



CULLETON

- FINANCIAL -

PRIVACY POLICY

Opus Financial Ltd t/a Culleton Financial is regulated by The Central Bank of Ireland Registered in Ireland Number 512771

Director: J Gannon. Registered Office: Suite 19, 6th Floor, Corporate Offices, The Atrium, Maritana Gate, Canada St. Waterford City.

Privacy Statement

Opus Financial Ltd t/a Culleton Financial are committed to protecting and respecting your privacy.

It is the intention of this privacy statement to explain to you the information practices of Opus Financial Ltd t/a Culleton Financial in relation to the information we collect about you and other users.

For the purposes of the GDPR the data controller is:

- Jenny Kirwan
- Opus Financial Ltd. t/a Culleton Financial, Suite 19, The Atrium, Maritana Gate, Canada Street, Waterford.

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?

Culleton Financial has over 40 years' experience in providing Irish & International clients with Financial Solutions in the complex world of International Investment Markets. Our services include: Family Protection, Occupational Pension Schemes, and Personal & Executive Pensions & Investments.

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

- info@culletonfinancial.ie
- 051-508081

Purpose for processing your data

Why do Culleton Financial Ltd t/a Culleton Financial need to collect and store personal data?

In order for us to provide you with our services we need to collect personal data for quotations and underwriting and for verification purposes as set out by the Central Bank requirements. In any event, we 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.

In terms of being contacted for marketing purposes Opus Financial Ltd t/a Culleton Financial would contact you for additional consent.

How will Opus Financial Ltd t/a Culleton Financial use the personal data it collects about me?

Opus Financial Ltd t/a Culleton 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.

Opus Financial Ltd t/a Culleton Financial are required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Opus Financial Ltd t/a Culleton Financial contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Why we are processing your data? Our legal basis.

Our reason and purpose for processing your personal data is:

- We have your **consent**
- We need to process your data to complete the **performance of a contract**
Where you, the data subject is a party to the *Opus Financial Ltd t/a Culleton Financial processes data without consent in order to fulfil contractual obligations [such medical details for underwriting, bank account details for contract payment, Tax details, in order to supply products and services, etc.]*.
- **Legal obligations** that need to be adhered to.
- Protect the **vital interests of the data subject**, including the protection of rights and freedoms.
- Processing that is in the **public interest**.
- Necessary for the **legitimate interests of the data controller** or third party, unless the processing is overridden by the vital interests, including rights and freedoms.
- **National law**.

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 ensure the below:-

- We will obtain your explicit consent.
- Ensure the personal data is necessary for employment rights or obligations.
- Protect the vital interests of the data subject, including the protection of rights and freedoms.
- The legitimate activities with appropriate safeguards.
- Preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, provision of health or social care treatment, or management

of health and social care systems and services, under the basis that appropriate contracts with health professionals and safeguards are in place.

- **Public health**, ensuring appropriate safeguards is in place for the protection of rights and freedoms of the data subject, or professional secrecy.
- National Laws are upheld in terms of processing genetic, biometric or health data.

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Opus Financial Ltd t/a Culleton Financial, 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 Opus Financial Ltd t/a Culleton Financial procedure. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are otherwise legally required to.

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:

Opus Financial Ltd t/a Culleton Financial facilitate the data subject's rights in line with the data protection policy and the subject access request procedure. This is available on request from The Office Manager, Opus Financial Ltd t/a Culleton Financial, Suite 19, The Atrium, Mariana Gate, Canada St, Waterford. 051-508081 or via email at info@culletonfinancial.ie.

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 organization.
- **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 Opus Financial Ltd t/a Culleton Financial refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

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. Opus Financial Ltd t/a Culleton Financial will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank, Revenue) and our internal governance.

Withdraw consent

If we are relying on your consent to process your data you can withdraw this at any time – this does not affect the lawfulness of processing based on your consent before its withdrawal.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Opus Financial Ltd t/a Culleton Financial (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Opus Financial Ltd t/a Culleton Financial, Complaints data protection representatives Data Protection Officer / GDPR Owner The Office Manager at Suite 19, the Atrium, Maritana Gate, Canada St, Waterford at 051-508081 or email info@culletonfinancial.ie

Failure to provide further information if need see Art 12(e)

If we are collecting your data for a statutory requirement (payroll) or to fulfil a contract (life policy or motor insurance policy) 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

Should Opus Financial Ltd t/a Culleton Financial need to carry out automatic decision making Opus Financial Ltd t/a Culleton Financial will inform the data subject and explain the significance and the envisaged consequences involved. Opus Financial Ltd t/a Culleton Financial will inform the data subject that they can object to this. e.g. insurance underwriting

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.

If we have received your personal data from another source:

If Opus Financial Ltd t/a Culleton Financial have collected your personal data from another source, Opus Financial Ltd t/a Culleton Financial is committed to protection and respecting your privacy.

It is the intention of this privacy statement (“Privacy Statement”) to explain to you the information practices of Opus Financial Ltd t/a Culleton Financial in relation to the information we collect about you and other users.

We want to share any other information required to demonstrate that the processing is fair and transparent.

The Categories of personal data we have collected are:

- Who we are sharing this data with
- If we have received your personal data from another source we will endeavour to share with you:
- One month of obtaining the personal data, in accordance with the specific circumstances of the processing;
- At the first instance of communicating in circumstances where the personal data is used to communicate with the data subject;
- When personal data is first disclosed in circumstances where the personal data is disclosed to another recipient.

The above will not apply when:

- If you already have the information;
- If the provision of the above information proves impossible or would involve an excessive effort
- If obtaining or disclosure of personal data is expressly identified by Member State law; or
- If personal data must remain confidential subject to an obligation of professional secrecy regulated by Member State law, including a statutory obligation of secrecy.

Responsibilities

The Data Protection Officer/GDPR Owner is responsible for ensuring that the privacy notice(s) is correct and that mechanisms exist such as having the Privacy Notice(s) on Opus Financial Ltd t/a Culleton Financial website to make all data subjects aware of the contents of this notice prior to Opus Financial Ltd t/a Culleton Financial commencing collection of their data.

All staff that is required to collect personal data is required to follow this procedure.

Questions Regarding the Privacy Statement and Conditions of Use

If you have any questions about our Privacy Statement and Conditions of Use, or any concern about privacy at the IAPP or the use of this Site in general, please contact us by email at info@culletonfinancial.ie

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.