

# **FRANK LENNY FINANCIAL**

---

## **Privacy Notice**

Frank Lenny Financial Services Limited is committed to respecting and protecting your privacy and would like you to feel safe when you give us your personal details.

We will always clearly identify ourselves in correspondence and on our website.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Mortgages, Life, Pensions, Investments, Deposits and General insurance products.

To provide you with relevant information, provide a financial services product and respond to your requests we will request that you provide us with information about yourself and the products/service you require.

This Privacy Notice will inform you of the information we gather and how it is used and for long we maintain your data.

Frank Lenny Financial Services Limited complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data.

### **Name and Contact Details of our firm**

Frank Lenny Financial Services Ltd t/a Frank Lenny Financial

Mortgage House, 66 South William Street, Dublin 2.

**(Tel.)** 01 6703655 / 6703686 / 087 2336326

**(Email)** [info@franklenny.com](mailto:info@franklenny.com)

Frank Lenny Financial Services Ltd t/a Frank Lenny Financial is regulated by the Central Bank of Ireland and is entered on its register under number C7494.

## **Types and categories of personal data held**

### **Mortgage Products**

- Salary Certificate (obtainable from employer),
- Payslips,
- P60's,
- Historic Mortgage statements,
- Loan statements,
- Savings Records,
- Photo ID,
- Utility Bill (for current address).
- Current Account statements.
- Credit Card Statements.
- Business company accounts.
- Business Bank Statements.
- Tax clearance documentation.
- Revenue Returns.
- Employment Contracts.
- Past Employer contracts.
- Educational records.
- Gift letter.
- Separation agreements (if applicable).
- Completed mortgage application form.

### **Life Products**

- Completed application form
- Completed fact-find containing – personal details, details of existing policies held by you, details of product required. Medical history documentation.

### **Investments/Pensions**

- Completed application form
- Completed fact-find containing – personal details, details of existing policies held by you, details of product required. AML Documentation verifying identity and address.

## **House Insurance Products**

- Completed statement of fact and supporting documentation Property valuation report, Asset Valuations.

## **Deposits**

- Completed application form
- Completed fact-find containing – personal details, details of existing policies held by you, details of product required.

## **Use of the information we gather**

When we collect information about you, we tell you why we are asking for the information and what we intend to do with it. You will have the option of not providing the information, although in these instances, you may not be able to access certain products/services.

Our reason for processing your data under the GDPR is in order to be able to provide you with a retail financial product, be it a mortgage product, life insurance product, an investment or pension product, House Insurance or Deposit. We require the information form you in order to assist our firm to ascertain your actual needs/requirements.

## **Retention of your Personal Data**

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained – our company policy is to hold all client data for 7 years. This fulfils our obligations under the Central Bank of Ireland's Consumer Protection Code 2012 and our obligations under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010.

## **Sharing information with third parties**

Personal data we collect from you, or that you provide to us, will be processed by us, including the data collected in relation to contracts of insurance with insurers and mortgage products with lenders, for which we act as investment, mortgage and insurance brokers – we will share this data with the product providers we hold agencies with – details of which are available on request. We do not share your data with any other 3<sup>rd</sup> party.

## **Data security**

Frank Lenny Financial Services Limited's intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect from you.

## **How to update and/or amend the personal information you have provided**

You are entitled to know whether we hold information about you and, if we do, to have access to that information and have it corrected if it is inaccurate or out of date.

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 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 or 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.
- 

## **The right to complain to the DPC**

If you are not satisfied with how we store your client data or fail to satisfy a Data request you have the right to make a complaint to the Data Protection Commissioner, see contact details below:

Data Protection Commissioner, 21 Fitzwilliam Square, Dublin 2, D02 RD28, Ireland

Lo Call Number      1890 252 231

Fax                      +353 57 868 4757

E-mail                      [info@dataprotection.ie](mailto:info@dataprotection.ie)

## **Contacting Us**

If you have any questions or comments about our privacy notice or practices, please contact us.

**(Tel.)** 01 6703655 / 6703686 / 087 2336326

**(Fax.)** 01 6703685

**(Email.)** [info@franklenny.com](mailto:info@franklenny.com)

Frank Lenny Financial Services Limited may modify or update this privacy notice from time to time at any time without prior notice. You can check the “Last Updated” date below to see when the notice was last changed. We encourage you to check this notice often so that you can continue be aware of how we are protecting your personal information. Your continued use of the website constitutes your consent to the contents of this privacy notice, as it may be modified from time to time.

Last Updated: 24<sup>th</sup> May 2018.

Effective Date: 25<sup>th</sup> May 2018.