

MBC Financial Ltd t/a MBC Financial

PRIVACY STATEMENT

1. GENERAL

MBC Financial. provide businesses and individuals with advice on Financial Planning, Life & Pensions, Wealth Management, Business Protection and Family Protection. As part of this financial planning service, we have consistently maintained our strong emphasis on professionalism and personal attention through all of our products, building on our hard-earned reputation for dependability and commitment.

2. PRIVACY NOTICE

This Privacy Notice (together with our Terms of Business) sets out the basis of how any personal data we collect from you, or that you provide to us, or we source from trusted third parties will be processed by MBC Financial. It is the intention of this privacy statement to explain to you the information practices of MBC Financial in relation to the information we gather and how it is used.

3. GDPR

On the 25th of May 2018 the European Union (EU) is introducing a new regulation, the General Data Protection Regulation (GDPR). A key reason for this new law is to strengthen data protection for all within the EU. MBC Financial is a Data Controller under the GDPR. MBC Financial is committed to ensuring personal data shall be:

- processed lawfully;
- collected for specified, explicit and legitimate purposes and is not processed in a manner that is incompatible with these purposes;
- adequate, relevant and limited to what is necessary in relation to purposes for which it is processed;
- accurate and kept up to date;
- kept for no longer than is necessary; and
- is secure.

MBC Financial is committed to respecting and protecting your privacy.

4. DATA PROTECTION OFFICER

MBC Financial has a designated Data Protection area. If you would like to contact us MBC Financial with any queries or comments in relation to your personal data, please:

Send an email to:

alan.mccarthy@mbcfinancial.ie

Send letter to:

Alan McCarthy
MBC Financial
Building 5200
Cork Airport Business Park
Cork
T12 FDN3

Call us on:

+353 (21) 4277910
+353 (87) 7977444

5. WHY DOES MBC FINANCIAL COLLECT MY DATA?

In order to provide appropriate advice and perform transactions on your behalf with Product Producers (Insurance Companies), we need to collect and store personal data, including sensitive information, if applicable. This

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information supplied by you will be used by us to understand your needs and objectives and to enable us to provide specialist advice to you on the products and/or services available to suit your specific requirements. This information may also be used for the performance, administration and management of contracts with Product Producers to which you are a party including pre-contract and claim stage. 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.

6. DATA COLLECTION

In order to ensure we have a complete understanding of your insurance needs and your personal circumstances we may obtain your personal information from a number of sources:

- you, the potential customer;
- you, the current customer;
- persons who may represent you (if applicable);
- insurance companies.

When submitting an application to us for a product, you may provide us with information relating to other persons named under the policy, (e.g., Spouse). You agree that you will bring this Privacy Notice to the attention of each person named on the policy at the earliest possible opportunity. Please also ensure that anyone else who is insured under your policy have agreed to provide their personal information to us.

7. TYPES OF DATA COLLECTED

Data collected may vary depending on the Product Producer requirements. If you are ever concerned about data someone in MBC Financial has requested from you, please do not hesitate to contact our designated Data Protection Office, details of which are set out in Section 4 of this Notice. Types of data collected include the below but not limited to:

Name, address, phone and email	Financial goals
DOB	Occupation
Nationality (ethnic origin)	Income
Marital Status	Financial Information
No. of Dependents & Ages	Property/Investments/ Savings/Loans
Health & Medical Info (for specific policies)	Details of any existing policies
Financial Needs	Declaration

8. UNDER WHAT CIRCUMSTANCES WILL WE CONTACT YOU

The information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. Where you have given your consent to be contacted in relation to marketing/promotion of other relevant services we will contact you only if we believe the service will be of interest or relevance to you.

There will be an opt-out included in all our marketing correspondence so that you can withdraw your consent and/or unsubscribe at any time. This can be done by email, phone or online.

9. THE LEGAL BASIS FOR PROCESSING

MBC Financial will process (collect, use and store) the information you provide in a manner compatible with the EU's GDPR.

The table overleaf sets out the legal bases for data processing activities of your personal data.

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LEGAL BASIS FOR PROCESSING	<i>Compliance with a Legal Obligation</i>	<i>Performance of Contract</i>	<i>Legitimate Business Interests</i>	<i>Consent</i>	<i>Public Interest</i>
• To verify your (or your representative's) identity	<input type="checkbox"/>				
• To verify the accuracy of the information we receive		<input type="checkbox"/>			
• To assess your insurance needs	<input type="checkbox"/>	<input type="checkbox"/>			
• Providing a quotation		<input type="checkbox"/>			
• To manage & administer your policy(ies) &/or manage your portfolio	<input type="checkbox"/>	<input type="checkbox"/>			
• To manage & investigate claims	<input type="checkbox"/>	<input type="checkbox"/>			
• For Marketing Purposes			<input type="checkbox"/>	<input type="checkbox"/>	
• For managing & investigating complaints	<input type="checkbox"/>	<input type="checkbox"/>			
• Governance functions like managing risk, seeking legal advice & auditing	<input type="checkbox"/>		<input type="checkbox"/>		
• Prevention & detection of fraud	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
• For compliance with relevant laws and regulations including sharing information with the Data Protection Commission, the Financial Services Ombudsman, the Central Bank of Ireland.	<input type="checkbox"/>				
• To record calls for security, training & quality purposes			<input type="checkbox"/>		
• To engage in activities to improve our services in order to allow MBC Financial to deliver our business strategy and grow our business			<input type="checkbox"/>		

10. SPECIAL CATEGORIES OF PERSONAL DATA

If it is deemed necessary to collect any special categories of personal data, such as health details or information relating to criminal convictions, we will ensure we will only process what is necessary and proportionate for the purposes of providing an insurance product.

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11. WHO ARE WE SHARING YOUR DATA WITH?

In our capacity as your insurance intermediary, the information you supply to us may be shared in confidence and with regard to the above legal basis with:

- trusted third party service providers appointed by MBC Financial. to help us to process data to execute transactions on your behalf;
- trusted Product Providers with whom you may wish to enter into a contract with;
- any agent authorised by you to act on your behalf;
- regulatory bodies; and
- any third parties that we may share your data with are required to keep your details secure, and to use them only to fulfil the service they provide.

12. RETENTION

To provide appropriate advice and perform transactions on your behalf with Product Producers, we need to collect and store personal data, including sensitive information, if applicable. 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. It is our aim to only hold data for as long as is necessary unless otherwise required under applicable law.

13. DATA SECURITY

MBC Financial has appropriate measures in place to ensure that users' personal details are not misused, accidentally destroyed, lost or altered when we process your data either by electronic or paper means. For more information about our security measures please see our Data Protection Policy, which can be requested by emailing ALAN.MCCARTHY@MBCFINANCIAL.IE.

Occasions will arise when customer information is passed outside MBC Financial to our trusted third-party suppliers, but they will only act upon instruction from MBC Financial in order to perform the services required.

14. DATA SUBJECT RIGHTS

MBC Financial ensures that we facilitate data subject's rights in line with our data protection policy and the subject access request procedure outlined in that policy.

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 MBC Financial refuses 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 below.

The exercise your Right of Access or to update your details under your Right of Rectification or Erasure please email your request to the contact address above with proof of identity. As we have indicated in the processing of your personal data, should there be a third party involved, all of the above requests will be forwarded to the relevant third party.

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15. 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.

16. COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by MBC Financial (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint with the Data Protection Officer of MBC Financial and/or with the Data Protection Commission.

17. FAILURE TO PROVIDE FURTHER INFORMATION, IF NEEDED

If we are collecting your data for a statutory requirement or to fulfil a contract of insurance and you cannot provide this data, the consequences of this could mean the contract cannot be completed.

18. AUTOMATIC DECISION MAKING

As part of securing the best quotation for you, an element of our assessment of your application for insurance is carried out using automated decision making. The results of the automated decision making may limit the products or services that we can provide to you. Where you have any concerns, you are entitled to speak to a member of our staff.

19. UP TO DATE INFORMATION

In order to ensure our records are up to date and accurate or should you wish to amend any personal records, please contact us using the contact information set out in Section 4 of this Notice.

20. MARKETING

If you no longer wish to receive direct marketing from MBC Financial, please contact us using the contact information set out in Section 4 of this Notice.

21. QUESTIONS REGARDING THE PRIVACY NOTICE & CONDITIONS OF USE

If you have any questions about our Privacy Notice, or any concern about privacy at MBC Financial, please do not hesitate to contact us using the contact information set out in section 4 of this Notice.

22. CHANGES TO THIS STATEMENT

We encourage you to check with MBC Financial from time to time as we may make changes to this Privacy Notice. It is your responsibility to review this Privacy Notice periodically so you're aware of any changes.

This notice was updated February 2023