

# Privacy Statement

## MK Financial

### Introduction

MK 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.

MK Financial maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both those methods of data collection and use. MK Financial complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data.

The purpose of this Privacy Statement is to outline how we collect and deal with any personal data you provide to us while visiting this website, and how we use "cookies" technology. Naturally, if you are not happy with this Privacy Statement, you should not use this website.

By visiting this website, you are accepting the terms of this Privacy Statement. Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites. Different terms and conditions may apply to such websites, and such websites may not maintain the same standards of privacy as this website.

For the purposes of the GDPR the data controller is:

- Michael Keville
- MK Financial, Boyle Enterprise Centre, Quarry Lane, Boyle, Co Roscommon
- When we refer to 'we' it is MK 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?

Michael Keville T/A MK Financial are impartial financial advisors. Our principal business is to provide lifestyle financial Plans, financial advice and arrange transactions on behalf of clients in relation to life, pensions, savings and investment products. In order to provide you with relevant information, we may request that you provide us with information about yourself.

Our Data Protection Officer / GDPR Owner and data protection representative can be contacted directly here:

- Michael Keville
- info@mkfinancial.ie
- 086 8440541

We retain two types of information:

### Personal Data

This is the data that identifies you or can be used to identify or contact you and may include your name, address, telephone numbers, marital status, medical history, financial details, e-mail addresses and date of birth. This information is only collected from you if you voluntarily submit it to us, and we will always inform you of the reasons why we request your Personal Data.

### Non-Personal Data

Similar to most websites, we gather statistical and other analytical information collected on an aggregate basis on all visitors to our website. This Non-Personal Data comprises information that cannot be used to identify or contact you, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymised, browser types and other anonymous statistical data involving the use of our website.

We use the Non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us better design and organise our website.

## **Purpose for processing your data**

We will process any personal data you provide to us for the following purposes:

- To provide you with information about the products and services of MK Financial.
- To contact you if required in connection with your account or enquiry, and to respond to any communications you might send us.
- To process on-line application forms submitted to us for the purposes of providing financial products. Any applications submitted on-line or by e-mail will be subject to the same terms and conditions as those completed by hand in paper form including additional terms and conditions relating to credit reference checking, money laundering and regulatory notices.

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

For us to provide you with financial advice on Life Cover, Income Protection, Pensions or Investments, MK Financial need to gather and record sufficient personal and relevant information before offering, recommending, arranging or providing a financial product or service appropriate to you.

Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – MK 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, MK 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 MK Financial use the personal data it collects about me?**

MK 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, racial, ethnic origin – financial information is not classified as special categories of personal data) – we will ensure that we obtain your explicit consent.

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

We may provide Non-Personal Data to third parties, where such information is combined with similar information collected from other users of our website, for example number of unique users who visit our website, the demographic breakdown of our community users of the website, or the activities that visitors to our website engage in while on our website.

We will not disclose your Personal Data to third parties unless you have consented to this disclosure, or unless the third party is required in order to process an application or other communication from you or to perform the services that you have applied for. We will however disclose your Personal Data if we believe in good faith that we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

We may pass your personal data on to third-party service providers contracted to MK Financial while 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 MK 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:

- Third parties with whom (i) we need to share your information to facilitate transactions you have requested or (ii) you ask us to share your information.
- Service providers who provide us with support services
- Pension fund administrators, trustees of collection investment undertakings and pensions trustees, insurers/re-insurers.

We have issued all our third party processors with a Data Processor checklist asking them GDPR specific questions

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:

MK Financial facilitate your, 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.

#### Updating, Verifying and Deleting Personal Data

You may inform us of any changes in your Personal Data and, in accordance with our obligations under the Data Protection Acts 1988 and 2003, we will update or delete your Personal Data accordingly.

To find out what Personal Data we hold on you, please e-mail us at [info@mkfinancial.ie](mailto:info@mkfinancial.ie).

To have your Personal Data rectified (if it is inaccurate) or erased (if we do not have a legitimate reason to hold your Personal Data) please e-mail us at [info@mkfinancial.ie](mailto:info@mkfinancial.ie). We will comply with a request to rectify your Personal Data (if it is inaccurate) or erase your Personal Data (if we do not have a legitimate reason to hold it) within 30 days of receiving such a request from you.

#### Retention of your personal data

Data will not be held for longer than is necessary for the purpose for which it was obtained. MK Financial will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body, the Central Bank of Ireland and the type of financial product provided to you.

#### Complaints

In the event that you wish to make a complaint about how your personal data is being processed by MK Financial 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 information**

If we are collecting your data for a purpose, and you cannot provide this data the consequences of this could mean

- We are unable to provide the requested product or service to you
- Access suitability
- Where relevant, give a recommendation for a financial product or service provided by us.

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

Occasionally, in order to provide you with the correct information/product, it may be necessary for us to carry out profiling. You have the right to object to this if you so wish

Financial advisors use 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 customer's 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.

### **Security**

Your Personal Data is held on secure servers hosted by our Internet Service Provider. We take our responsibilities in relation to the security of your Personal Data very seriously. The nature of the internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the internet. No data transmission over the internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data and we will review these measures regularly.

### **Contact Us**

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (086) 8440541 or email [info@mkfinancial.ie](mailto:info@mkfinancial.ie)

### **Privacy policy statement changes**

MK 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.