



64 Mount Street Lower, Dublin 2, Ireland
T: +353 1 653 3120 | info@affinityadv.ie
Member of the Association of Irish Mortgage Advisors

Data Privacy Statement of Affinity Mortgages Ltd t/a Affinity Advisors

Affinity Advisors 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 to and in line with the General Data Protection Regulation (GDPR) in relation to not only processing your data but ensuring you understand your rights as a customer.

It is the intention of this privacy statement to explain to you the information practices of Affinity Advisors in relation to the information we collect about you. These terms will take effect from 25th May 2018.

1. Who are we?

Affinity Advisors is a financial advisory firm which specialises in the provision of advice in relation to mortgages, mortgage protection, term assurance, critical illness, income protection and pensions. We are a mortgage credit and insurance intermediary firm which means we act as the “middle man” between you, our client, and our product providers which are the financial/lending institutions and insurance companies.

2. How you can contact us.

- by phoning us on 01 653 3120
- by writing to us at 64 Mount Street Lower, Dublin 2
- by emailing us at info@affinityadv.ie
- if you have a specific query about this Data Privacy notice you can contact our Data Protection Officer on dataprotection@affinityadv.ie. Our Data Protection Officer oversees how we collect, use, share and protect your information to ensure your rights are fulfilled. We you contact us to ask about your information, we may ask you to identify yourself. This is to protect your information.
- by writing to the Data Protection Officer, Affinity Advisors, 64 Mount Street Lower, Dublin 2



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- If you do not agree with our response you can write to the Office of the Data Protection Commissioner:

Office of the Data Protection Commissioner	Phone: 00 353 57 868 4800/ 00 353 761104800
Station Road	LoCall: 1890 25 22 31
Portarlinton	Fax: 00353 57 868 4757
Co. Laois	Email: info@dataprotection.ie
R32 AP23	Web: www.dataprotection.ie

3. Purpose for collecting and processing your data.

The information we collect and hold about you depends on the products and services you use. This information includes personal information you give us when you are looking for a product or service, personal information we collect automatically such as your IP address, the date and time you accessed our services when you visited our website and personal information we receive from sources such as lender affordability calculators and insurance quotation tools.

The chart below outlines what personal information we hold about you and how we use it.

Types of Information	Examples of how we use the information
Identity Information	
Name, address, date of birth, sex, nationality, PPSN, driving licence, passport	This information is use to identify you and to combat fraud and other illegal activity
Contact Information	
Email address, telephone number, technical information such as IP address	We use your contact information to provide you with the products and services you have requested and to respond to enquiries and complaints. We will also use your contact information to contact you or interact with you in connection with the product you currently hold with us or service that we currently provide, for example in order to discuss a change in your mortgage interest rate or a change to your insurance policy.
Information to help us provide the products and services that you have requested (under the existing relationship)	
Financial details, financial circumstances, employment and income details, expenditure, family details and composition, credit history	To determine the most suitable mortgage/associated insurance product such as mortgage protection/life assurance/income protection policy for you.

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details, account numbers, risk appetite, health information, key relationships such as doctors details, banking details	Any information you provide about other people such as second applicants please ensure you have their consent to us using that information or that you are allowed to use that information.
Information on your physical or mental health	With your consent and to provide you with a life assurance or income protection product we collect and process information you have provided us in relation to your health. We also use this information if you require and request a change to a product/service.
Information from the website	When you undertake the remortgage challenge on our website or contact us via our website, we use this information to contact you and provide you with a suitable product/service.
Information provided by 3rd parties	
Information obtained through agreements with third parties such as Financial Institutions/Lenders, Life Assurance Companies, credit referencing agencies such as Irish Credit Bureau, Central Credit Register, joint applicants, ID Pal, people appointed to act on your behalf.	We use this information to help us offer you suitable products and services.

4. Why we are processing your data? Our legal basis.

We at Affinity Advisors need to collect personal data from you in order for us to provide you mortgages and associated insurance products such mortgage protection, life assurance, critical illness, income protection and pension products and services. Our reason (lawful reason) for processing your data under the GDPR is for the performance of your contract:

- **Legal basis** – Affinity Advisors needs to process your data as this is necessary in relation to a contract of mortgage finance or associated insurances or pension to which you, the individual has entered into or because you, the individual has asked for something to be done so you can enter into a contract.



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From the 25th May 2018 all new clients of Affinity Advisors will need to consent to the processing of their data.

In any event, Affinity Advisors 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.

5. How will Affinity Advisors use the personal data it collects about me?

Affinity Advisors will process (collect, store and use) the information you provide in a manner compatible with the EU's GDPR. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. The chart outlined earlier gives you details as to why and how we use your personal data.

6. Special Categories of personal data

When 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 to obtain your explicit consent in line with the GDPR requirements.

7. Who are we sharing your data with?

We pass your personal data on to third-party service providers contracted to Affinity Advisors in the course of dealing with you. Your personal information is transferred securely and is not used by other parties for any reason. 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.

If we pass your sensitive personal data onto third party service providers contracted to Affinity Advisors, 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/Lenders with whom we hold a written appointment with;
- Life Assurance companies with whom we hold a written appointment with;
- Introducers of business to us with whom we may share details of any transactions arranged for you;
- Our home insurance partner to whom with your consent, we forward details of your home insurance requirements for the purposes of arranging your mortgage;
- Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, an Garda Síochána, the courts, fraud prevention agencies and other bodies to enable us cooperate by law as we are required to do so;

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- We use the services of ID Pal, a digital Know your Customer solution, that enables us to verify the identity our clients so as to comply with anti-money laundering requirements;
- We use the services of iPing, an IT support company, and information security service providers such as Microsoft and Intellicom;
- We engage the services of Money Advice, a software company, that provide us with a comprehensive quotation and customer relationship management (CRM) platform.
- We use the services of Mailchimp (trading as Mailchimp) who support the issue of our service emails. Mailchimp are based in the United States and any personal data we share with them is done so in accordance with the EU Standard Contractual Clauses. The only information passed includes your name and/or email address. Mailchimp may collect information about your devices and your interaction with emails; this information may be used to improve the content and operation of services and to facilitate related research and analysis

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.

8. Security Measures to safeguard your personal information

We use internal technical and organisational measures to protect your personal information from unauthorised access to help ensure the appropriate use of your personal information and to maintain data accuracy. These security measures include password protecting of your personal information, physical protection of the premises, firewalls, encryption on all company devices and strong security protection procedures.

9. Data Subjects Rights:

Affinity Advisors 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.

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- **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 Affinity Advisors 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.

10. Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Affinity Advisors 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, the requirements of the Financial Services Ombudsman and our internal governance.

11. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Affinity Advisors or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Affinity Advisors Data Protection Officer/GDPR Owner.

12. Failure to provide further information

If we are collecting your data for a specific contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

13. Automated Decision Making and Profiling

Automated Decision Making

We, in conjunction with lenders and life assurance companies use calculators and quotation tools to establish your affordability for credit and when providing quotations to you for associated insurance products. Whilst some providers may carry out these processes on an automated basis, we operate with human intervention and



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take into account information you provided us in your application form for a mortgage or proposal form for an insurance product, your health history, your credit history, other credit facilities you have with financial institutions, amount of mortgage requested, amount of life assurance request, the repayment or cover period etc. If you disagree with any of these decisions please contact us via the channels outlined in Section 2 above.

Risk Profiling

To establish a customer's attitude to investment risk in relation to pensions, advisors may use automated calculators which calculate the customers' attitude to various levels of risk having answered a series of questions.

Profiling for marketing purposes

We currently do not profile our customers for marketing purposes however if in the future we choose to do this, we will seek your consent and tell you how you can object to profiling, including profiling for marketing purposes.

14. Marketing

We require your consent to market new products and services. (For existing relationships we will not market *new* products or services to you but, per the chart above, we may contact you in relation to the existing product or service we provided you, for example in order to discuss a change in your mortgage interest rate or a change to your insurance policy). For new products and services, we will ask you to consent at the beginning of the relationship.

15. 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.

Privacy policy statement changes

Affinity Advisors 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.

Version 2- 5th May 2020