

## Data Privacy Statement

### Introduction:



Howth Financial  
Services Ltd.

Howth Financial Services Ltd. committed to respecting and protecting your privacy and would like you to feel safe when you give us your personal details. We will always clearly identify ourselves in our communications to you.

This Data Privacy Statement will inform you of the information we gather and how it is used. Howth Financial Services Ltd. only collects off-line data.

Howth Financial Services Ltd. complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data. These rules apply regardless of whether data is stored on paper or on other materials. To comply with the law personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

It is important that you read this privacy policy together with any other privacy policy or notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

For the purposes of the GDPR the data controller is:

- Miriam Leonard —
- Contact details: [dataprotecion@howthfinancial.ie](mailto:dataprotecion@howthfinancial.ie)
- Postal address: Howth Financial Services Ltd., Howth House, Harbour Road, Howth, Co. Dublin. D13 XK75.
- When we refer to 'we' it is Howth Financial Services Ltd.

If you have any questions about this Data Privacy Statement, including any request to exercise your legal rights, please contact us using the details set out above.

The principal business of Howth Financial Services Ltd. is to provide advice and arrange transactions on behalf of clients in relation to life assurance and pension products, mortgages and investment products. To provide you with the relevant service and respond to your requests we will sometimes request that you provide us with information about yourself.

### Purpose of processing your data:

Personal data can only be collected for specific, explicit and legitimate purposes.

We will only use your data for the purpose of providing our service to you i.e. to assess your needs and product suitability and to secure the recommended products for you. This will involve sharing your data with third parties. See 'who are we sharing your data with?' below.

We will use your data in the course of the contract we secured on your behalf to administer the contract in accordance with our legitimate business interest and in your best interests.

### Legal basis for processing your data:

The legal basis for processing your personal information is typically one of the following:



- Performance of a contract. It is necessary for us to process your personal information to perform a contract with you, or for us to take steps on your instruction prior to entering into a contract with you.
- Legal obligations. It is necessary for us to process your personal information to comply with the law.
- Legitimate interests. It is in our legitimate interests to use our personal information to provide and promote our services and to protect our business.
- Consent. You have consented to us using your personal information. You can withdraw this consent at any time by sending your signed instruction to [dataprotection@howthfinancial.ie](mailto:dataprotection@howthfinancial.ie)

In any event, Howth Financial Services Ltd. is 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 Howth Financial Services Ltd. use the personal data it collects about me?**

Howth Financial Services 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. With regard to the length of time we hold your information this will be in line with our Data Retention Policy – see 'Retention of your Personal Data' below.

#### **Special Categories of personal data**

If we collect any special categories of personal data e.g. health, religious beliefs, racial, ethnic origin, we will obtain your explicit consent. Please note, for the purposes to GDPR financial information is not classified as a special category of personal data.

#### **Who are we sharing your data with?**

In the course of providing our service to you we will pass your personal data on to third-party service providers contracted to Howth Financial Services Ltd. We will only provide those third parties with information that is necessary for them to perform the services required. 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.

Special Categories of personal data as outlined above will only be passed on to a third party once we have obtained your explicit consent, unless we are legally required to do otherwise.

The third parties that we may pass your personal data to are:

- Mortgage providers with whom we have an agency agreement
- Life assurance, pension (and associated products) providers with whom we have an agency agreement
- Deposit and investment product providers with whom we have an agency agreement
- Parties with whom you have a formal business relationship e.g. your Solicitor, your Accountant, other brokers with whom you have a business relationship with regard to securing related products and or services
- other companies who act as service providers to Howth Financial Services Ltd. e.g. data storage providers (including the use of cloud providers), document destruction, IT services and security
- regulatory authorities such as The Central Bank of Ireland, The Financial Services Ombudsman, the office of The Data Protection Commissioner
- when required by law or legal process for the administration of justice for investigations by legal enforcement or regulatory bodies or by order of a valid order by a court or law enforcement agency



### Data Subjects Rights:

A data subject is an individual who shares personal data.

Howth Financial Services Ltd. facilitate your rights in line with our data protection policy and our 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. Please note Howth Financial Services Ltd. does not accept ported data.
- **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 Howth Financial Services Ltd. 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:

Howth Financial Services Ltd. will process personal data in accordance with our retention schedule. This retention schedule has been governed by our internal governance taking into account recommendations by our regulatory bodies i.e. the Central Bank of Ireland, the Office of the Financial Services Ombudsman and the Office of the Data Protection Commissioner. These periods of time are subject to legal and regulatory requirements or to enable us to manage our business. Should you require a copy of our Data Retention Policy please request from [dataprotection@howthfinancial.ie](mailto:dataprotection@howthfinancial.ie)

### Complaints:

In the event that you wish to make a complaint about how your personal data is being processed by Howth Financial Services Ltd. or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Howth Financial Services Ltd.'s Data Protection Officer.

### 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 the details will be incorrect.



**Profiling**

In the course of providing our service to you profiling may be used in the following ways:

- establishing affordability and providing quotations for financial services products and mortgage products
- establishing a customer's attitude to investment risk (relates to pensions and investments). We would use automated calculators to calculate your attitude to various levels of risk having answered a series of questions.

**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 8396770 or email us [dataprotection@howthfinancial.ie](mailto:dataprotection@howthfinancial.ie)

**Privacy policy statement changes**

Howth Financial Services Ltd. may change this [privacy policy](#) from time to time. When such a change is made, we will post a revised version on [www.howthfinancial.ie](http://www.howthfinancial.ie). 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 September 2022*