

Privacy Statement

Introduction

Blackthorn Financial Services Ltd t/a One Finance 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 life, pensions, investments, savings and insurance products.

In order to provide you with relevant information, respond to your enquiries and requests for products and/or services we sometimes request that you provide us with information about yourself. This Privacy Notice will inform you of the information we gather and how it is used.

Blackthorn Financial Services Ltd t/a One Finance maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both those methods of data collection and use. Blackthorn Financial Services Ltd t/a One Finance complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data.

You may visit our website without identifying yourself or revealing any personal information. Blackthorn Financial Services Ltd t/a One Finance will collect domain information from your visit to customise and improve your experience on our website. This website may collect certain information from your visit, including the date and time of your access, the pages you have accessed, the name of the Internet Service Provider and the Internet Protocol (IP) address by which you are accessing the Internet, and the internet address from which you linked to our site, if applicable. We use this information to better understand how our website is being used so that we can improve its performance.

Who are we?

One Finance is authorised to provide advice and arrange business on your behalf in relation to insurance policies. Insurance policies include mortgage protection, life and serious illness cover, pensions, permanent health insurance, savings plans. The principal regulated activities of the firm are provided on the basis of fair analysis of the market. We can also provide advice on investments in other non-insurance type investments, and we offer a certified financial planning service. This involves analysing your current financial situation, and preparing an objective financial plan aligned with your objectives.

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

- **Martin McDonnell**
- **martin@onefinance.ie**
- **042 9352287**

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.

Use of the information we gather/Purpose why we are processing your information

Generally, we may collect your data for one or more of five reasons based on below;

1. To respond to your request(s) for advice or products or queries in relation to same.
2. Reviewing your financial, insurance or mortgage position or products as is prudent or required.
3. To recommend products that protect your lifestyle e.g. protecting your family (including mortgage) in the event of death.
4. Planning your financial future e.g. retirement funding, savings and investment options.
5. Insurance enquiry, advice or placing insurance cover.

When we collect information about you, we intend to 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, in which case you may still be able to access other parts of this website, although you may not be able to access certain services. In certain areas of our website, we may, where appropriate, enable you to 'opt in' to certain uses of your information e.g. personal data and direct marketing.

Data will not be held for longer than is necessary, credit card transactions will be held for the duration of the transaction and general client details will be held while you are a customer. Our Regulator, The Central Bank of Ireland, requires that where clients have products with us that we maintain their data for six years after the last product expires or is cancelled.

The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to verify your identity, send you information or contact you in relation to a Blackthorn Financial Services Ltd t/a One Finance product or service that you are using or that we believe may be of interest to you after you have chosen to 'opt in'.

Special Categories of personal data

As you use our services, apply for products, make enquiries and engage with us, information is gathered about you. We may also collect information about you from other people and other parties, for example, when you are named in an insurance policy application, from credit rating agencies and from sources where you have chosen to make your information publicly available, such as social media sites.

How we use your information and the legal basis

Whether we're using it to confirm your identity, to help in the processing of an application for a product or service or to improve your experiences with us, your information is always handled with care and the principles outlined in this Data Privacy Notice are always applied.

We use your information:

- To provide our products and services to you, and to fulfil our contract with you
- To manage our business for our legitimate interests
- To run our business on a day to day basis including to:
- To comply with our legal and regulatory obligations
- Where you have given us permission (which you may withdraw at any time)

Profiling – automatic decision making

Profiling;

Financial advisors using profiling in their business. The main categories are

- Risk Profiling
To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customers attitude to various levels of risk having answered a series of questions.
- Profiling for marketing purposes.
When we seek to contact you about other services, as outlined above * we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.
- Establishing affordability and providing quotations for financial services products.

Who are we sharing your data with?

In certain instances, we may make your information available to third parties with whom we have a relationship where that third party is providing services on our behalf to clients. You can view the list of product providers we hold agencies with via the Central Banks website. We will only provide those third parties with information that is necessary for them to perform the services and we take measures to protect your information.

The information we collect may be used, stored and processed in the EU, UK, United States, Switzerland or in any other country in which Blackthorn Financial Services Ltd t/a One Finance does business. We will always try to process data within the EU and UK.

Blackthorn Financial Services Ltd t/a One Finance may disclose information it has collected about you on the website if required to do so by law or when necessary to protect the rights of Blackthorn Financial Services Ltd t/a One Finance or its employees.

We have issued all our third-party processors with a Data Processor checklist asking them GDPR specific questions

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.

If you do not provide information we may not be able to:

- provide requested products or services to you;
- to continue to provide and/or renew existing products or services
- assess suitability; and
- where relevant, give you a recommendation for a financial product or service provided by us.

Why we are processing your data? Our legal basis.

In order for us to provide you with advice and arrange business on your behalf in relation to insurance policies, investments, non-insurance type investments and certified financial planning services, One Finance needs to collect personal data. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – One Finance needs to process your data as this is necessary in relation to a contract of insurance 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 with us (e.g. you have asked us to provide you with a quote for an insurance product).

In any event, One Finance 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 One Finance use the personal data it collects about me?

One Finance 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 ensure the below

- we will obtain your explicit consent

Data Subjects Rights:

One Finance will 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 One Finance 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

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. One Finance 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 and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by One Finance or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Organisation Name's data protection representatives Data Protection Officer / GDPR Owner

Failure to provide further information

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

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 042 9352287

Privacy policy statement changes

One Finance 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.