

Privacy Notice/Statement

Introduction

framework 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 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 **framework financial** in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- **framework financial**
- Contact details of 01 8829938
- When we refer to 'we' it is the full team at **framework financial**

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?

framework financial is a member of Brokers Ireland. The firm does not have a shareholding in any insurer and likewise no insurer has a shareholding in this firm. **framework financial** provides life assurance, pensions & investments on a fair analysis basis i.e. providing services on the basis of a sufficiently large number of contracts and product producers available within the market to enable us to make a recommendation, in accordance with professional criteria, regarding which contract would be adequate to meet your needs.

We also provide Lifestyle Financial Planning allows you to understand what needs to be in place to maintain the lifestyle you desire.

Our GDPR Owner and data protection representatives can be contacted directly here:

- framework financial, Unit Ab1 Centrepoint House, Rosemount Business Park, Ballycoolin, D11 R6WV
- info@fwf.ie
- Ph: 01 8829938

Purpose for processing your data

- We use personal data to provide business services, to meet any legal and regulatory obligations, and for legitimate business reasons; advice, arrange transactions and set up plans, service our customers with advice on claims and encashments.
- We pass data to the relevant product producers with whom we hold an agency appointment for the purpose of arranging those transactions and setting up plans.
- If we receive personal information about someone else, we must ensure we have their permission and make them aware of our Data Privacy Notice.

Why we are processing your data? Our legal basis.

In order for us to provide you with any of our range of service, **framework financial** need to collect personal data to access an individual's needs, give advice and provide those services. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis - framework financial** 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, **framework financial** 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 framework financial use the personal data it collects about me?

framework 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 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 ensure we will obtain your explicit consent

Who are we sharing your data with?

*Any information regarding the intention to disclose personal data to third parties and whether it is transferred outside the EU. In such circumstances, **framework financial** will provide information on the safeguards in place and how the data subject can also obtain a copy of these safeguards;*

*If **framework financial** is based outside of the EU and the data subject resides within it (the EU), then **framework financial** provides the data subject with contact details of a data protection representative in the EU. However, **framework financial** is currently solely based in Ireland.*

framework financials website may collect certain information from your visit, including the date and time of your access, the pages you have accessed, the name of the Internet Service Provider and the Internet Protocol (IP) address by which you are accessing the Internet, and the Internet address from which you linked to our site, if applicable. We use this information to better understand how our website is being used so that we can improve its performance.

We may pass your personal data on to third-party service providers contracted to **framework 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 their 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:

- A full list of insurers and product producers with which we deal is available on request
- Your solicitor, accountant, auditor at your request

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:

framework financial facilitate 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 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.

Additional information we are providing you with, to ensure we are transparent and fair with our processing

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. **framework 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 **framework financial** or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and **framework financials** data protection representatives (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

We use the following profiling in our business

- a) Risk profiling
- b) Establishing affordability and providing quotations for financial services

- a) Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customer's attitude to various levels of risk having answered a series of questions.

- b) Establishing affordability and providing quotations for financial services / products.

To establish a customer's needs / wish for protection and / or investment along with the cost of the products involved and the clients ability to afford these 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 01 8829938 or email us at info@fwf.ie

Privacy policy statement changes

framework financial 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