

Privacy Policy - Key Financials Services

At Drumlin Financial Services Ltd, we take privacy seriously. It is important that you know exactly what we do with your personal information and the reasons why we gather it and what this means to you. This document is being provided to you in line with our obligations under the General Data Protection Regulation (GDPR), which will come into force on 25th May 2018. From that date, the GDPR, together with applicable Irish requirements, will amend existing data protection law and place enhanced accountability and transparency obligations on organisations when using your information. The GDPR will also introduce charges which will give you greater control over your personal information, including a right to object to processing of your personal information where that processing is carried out for our business.

Please take the time to read this notice carefully. If you are under 16 years of age, please read this summary with a parent or guardian and ensure you understand it.

For the purpose of GDPR the data controller is:

- Desmond Lowry
- Contact: 049 432 6841
- Aeta Place, Gortnakesh, Cavan, Co. Cavan H12 K4C8

Email us on: info@keyfinancials.ie

This summary explains the most important aspects of how we use your information and what rights you have in relation to your personal information; it also outlines our approach to Data Privacy to fulfill our obligations under the General Data protection Regulation (2018). We also welcome it as an opportunity to reassure you of the importance we place on keeping your personal data secure, and of the strict guidelines we apply to its use.

Who are we?

Key Financials are Financial Brokers with offices in Cavan and Monaghan. Established in 2005, our company's aim is to provide professional services to meet our customer's financial needs. We take the time to deal with each client personally and use our experience to ensure our clients get the plan most suitable for them. As a Financial Broker we will research products from a number of providers which will ensure that you receive market wide advice from a single contact. The purpose of this privacy notice is to explain how we collect and use personal information for the provision of our products and services and the day to day running of our business

The information we process

To allow us to provide our products and services and to run our business, we collect and process various categories of personal information throughout your relationship with us,

including basic information such as your name and contact details. We may also process certain special categories of information. We will only do so for specific purposes, such as generating the quote most suited to you based on your specific criteria for application to the life companies. These details will only be taken if it is vital to the progression and completion of proposals and will only be used to interact with the life companies on your behalf. We do periodic reviews on all information held on our clients to keep everything relevant and compliant as recommended by the Central Bank of Ireland.

How we obtain the information

We obtain information from you by means of a fact-find. This is done in the initial meeting and is used to generate a Statement of Suitability to enable the broker to liaise with different life companies and the most suited recommendation for you based on your circumstances. The electronic fact-find is a needs analysis tool used by Key Financials and was developed in house. It has 2 separate forms of security by way of encrypted files and a 4-6 digit passcode specific to each iPad which can only be accessed by the broker. Upon completion of a client fact-find it is then sent by way of encrypted email for the protection and safe transmission to the Compliance officer in Key Financials who then goes through each section to ensure all requirements have been properly completed and that the client is getting the most suitable product on the market to suit their needs. Clients who are interested in submitting an application for a pension, saving or investment are also required to do an Attitude to Risk questionnaire to generate a risk rating to establish their attitude to investment risk.

Your rights

You have certain legal rights to control your information and the manner in which we process it. This includes:

- A right to get access to your personal information
- A right to request us to correct inaccurate information, or update incomplete information
- A right to request that we restrict the processing of your information in certain circumstances
- A right to receive the personal information you provided to us in a portable format
- A right to object to us processing your personal information in certain circumstances (for example if you believe we are not using your information in a lawful manner, or for the purposes for which it was provided)
- Where we have requested your permission to process your information, a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities
- You have the right to object to us processing your information for direct marketing purposes, including proling you for the purposes of direct marketing

- You have the right to withdraw consent for processing of your information at any time.

PLEASE NOTE THAT IN SOME CASES, IF YOU DO NOT AGREE TO THE WAY WE PROCESS YOUR INFORMATION, IT MAY NOT BE POSSIBLE FOR US TO CONTINUE TO OPERATE YOUR ACCOUNT AND OR/PROVIDE CERTAIN PRODUCTS/OR AND SERVICES TO YOU.

Subject access request

If you would like a copy of the personal information we hold about you or wish to instruct any amendments of the above actions to be processed please phone the office on 049 432 6841 or email your request to info@keyfinancials.ie. On receiving your request we will issue a subject access/amendment request form to your address to be completed. This form will enable you to request exactly what information you need/want. Once we have received your request back in the office we will process your information and will have it out to you within the GDPR guideline timeframe of 1 month (30 days).

Subject Access Requests

Key Financials
Aeta Place, Gortnakesh, Cavan
Co.Cavan

The office is open Monday to Friday from 9.00am – 5pm.

We hope that we can address any concerns you may have, but you can always contact the Data Protection Commissioner, Canal House, Station Road, Portarlinton, R32 AP23, County Laois, Ireland. Phone + 353 (0) 761 104 800; LoCall 1890 25 22 31;

email info@dataprotection.ie. For more www.dataprotection.ie

Changes to the way we use your information

It is in our interest as a business to ensure that we provide you with the most appropriate products and services and that we continually develop and improve as an organisation. This may require us to process your information to understand your preferences and expectations to help us improve or develop new products and services and the relevance of oers from the list of life companies mentioned above.

How we use and share your information

We will only use and share your information where it is necessary for us to carry out our business activities. We process your information to provide you with products or services relevant to your needs and where it is necessary in terms of the contract set up with you (for example to set up certain policies the Life companies request certain requirements to be sent in along with the application, this can include Anti money laundering requirements {including photo ID, Utility bills and proof of PPS})

Sharing with third parties

We will only share your information with a third party on a limited basis following due diligence and in accordance with our internal procedures

Where we have your permission – this is given on completion of the fact-find as discussed earlier via signed digital signature

Where required for your product or service – proposal of New business

With third parties providing services to us and sub-contractors acting on our behalf – Best advice – Omnibroker, Aviva, Friends First, Irish Life, New Ireland, Standard Life, Zurich Life, Royal London, KBC, ITC & Wealth Options.

Associated with your product or service

Where required for a sale, reorganisation, transfer, financial arrangement, sub-participation, asset disposal or other transaction relating to our business

Key Financial Services will not share your information with third parties for their own marketing purposes without your permission.

Transferring information overseas

Key Financial Services do not share any information overseas, unless instructed to do so by the client. This will only be actioned by a written instruction from the client to Key Financial Services.

Marketing information

On completion of the fact-finding process the client will have advised whether or not they wish to receive marketing information by mail, phone, email, text and other forms of electronic

communication. If you change your mind about how you would like us to contact you or you no longer wish to receive this information, you can tell us at any time by contacting us at the office on 049 432 6841 or via email on info@keyfinancials.ie and requesting a subject amendment form. Please also note: On completion of the application form that you will have submitted to the relevant life company, they will also have looked for your instruction as to whether you wish to receive marketing information specifically from them. You will also have indicated through which method of correspondence you wish to receive same. The life company will send you relevant marketing information including details of other products or services provided which they believe may be of interest to you should you avail of the option.

Communications about your policy

We may from time to time contact you by your preferred method of contact to query if you would like a review or if you are happy with your current policies or alternatively you can contact us at 049 432 6841 or info@keyfinancials.ie and request a review. Upon getting this request we will fill out a contact sheet for client reviews

How long we keep your information

We normally keep customer records for up to seven years after your relationship with us ends, unless we have an obligation to keep it longer (for example due to a court order or investigation by law enforcement agencies or regulators). A more detailed breakdown of how long we keep your information is available in our Retention schedule available on our website www.keyfinancials.ie By providing you with products or services, we create records that contain your information, such as application forms, AML (ID & utility bills proof of PPS) Records can be held on a variety of media (physical or electronic) and formats. Records help us to serve our customers well, to demonstrate that we are meeting our responsibilities and to keep as evidence of our business activities. Keeping customers' personal data up-to-date may mean doing periodic reviews. This enables us to watch out for inaccurate and obsolete contact phone numbers, postal and email addresses.

Security

We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf. For this reason we take every precaution to keep your information up to date and relevant for the reason it is gathered and maintained. We have structures and guidelines in place for the security of all personal files which include locked fireproof filing cabinets which are kept in Key Financials offices and are kept in a locked room at all times. Access to this room is restricted to only 3 data processors and the 4 directors of the company.

All computers have personal passcodes and can only be accessed by the authorised personnel and all data is stored on the cloud.

Information Amendment

If you wish to amend the information we have on file for you, you can do so with the form below. Please return the completed form, with photographic ID for all policyholders that this amendment includes.

Completed forms can be sent to:

Subject Amendments- Key Financial Services, Aeta Place, Gortnakesh, Cavan, Co. Cavan

OR emailed to:

info@keyfinancials.ie

[Subject Amendment Form can be found on 'Privacy Policy' tab on our website](#)

Data Requests

As our customer, you are entitled to request a copy of the personal data we hold about you within 30 calendar day for no charge. No information will be provided until all sections of this form are completed and sent back to us.

Completed forms can be sent to: **Data Requests- Key Financial Services, Aeta Place, Gortnakesh, Cavan, Co. Cavan**

OR emailed to: **info@keyfinancials.ie**

[Data Request Form can be found on 'Privacy Policy' tab on our website](#)