

# **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 2022) 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

## **How do we collect your information and what information do we collect?**

The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data. Our organisation collects personal data if you:-

- Request a product or service from us or seek professional advice from us.
- Register with or use our website or online applications.
- Use our website/apps and it installs cookies or other tracking technologies onto your device.
- Engage with us on social media.
- Contact us with a complaint or query.
- Apply for a position with us.

### What information do we collect?

The information we collect about you includes the following:-

1.	<b>Contact and Identifying information</b> e.g. name, address, contact details:- email address, mobile/landline numbers.
2.	<b>Unique identifiers e.g.</b> <ul style="list-style-type: none"><li>• PPS number – the reason why we collect your PPS number is to provide it to a product provider when requested e.g. pension or investment plan application.</li><li>• pension scheme reference number- the reason why we collect this is to assist in identifying you when engaging with your pension scheme provider.</li><li>• life insurance policy numbers - the reason why we collect this is to assist in identifying your existing policy(s) when providing advice to you.</li></ul>
3.	<b>Demographic details</b> e.g. age, gender, marital status, smoking status, lifestyle, insurance requirements, date of birth, dependents, photo ID, as well as collecting personal information about you. We may also use personal information about other people, for example family members you wish to insure on a policy e.g. your children/spouse.
4.	<b>Family and Beneficiary Data e.g.</b> dependents, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant.
5.	<b>Employment information</b> e.g. occupation/role, employment status (such as full/part time, contract), salary information, employment benefits, employment history.
6.	<b>Publicly available sources</b> e.g. information about you in the public domain such as director information from the Companies Registration Office.
7.	<b>Health information</b> such as information about your health status, medical records and medical assessment outcomes. We collect medical information relating to personal habits (e.g. smoking and consumption of alcohol), your medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information. This information is required when completing life insurance product applications e.g. life cover, serious illness cover, income protection.
8.	<b>Pensions and Insurance Benefits information</b> such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, pension adjustment orders.
9.	<b>Financial details</b> e.g. bank account details, details of your credit history and bankruptcy status, salary, tax bands, third-party deductions, bonus payments, benefits and entitlement data.

10.	<b>Claims Data</b> (from you and any relevant third parties).
11.	<b>Marketing preferences:</b> we will only send you direct marketing if you explicitly consent.
12.	<b>Online information</b> e.g. information about your visits to our websites – refer to our cookie policy on <a href="http://www.csfinancial.ie">www.csfinancial.ie</a> .
13.	<b>Events information</b> e.g. information about your interest in and attendance at our events, including provision of feedback forms.
14.	<b>Social media information</b> with our social media presence e.g. LinkedIn, Facebook.
15.	<b>Searches</b> that we undertake in relation to sanctions, money laundering and credit checks.

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

#### **Information we automatically collect**

We sometimes automatically collect certain types of information when you visit our websites and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your expressed consent. Further information about our use of cookies can be found in our Cookie Notice at the footer of our web page – [www.csfinancial.ie](http://www.csfinancial.ie).

#### **How do we use your personal data?**

Your personal data will be used to enable us to fulfil our contractual obligations in relation to your request for life insurance (investment, protection and pension) products, including quotations and processing applications, and providing professional advice.

1.	<b>Performing services and providing professional advice for our clients and prospective clients</b> e.g. when you require investment, protection, pension products, we use your data to enable us to provide the required product or service.
2.	<b>Statutory and other regulatory requirements</b> – we are required to carry out various obligations which include: <ul style="list-style-type: none"> <li>• AML/Sanction checking.</li> <li>• Knowing your customer “Fact Find”.</li> <li>• Adherence to the Consumer Protection Code.</li> </ul>

3.	<b>Communicate and marketing to you.</b>
4.	<b>Process claims</b> e.g. retirement claims, death claims, illness claims.
5.	<b>To contact you if required or to respond to any communications that you might send to us.</b>
6.	<b>Carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.</b>
7.	<b>Handling complaints.</b>
8.	<b>To notify you about changes to our service.</b>

### Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data.

<b>Performance of a contract</b>	When we enter a contract with you, we will collect and use your personal data to enable us to fulfil that service.
<b>Legal obligation</b>	The use of some of your personal data is necessary for us to meet our legal obligations e.g., regulatory requirements from the Central Bank of Ireland.
<b>Consent</b>	<p>Sometimes we may rely on consent as a legal basis for processing your information. Personal data is used when we need to assess risk relating to an insurance policy for you. We share this information with other third parties where it is necessary to manage these services provided to you – these services include insurance underwriters and other insurance providers.</p> <p>We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time.</p> <p>Sometimes if you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.</p>
<b>Legitimate interests</b>	Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.

If you require further information on any of the above basis for processing your data, we can provide you with further details.

### **How we share your data**

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements.

1.	<b>Insurance Partners:</b> where we need to manage the services provided to you such as product providers. You can refer to their privacy statements on their website for more information about their privacy practices.
2.	<b>Vetting and risk management agencies:</b> such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or services.
3.	<b>Legal advisers:</b> where necessary to investigate, exercise or defend legal claims.
4.	<b>Medical professionals:</b> e.g., where you provide health information in connection with a claim against your insurance policy; or when we are providing a quote for insurance.
5.	<b>EU Law enforcement bodies:</b> when required to do so by law and/or regulation, or another legal request.
6.	<b>Public authorities, regulators and government bodies:</b> where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity.
7.	<b>Third-party processors:</b> If we outsource our processing operations to suppliers that process personal information on our behalf e.g. IT service providers who manage our IT and back-office systems and telecommunications networks, accounting and payroll providers, CRM providers. These processing operations remain under our control and we have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.
8.	<b>Internal and external auditors:</b> where necessary for the conduct of company audits or to investigate a complaint or security threat.
9.	<b>Business Transaction:</b> on the sale or reorganisation of our business whether by asset or share disposal or other transaction relating to our business.

### **Transferring personal data outside of Ireland**

Where we transfer personal data to a country outside of the EEA (referred to in the GDPR as 'third country') we will ensure it is done lawfully i.e. there is an appropriate "level of protection for the fundamental rights of the data subjects". We will therefore ensure that either the EU Commission has granted an adequacy decision in respect of the third country, or appropriate specified safeguards have been put in place (e.g., Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs)).

Where we share data with organisations located in the UK - The EU Commission adopted adequacy decisions for transfers of personal data to the UK. This means that the EU accepts that the UK data protection regime is substantially equivalent to the EU regime and allows personal data to be transferred freely from the EEA to the UK. Therefore, the UK is not deemed a third country.

If we share your data with organisations located in countries outside of the EEA - There is no finding of adequacy of the transfer of data from Ireland to countries outside of the EEA. In the absence of an adequacy decision the GDPR allows the transfer if the controller or processor has provided appropriate safeguards. These safeguards include Standard Contractual Clauses (SCCs). We, the data controller must abide by the SCCs as well as the Recommendations adopted by the European Data Protection Board on measures that supplement the SCCs which will ensure the level of protection provided for within the GDPR.

### **Security**

The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

### **Retention**

CSL Financial shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary. CSL Financial may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject. Personal data will be disposed of securely.

### **Data Subjects Rights:**

CSL Financial will facilitate your 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. (The erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).
- **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.**
- **Right to make a complaint:** if we refuse your request under rights of access, we will provide you with a reason as to why.

All 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.

### **Complaints**

If 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 with our Data Protection Officer. You may also lodge a complaint with the Data Protection Commission (DPC) in Ireland, whose details are:

Data Protection Commission  
21 Fitzwilliam Square South,  
Dublin 2, D02RD28.  
Web: [www.dataprotection.ie](http://www.dataprotection.ie)  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

See website for updated contact details to reach the appropriate section within the DPC.

### **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. When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

### **Profiling – automatic decision making**

An automated decision is when we input your personal data into a computer programme and this programme analyses your personal data to provide us with a result. There is no human involvement in the decision making. If a decision is taken by automated means, you have the right to object to this and ask us to reconsider the service you have asked us to provide. Some examples of automated decisions that we undertake are listed below:-

1. Risk Profiling - to establish a client's attitude to investment risk (relates to pensions and investments) we can use automated calculators which calculate the client's attitude to various levels of risk having answered a series of questions.
2. Profiling for marketing purposes - when we seek to contact you about other services, as outlined above we can run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.
3. Establishing affordability and providing quotations for financial services products.

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

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data e.g. health data, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for insurance and pension purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to:-

- a policy of insurance or life assurance,
- an occupational pension, a retirement annuity contract or any other pension arrangement.

### **Contact Us**

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (061) 308719 or email: [info@cslfinancial.ie](mailto:info@cslfinancial.ie).

### **Privacy notice changes**

When we update this privacy notice, we will post a revised version online. Changes will be effective from the point at which they are posted. We would encourage you to review our privacy notice so that you are aware of updates.

***This privacy policy was last reviewed in January 2022.***