



Privacy Notice

Introduction

PROactive Finance 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 PROactive Finance in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- PROactive Finance
- Contact details of PROactive Finance: 068 31777 or info@proactivefinance.ie
- When we refer to 'we' it is PROactive Finance

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?

PROactive Finance Ltd. is a financial services company based in Abbeyfeale, Co. Limerick offering honest, professional advice on Life Cover, Pensions, Investments, Private Health Insurance and more.

We are regulated by the Central Bank of Ireland and are members of Brokers Ireland and the Life Insurance Association (LIA).

Our GDPR Owner can be contacted directly here:

- Name: Gerard Ward
- Email address: gerard@proactivefinance.ie
- Phone number: 068 31777

Purpose for processing your data

PROactive Finance will ensure to:

- 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.

PROactive Finance will ensure that data is:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purpose;
- Adequate, relevant and limited to what is necessary;
- Accurate and where necessary, kept up to date;
- Retained only for as long as necessary;
- Processed in an appropriate manner to maintain security.

Why we are processing your data? Our legal basis.

In order for us to provide you with a financial service PROactive Finance needs to collect personal data for this purpose. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** - PROactive Finance 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, PROactive Finance 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 PROactive Finance use the personal data it collects about me?

PROactive Finance 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 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 PROactive Finance 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 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 PROactive Finance 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.

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:

PROactive Finance facilitates you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

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.

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. PROactive Finance will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (PROactive Finance) and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by PROactive Finance 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 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

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.

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 068 31777 or email info@proactivefinance.ie.

Privacy policy statement changes

PROactive Finance 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
