



MM FINANCIAL PLANNING
LIMITED

Privacy Statement

MM Financial Planning 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 MM Financial Planning Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is;

MM Financial Planning Ltd
Barrack Street
Cappoquin
Co Waterford

You can email us at mark@masonfinancial.ie

In this document “we”, “our”, or “us” refer to MM Financial Planning 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?

MM Financial Planning Ltd acts as a Financial Broker and is regulated by the Central Bank of Ireland as an Insurance & Mortgage Intermediary. Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Life Assurance, Investments, Mortgages, Protection Products, Pensions & PRSA's.

Accuracy of your personal data

Please keep us up to date with any changes to your personal data, this allows us to ensure that your personal data is kept accurate and up to date.

Purpose for processing your data

Personal data refers to any information relating to an identified or identifiable natural person (Data Subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular in reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Mark Mason Q.F.A.

Barrack Street, Cappoquin, Co. Waterford M. 087 2756400 E. mark@masonfinancial.ie

www.masonfinancial.ie

MM Financial Planning Limited is regulated by the Central Bank of Ireland | Company Reg. No. 783344





MM FINANCIAL PLANNING LIMITED

In order for us to provide a service to you, we require certain information about you that is classed as personal information. The following are the type of services we provide that require us to process personal data;

- Pension Services
- Financial Services
- Investment Services
- Life cover Services
- Mortgages
- Income Protection Services

The type of personal data that we may process about you will depend on the service that you require from us. The following is an example of the type of personal data we process for different services. This list is non exhaustive.

Contact information – name, address, phone, email
Identification information – PPS number, date of birth
Employment details – occupation etc
Financial details – bank details, tax, income
Health information – illnesses, disorders

Should you apply to work at MM Financial Planning Ltd, we collect personal information from you such as;

- Name
- Contact Details
- CV's education and employment history

How we collect your data

How we get the information and why we have it

Direct interactions

You may provide us with your personal information when you;

- Fill in a fact find via Best Advice (a financial platform we use)
- Fill in a paper-based fact find
- Fill in the query form on our website
- Correspond with us via email, phone or otherwise
- Meet with us on a one-to-one and provide us with your business card, for example.
- Send your cv to us in order to apply for work

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Most of the personal information we process is provided to us directly by you, however we may also receive personal information indirectly, from the following sources in the following scenarios:

Facebook, LinkedIn, Twitter, Google

From visiting these pages, or interacting with us, you are passing information on to us via the above platforms, these are known as cookies. This type of information is technical data about your computer equipment, browsing actions and preferences.

We also may have access to your publicly available details from these sources.

Why are we processing your data? Our legal basis.

In order for us to provide our services to you, MM Financial Planning Ltd need to collect personal data for:

We are required to determine the legal basis for which we process different categories of your personal information, and to notify you of the basis for each category.

Most of the personal information we process is provided to us directly by you for one of the following reasons:

Information we process because we have a contractual obligation with you.

MM Financial Planning Ltd needs to process your data as this is necessary in relation to a contract of insurance to which you have entered into or because you have asked us for something to be done so that you can be entered into a contract.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- Setting up your account as a client with us
- Liaising with you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website
- Processing and ensuring payment of invoices

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

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Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We may share this information with third parties in order to process the purchasing transaction of our services. These companies must also adhere to the same data protection legislation.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do so after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would consider it reasonable to do so

For example, we may process your data on this basis for the purpose of;

- necessary administration of our business – for example, creating your client account
- responding to unsolicited communication from you which we believe you would expect a response
- Processing payments and invoices
- preparing for a job interview with you

Information we process because we have your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide with more information about our business, including job opportunities, our products and services, you provide your consent to us to process information that may be personal information

Wherever possible, we aim to obtain your explicit consent to process this information, for example by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by email to which you would reasonably expect us to reply

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You may also consent to have your data used in order to receive information on a new product offering which we think may suit you.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at mark@masonfinancial.ie

Information we process because we have a legal obligation

We may be required to give information to legal and regulatory authorities if they so request and subject to the correct authorisation

What we do with the information

- verify your identity for security purposes
- sell products to you
- provide you with our services
- keep our website safe and secure

We may share your personal data with selected business associates, suppliers and contractors to provide you with our services. For example, these business partners may include our web hosting provider and our IT Cloud service providers.

In the event that we buy or sell any business or assets, it may be necessary to disclose personal data to the prospective buyer or seller

How will MM Financial Planning Ltd use the personal data it collects about me?

MM Financial Planning Ltd 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 necessary. For information on the time periods your data is held for please contact us on mark@masonfinancial.ie

Special Categories of personal data

If we collect any special categories of personal data (eg. Health, political opinions, trade union membership – financial information is not classified as special categories of personal data) we will ensure we receive your explicit consent.

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Who we are sharing your data with

We may pass your personal data on to third party service providers contracted to Mason Mortgage & Financial Services in the course of dealing with you in order to provide our services to you. 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 General Data Protection Regulation.

If we wish to pass on your sensitive personal data to 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 we pass your personal data to are:

Insurance companies which we obtain quotes from in order to provide you with services you request (pension providers, investment firms, insurance firms)

Web hosting provider,

IT Cloud Service Providers

Selected business providers, suppliers and contractors to provide you with our services

We have issued all our third party processors with a Data Processor agreement and/or checklist to ensure they are GDPR compliant.

Data Transfers

In some circumstances it may be necessary for us to transfer your data outside the European Economic Area (EEA). We will only transfer data to receivers that are in countries approved by the EU Commission, or where there are the appropriate safeguards in place to protect your personal data. For further information on these appropriate safeguards, please email mark@masonfinancial.ie

Profiling

MM Financial Planning Ltd may, in certain circumstances use profiling in our business. The main categories are

- Risk profiling
 - To establish a customer's attitude to investment risk in relation to pensions and investments, advisors have automated calculators which calculate customers attitude to various levels of risk having answered a series of questions.
- Profiling for marketing purposes
 - When we seek to contact you about suitable services, we may run automated queries on our computerised database to establish the suitability of the proposed products or services to your needs.

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- Establishing affordability and providing quotations for financial services

Your data protection rights

Under data protection law, you have rights including:

- Your right of access – You have the right to ask us for copies of your personal information
- Your right to rectification – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances
- Your right to object – You have the right to ask us to stop processing your personal data for profiling or direct marketing
- Your right to restriction of processing – You have the right to object to the processing of your personal data in certain circumstances
- Your right to data portability – You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Exemptions may apply if the information requested is considered excessive or repetitive.

Please contact us at mark@masonfinancial.ie if you wish to make a request.

How to complain

You can also complain to the Data Protection Commission if you are unhappy with how we have used your data.

The Data Protection Commission address:
21 Fitzwilliam Square South
Dublin 2
D02 RD28

Privacy Policy statement changes

MM Financial Planning Ltd may change this 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 are aware of any changes. By using our services, you agree to this privacy policy.

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