

# **Data Privacy Notice**

## **Introduction**

C.S.L. Insurances & Investments Ltd. t/a CSL Financial 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 General Data Protection Regulation (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 (Version 10/2018) to explain to you the information practices of CSL Financial in relation to the information we collect about you. For the purposes of the GDPR the data controller is CSL Financial (when we refer to 'we' it is CSL Financial) and our contact details are as follows:

- Telephone - (061) 308719.
- Email – info@cslfinancial.ie
- Address – 8 Slugaire, Dooradoyle Road, Limerick

Please read this Data Privacy Notice 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?**

- C.S.L. Insurances & Investments Ltd. trading as CSL Financial is regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations, 2018 and as an Investment Intermediary authorised under the Investment Intermediaries Act, 1995. It is a wholly owned subsidiary of CSL Financial Services Ltd. Please refer to our website [www.cslfinancial.ie](http://www.cslfinancial.ie) for more information.
- CSL Financial acts as a broker and is a member of Brokers Ireland. Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life & pensions products.
- Our Data Protection Officer/GDPR Owner and data protection representative can be contacted directly, details as follows:
  - Noel O'Donnell
  - Email - info@cslfinancial.ie
  - Telephone – (061) 308719

## **Purpose for processing your data**

The purpose for processing your data is to allow CSL Financial provide advice and arrange transactions and provide ongoing servicing of financial products.

The types of information we seek and process include:-

- Personal details e.g. name, address, contact details, date of birth, marital status, gender, occupation, smoking status, PPSN, earnings, dependents.
- Mortgages, loans and commitments.

- Assets, deposits and existing life, pension and investment policies.
- Financial planning needs and objectives, personal circumstances and financial situation.
- Attitude to risk.
- Health information – past, current and family history.
- Existing life, pension and investment policies.
- Bank account details for direct debit mandates.
- Employer details.

### **Why we are processing your data? Our legal basis**

In order for us to provide advice and arrange transactions and provide ongoing servicing on behalf of clients in relation to life & pensions products, CSL Financial needs to collect personal data for this purpose. Our reason for processing data under the GDPR is legal basis. CSL Financial needs to process data as this is necessary in relation to a contract of insurance to which an individual has entered into or because an individual has asked for something to be done so they can enter into a contract. Also in order to allow us carry out the purpose set out above and our compliance with legal and regulatory obligations.

In any event, CSL Financial 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 CSL Financial use the personal data it collects about me?**

CSL Financial 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 endeavor 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 – we will ensure we will obtain your explicit consent.

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

We may pass your personal data on to third parties or third-party service providers contracted to CSL Financial 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 CSL Financial 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:

- Financial institutions and product providers we hold agencies with in the course of arranging or servicing financial products (e.g. life & pensions) you have through our firm.
- Associated or partnership companies.
- Third parties nominated by you e.g. a family member, your employer or other advisor – your solicitor, accountant.

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**

CSL Financial facilitates 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 object to automated processing and profiling.
- **Right to judicial review:** in the event that CSL Financial 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 or as required or permitted for legal, regulatory or legitimate business purposes. CSL Financial will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body and our internal governance.

## **Complaints**

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

## **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**

CSL Financial may carry out profiling - automatic decision making. For example:-

- Risk Profiling - To establish a client's attitude to investment risk (relates to pensions and investments) we use manual and automated questionnaires/calculators which seek to estimate or establish the client's attitude to various levels of risk having answered a series of questions.
- 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.
- Establishing affordability and providing quotations for financial services products.

We would like you to be aware of this and you can object to this at any time – please advise us accordingly.

## **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 by telephone on (061) 308719 or email [info@cslfinancial.ie](mailto:info@cslfinancial.ie).

## **Privacy policy statement changes**

CSL Financial may change this privacy policy statement 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 statement periodically so you're aware of any changes. By using our services you agree to this privacy policy statement.