

# Privacy Policy

## Introduction

Bluechip Financial Consultants Ltd 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 Bluechip Financial Consultants Ltd in relation to the information we collect about you.

For the purposes of the GDPR the Data Controller is:

- Bluechip Financial Consultants Ltd
- Contact details of Bluechip Financial Consultants Ltd
- When we refer to 'we' it is Bluechip Financial Consultants Ltd

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?

Bluechip Financial Consultants are an Insurance Broker authorised and regulated by the Central Bank of Ireland. We provide fee-based advice to company and personal clients in all aspects of pensions, Investments and protection policies.

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

- Name: Brendan Kane
- Email address: bkane@bluechipfc.ie
- Phone number: 01-2055188

## Purpose for processing your data

In order that we can provide you with our best in class investment and advice services, you may provide via online forms, personal information including name, address, dates of birth, and details of your financial circumstances, and in some cases personal sensitive data e.g. medical information. It is our policy to operate procedures to the highest standards of client confidentiality and to meet our statutory requirements under the Data Protection Acts 1998 and 2003.

We will only use this information to provide you with a range of assurance, investment, and any other products which we believe may be in your best interest or to meet our regulatory obligations. We will therefore only pass information to our staff, consultants, support service providers, or at your request to other parties, such as the financial institution from which you decide to purchase a product or service, except where other disclosure is required by Law.

From time to time, we would like to send you information about various products and services which we can arrange or provide for you. You have the right to ask us not to send this marketing information to you and can decide to ask us to do this at any time. You may do this by e-mail, telephone, fax or post; full contact details will be provided on our website.

By providing this information, you confirm that you agree that Bluechip Financial Consultants may contact you in relation to your current business and other products which may be appropriate to your circumstances.

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

In order for us to provide you with impartial financial advice (life, pensions, investments) Bluechip Financial Consultants Ltd need to collect personal data. Our reason (lawful reason) for processing your data under the GDPR is:

**Legal basis** - Bluechip Financial Consultants Ltd needs to process your data as this is necessary in relation to a contract of assurance 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 for life, pension or investment business.

In any event, Bluechip Financial Consultants Ltd 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 Bluechip Financial Consultants Ltd use the personal data it collects about me?**

Bluechip Financial Consultants Ltd 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 obtain your explicit consent (signature on application form).

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

We only share your information with a select number of individuals and companies, and only as necessary. Sharing can occur in the following circumstances and/or with the following persons:

- Your authorised representatives:
- When you apply to us for life, pension and investment business or seek financial service advice. We will pass your details to the insurer and reinsurer.
- We may request information relating to your health for underwriting and claims administration purposes.
- If you make a claim, any information you give us, or to the insurer, may be put onto a register of claims and shared with other parties to prevent fraudulent claims. A list of the participants is available from the insurer.

- Pension fund administrators, trustees of collective investment undertakings and pensions trustees.
- Persons making an enquiry or complaint.
- Insurers/re-insurers and insurance bureaus.
- Statutory and regulatory bodies (including central and local government) and law enforcement authorities. These include the courts and those appointed by the courts, government departments, statutory and regulatory bodies. In all jurisdictions where Bluechip operates including: the Central Bank of Ireland, the Data Protection Commission, Financial Services Ombudsman, An Garda Síochána/police authorities/enforcement agencies, Revenue Commissioners, Criminal Assets Bureau, US, EU and other designated authorities in connection with combating financial and other serious crime, NAMA and its agents or other parties designated by or agreed with NAMA or designated under the relevant legislation, police forces and security organisations, ombudsmen and regulatory authorities, as well as fraud prevention agencies.

We may pass your personal data on to third-party service providers contracted to Bluechip Financial Consultants Ltd 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 Bluechip Financial Consultants Ltd 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.

We have issued all our third party processors with a Data Processor checklist asking them GDPR specific questions to ensure that they are GDPR compliant.

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:**

Bluechip Financial Consultants Ltd 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 we refuse 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. Bluechip Financial Consultants Ltd will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body Central Bank of Ireland our internal governance.

#### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Bluechip Financial Consultants Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Bluechip's 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 – automatic decision making**

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Profiling;

- a) Risk profiling.
- b) Profiling for marketing purposes.
- c) Establishing affordability and providing quotations for financial service product

#### **a) Risk Profiling**

To establish a customer's attitude to investment risk (relates to pensions and investments) through automated calculators which calculate the customers 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 (life, pensions, investments) we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

- a) Establishing affordability and providing quotations and underwriting decisions 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.

### **Contact Us**

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (01) 2055188 or email [dataprotection@bluechipfc.ie](mailto:dataprotection@bluechipfc.ie)

### **Privacy policy statement changes**

Bluechip Financial Consultants Ltd 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.

Date: May 2018

*This privacy policy was last reviewed and updated in May 2018*