

Data Privacy Notice/Statement

Introduction

Gainsboro Financial Services Ltd trading as Mc Keigue Kelly & Co (the company) 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 the company in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Gainsboro Financial Services Ltd trading as Mc Keigue Kelly & Co (the company)
- Contact details of 090 9627227
- When we refer to 'we' it is the company

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?

- Gainsboro Financial Services Ltd trading as Mc Keigue Kelly & Co is a multi-agency Brokerage and Financial Services provider. We are regulated by the Central Bank of Ireland (Ref. No. C92674) as an investment business firm under Section 10 of the Investment Intermediaries Act, 1995 (as amended), to provide the services of an investment intermediary and is authorised to receive and transmit orders to product providers from whom a written letter of appointment is held in relation to: 1. Shares in a company or bonds that are listed on a stock exchange, prize bonds. 2. Relevant collective investment scheme instruments. 3. Tracker Bonds. 4. Insurance Policies. 5. Personal Retirement Savings Accounts (PRSA's) within the meaning of the Pensions Act, 1990.

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

- Name: Sean Mc Keigue
- Email address: smckeigue@mkco.ie
- Phone number: 090 9627227

Purpose for processing your data

Why we are processing your data? Our legal basis.

In order to provide you with our services, as outlined above under the section titled "Who we are", it is necessary for us to collect and process your personal data. We are required, therefore,

to inform you of the legal bases for processing your personal data. One such legal basis is that the processing is necessary for the performance of the advisory services contract (and any other contract) that we commit to delivering to you from time to time. Another legal basis is that some processing is necessary for the purposes of the legitimate interest that we have, as a firm that is authorised and regulated by the Central Bank of Ireland, in the proper administration and correct operation of our firm. There may also be circumstances where the legal basis for processing your personal data is consent (where we have sought it and it has been provided to us), in which case that consent may be withdrawn at any time.

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

The Company 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

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to the Company 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 company 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.

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:

The Company 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**
- **Right to judicial review:** in the event that Organisation Name 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. The Company will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (xxx) and our internal governance.

Complaints

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

You may also lodge a complaint with the Data Protection Commission in Ireland, whose details are:

Data Protection Commission
Canal House,
Station Road,
Portarlington,

Co. Laois, R32 AP23
Phone: + 353 57 868 4800 / + 353 761 104 800
Fax: + 353 57 868 4757
Web: www.dataprotection.ie
Email: 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

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Profiling;

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

- a) Risk profiling.
- b) Profiling for marketing purposes.
- c) Establishing affordability and providing quotations for financial services and mortgage product

a) 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.

b) 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.

c) Establishing affordability and providing quotations for financial services products.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 090 9627227.

Privacy policy statement changes

The Company 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 April 2018

Source: Atlantic Compliance Ltd

Atlantic Compliance Ltd are experienced data protection practitioners and all document templates are provided as general guidance.

Users of these documents should consult their own legal advisers for legal advice specific to their own circumstances and Atlantic Compliance Ltd accepts no liability of any sort arising from the use of these templates.
