mortgage or providing advice and/or arranging protection, pensions, savings, and investments.

The information we collect includes, but is not limited to, your name, date of birth, contact phone number, address, email address and bank account details. Depending on the service or product we may also collect health, employment, pension, salary, and tax information.

Information about your health is classified as sensitive personal information and we require your explicit consent to receive, hold and process this information. We restrict access to, and use of, any sensitive personal information.

Personal information we collect is held and used to.

- + Recommend products that are suitable for you
- + Process applications including mortgage applications
- + Set up and issue insurance and investment products;
- + Provide you with information about products we have advised on or arranged on your behalf.
- + Provide customer care and service; and contact you to inform you of any relevant actions you may need to take
- + Provide you with details of other services we provide that may be of interest to you

## **Required By Law:**

We use your personal information to comply with law and regulations such as.

- + Reporting to regulators;
- + Keeping proper books and records; and

We carry out internal reporting, quality checking, compliance controls and audits to help meet these obligations.

We must collect certain personal information to comply with Anti-Money Laundering and Counter Terrorist Financing requirements. This includes collecting up to date proof of identification and address. Where needed we carry out searches of publicly available information.

## **Legitimate Interest**

We use your personal information for our legitimate interests as shown below. This doesn't affect your privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions using the above contact details of this Privacy Notice.

### **Statistical Analysis**

- + We combine personal information of our customers for analysis to help us understand our customers and develop better services for you.
- + We use summary information to help promote our services and products from our product providers.

## **Consent and the right to withdraw consent**

We require your consent to collect and use personal information classed as sensitive or for certain uses of your personal information, including contacting you about offers and services from our company other than those we have contracted to provide. We will only send you direct marketing content where we have your consent. You are given the choice to provide consent, or not. When we request your consent, we will explain what we need it for and how you can change your mind in the future.

If we process your personal information based on you having provided consent, you have the right to withdraw that consent at any time. The opt-out methods will depend on how the consent was collected and will be explained when you give us your consent, e.g. you can change your mind using the opt-out link in any direct marketing emails sent to you. You will also be able to withdraw consent by contacting us directly.

## How and where do we get your Personal Information

You provide us with your personal information directly when you contact us, complete our forms, speak with us, or visit our website and social media accounts. We may also receive personal information from others acting on your behalf such as solicitors, employers, or regulators (where relevant).

We also create new personal information about you based on information you have given us and through your interactions with us such as noting your online preferences.

## Who do we share your Personal Information with?

**Mortgage providers:** We provide personal data to mortgage providers to enable them to assess mortgage applications. A list of the mortgage providers we have agreements with is available on request.

**Insurance companies:** We provide personal data to insurance companies we have agencies with to allow them to process applications to take out insurance policies including life assurance, income protection and insurance-based investment products. A list of the insurers we have agencies with is available on request.

**Investment Service Providers:** We pass personal information to investment service providers where you want to access these services through your plan e.g., Stockbroker or Online Trading Platform.

**Government, Statutory and Regulatory Bodies:** State regulators and authorities such as the Data Protection Commission, the Revenue Commissioners, the Central Bank of Ireland, and the Financial Services & Pensions Ombudsman; Law Enforcement Agencies such as An Garda Síochána and the Criminal Assets Bureau. Industry bodies such as the Motor Insurers Bureau of Ireland and the Personal Injuries Assessment Board.

**Service Providers:** We may need to pass and / or allow access to the system containing your personal data to third-party service providers contracted by us to provide our IT system support and maintenance, our offsite data backup, our telephone communications; Compliance / Business Development / systems and marketing advice and statutory audit services. Any such service providers are obliged to keep your details securely, and to use them only to fulfil the service that they provide to us. When they no longer need your data to fulfil this service, they will dispose of the details in line with our data protection policy.

## Transferring personal information outside of the EU

Your personal data is processed and stored within the EU or the UK which has equivalent data protection requirements to those applying in the EU.

## How long do we keep your personal information for?

We keep and use your personal information for as long as you have a relationship with us. We also hold it after this where we need to for complaints handling, for system back-ups needed for disaster recovery and for as long as we have to under regulations. We will let you know how long we keep personal information for when you avail of a single or specific service such as a quote or call-back.

## What are your rights?

While we are in possession of or processing your personal data, you, the data subject, have the following rights:

**Right to Access** - You have the right to know what personal information we hold about you and to receive a copy of your personal information. We must tell you:

- + why we hold it;
- + who we pass it to, including whether we transfer it outside the EU;
- + how long we keep it for;
- + where we got it from; and
- + if we carried out any automated-decisions, and if so, the logic behind it and what it means for you.

This right does not allow you to access personal information about anyone else. To access your personal information please write to us using the contact details in this Privacy Notice. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information.

**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, you have a right to restrict the processing of personal information we hold about you.

**Right of portability** - You have the right to have the data we hold about you transferred to another organisation in a format specified by you e.g., electronically or in a particular file format.

**Right to object** - You have the right to object to certain types of processing such as direct marketing and to object to automated processing, including profiling.

**Right to judicial review** - If we refuse your request under rights of access, we will provide you with a reason as to why, if you are not satisfied with this reason you have a right to seek a judicial review.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us or how a complaint to us has been handled, you have the right to lodge a complaint directly with the supervisory authority and/or our Data Protection Contact, Ken Murray.

The contact details of the Data Protection Commission are:

Postal address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28

Telephone: (01) 7650100 / 1800437 737

Online: Data Protection Commission [www.dataprotection.ie](http://www.dataprotection.ie)