

## HC Financial Privacy Statement

HC Financial is committed to protecting and respecting your privacy. It is the intention of this privacy statement to explain to you the information practices of HC Financial in relation to the information we collect about you and other users.

For the purposes of the General Data Protection Regulation (GDPR) the data controller is:

*HC Financial  
Oranmore Business Park  
Oranmore  
Co. Galway*

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?

HC Financial is regulated by the Central Bank of Ireland as an Authorised Advisor under the Investment Intermediaries Act 1995 (as amended). Registered as an Insurance/Reinsurance Intermediary under the European Communities (Insurance Mediation) Regulations, 2005 (as amended). Authorised as an Investment Business Firm under Section 10 of the Investment Intermediaries Act, 1995 (as amended). Investment Product Intermediary - Financial Service Providers holding appointments from IIA product producers, including intermediaries that may issue appointments, appearing in the register maintained under Section 31 of the Investment Intermediaries Act (as amended). Authorised as a Mortgage Intermediary under the Consumer Credit Act, 1995 (as amended). Copies of our Authorisations are available on request. Alternatively, the Central Bank of Ireland holds registers of regulated firms which can be viewed on the website: [www.centralbank.ie](http://www.centralbank.ie). You may contact the Central Bank of Ireland on 1890 777 777 or visit their website to verify our credentials. A copy of our Statement of Authorised Status under the Investment Intermediaries Act 1995 is attached to this document.

Our Compliance Officer can be contacted directly here:

- Olivia Rogers
- [admin@hcgroup.ie](mailto:admin@hcgroup.ie)
- 091-788000

### Purpose for processing your data

#### Why do HC Financial need to collect and store personal data?

In order for us to provide you with financial services and advice, we need to collect personal data for the services we provide. 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 HC Financial would contact you for additional consent.

### **How will HC Financial use the personal data it collects about me?**

HC 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.

HC Financial is 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 HC 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 minimise the risk of unauthorised access or disclosure.

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

Our reason and purpose for processing your personal data is to adequately provide you with the advice and services you request. The processing of this data is integral to the business and contractual needs of the services and products we provide.

### **Special Categories of personal data**

If we collect any special categories of personal data, we will ensure that we will obtain your explicit consent and that the data collected is necessary for the completion of our services.

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

We may pass your personal data on to third-party service providers contracted to HC 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 fulfill 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 HC Financial procedures. 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 legally required to do otherwise.

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:**

HC Financial facilitate the data subject's rights in line with our data protection policy and our subject access request procedure. These are 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 HC Financial refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain by contacting us by e-mail at [admin@hcgroupp.ie](mailto:admin@hcgroupp.ie).

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. HC 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 HC Financial (or third parties), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and HC Financials' Compliance Officer.

#### **Failure to provide further information if needed**

If we are collecting your data for a statutory requirement (payroll) or to fulfill 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.

#### **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.

#### **Responsibilities**

The Compliance Officer is responsible for ensuring that the privacy notice(s) is correct and that mechanisms exist such as having the Privacy Notice(s) on our website to make all data subjects aware of the contents of this notice prior to HC Financial commencing collection of their data.

All staff that need to collect personal data are 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 e-mail at [admin@hcgroupp.ie](mailto:admin@hcgroupp.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”.

### Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 091 788000 or email [admin@hcgroupp.ie](mailto:admin@hcgroupp.ie)

### PRIVACY STATEMENT DECLARATION

I/we have read and understand the HC Privacy Statement, and consent to HC Financial using my/our data in the manner outlined above.

Signed: \_\_\_\_\_

Signed: \_\_\_\_\_

Dated: \_\_\_\_\_

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

Dated: \_\_\_\_\_

Client Executive

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