



Paul Ryan Pension & Financial Consultants Limited

## Privacy Notice

### Introduction

Paul Ryan Pension & Financial Consultants Limited 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 Paul Ryan Pension & Financial Consultants Limited in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Paul Ryan Pension & Financial Consultants Limited
- Telephone: 01-4546730/Email: [info@paulryan.ie](mailto:info@paulryan.ie)
- When we refer to 'we' it is Paul Ryan Pension & Financial Consultants Limited

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?

Paul Ryan Pension & Financial Consultants Limited was established in 1996 and provides financial advice to both individuals and companies in respect of Life, Pension, Savings, Investment & Deposit products.

Paul Ryan Pension & Financial Consultants Limited is regulated by the Central Bank of Ireland.

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

- Alan Ryan/Claire Mooney
- [info@paulryan.ie](mailto:info@paulryan.ie)
- 01-4546730

## Purpose for processing your data

- Client personal data is used for the purposes of providing services to you as a client, also for the setting up and ongoing administration of financial products and policies arranged through Paul Ryan Pension & Financial Consultants Limited, or any other legitimate purpose
- Client personal data will also be used to fulfill our legal obligations.
- Your personal data will not be disclosed to any third party other than where we are obliged to do so.

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

In order for us to provide you with Life, Pension, Investment, Savings or Deposit advice Paul Ryan Pension & Financial Consultants Limited need to collect personal data to assess product suitability. Our reason for processing your data under the GDPR is:

- **Legal basis** – Paul Ryan Pension & Financial Consultants Limited 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 for Life, Pension, Investment, Savings or Deposits.
- The use of some of your personal data is necessary for us to meet our legal obligations e.g., pension contributions for Revenue Certificates, Regulatory purposes to the Central Bank.

In any event, Paul Ryan Pension & Financial Consultants Limited 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.

If you require further information on any of the above basis for processing your data, we can provide you with further details.

## How will Paul Ryan Pension & Financial Consultants Limited use the personal data it collects about me?

Paul Ryan Pension & Financial Consultants Limited 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 endeavor 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

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

We may pass your personal data on to third-party service providers contracted to Paul Ryan Pension & Financial Consultants Limited 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 Paul Ryan Pension & Financial Consultants Limited 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.

The third parties that we pass your personal data include:

1.	<b>Insurance Partners</b> where we need to manage the services provided to you such as Product Providers and insurance underwriters. You can refer to their privacy statements on their website for more information about their privacy practices.
2.	<b>Medical professionals</b> , e.g., where you provide health information in connection with arranging an insurance policy or in connection with a claim against your insurance policy; or when we are providing a quote for insurance.
3.	<b>EU Law enforcement bodies</b> , when required to do so by law and/or regulation, or another legal request.
4.	<b>Public authorities, regulators and government bodies</b> , where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity;
5.	<b>Third-party processors:</b> We outsource our processing operations to suppliers that process personal information on our behalf. Examples include IT service providers who manage our IT and back-office systems and telecommunications networks, and accounting and payroll providers, CRM providers.  These processing operations remain under our control and we have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.
6.	<b>Internal and external auditors</b> where necessary for the conduct of company audits or to investigate a complaint.

**Transferring personal data outside of Ireland**

Where we transfer personal data to a country outside of the EEA (referred to in the GDPR as ‘third country,’) we will ensure it is done lawfully, i.e. there is an appropriate “level of protection for the fundamental rights of the data subjects”. We will therefore ensure that either the EU Commission has granted an adequacy decision in respect of the third country, or appropriate specified safeguards have been put in place, (e.g., Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs)).

The EU Commission adopted adequacy decisions for transfers of personal data to the UK. This means that the EU accepts that the UK data protection regime is substantially equivalent to the EU regime and allows personal data to be transferred freely from the EEA to the UK. Therefore, the UK is not deemed a third country. *Similarly, where the EU has adopted adequacy decisions for transfers to other countries outside of the EEA, you can substitute UK for, or add to, the names of those countries.*

### Data Subjects Rights:

Paul Ryan Pension & Financial Consultants Limited facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

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 Paul Ryan Pension & Financial Consultants Limited 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. Paul Ryan Pension & Financial Consultants Limited will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body and our internal governance.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Paul Ryan Pension & Financial Consultants Limited or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Paul Ryan Pension & Financial Consultants Limited data protection representative, Alan Ryan.

### Data Protection Commissioner

Canal House  
Station Road  
Portarlinton  
Co Laois

Phone: +353 57 8684800  
+353 761 104800  
Lo Call Number: 1890 252 231  
Fax: +353 57 8684757  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

### 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

We carry out automatic decision making in the following instances:

a) Risk Profiling

To establish a customer's attitude to investment risk we have automated calculators which calculate your attitude to various levels of risk, this is done following the completion of a risk questionnaire which asks a series of questions.

b) Profiling for marketing purposes.

When we seek to contact you about other services, as outlined above we may run 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.

### **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) 4546730 or email [info@paulryan](mailto:info@paulryan).

### **Privacy policy statement changes**

Paul Ryan Pension & Financial Consultants Limited 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.

*This privacy policy was last reviewed in Oct 2022*

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