



Privacy Notice For OBN Financial Services

OBN Financial Services 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 issued and on our website.

This Privacy Notice will inform you of the information we gather and how it is used. OBN Financial Services 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.

For the purposes of the GDPR the “Data Controller” “Data Protection Officer” and “GDPR Owner” is:

- OBN Financial Services, 10 Bridgelane, Carrick on Shannon, Co Leitrim
 - Louise O’Donnell
- Contact details: louise@obn.ie / 071 9671522
- When we refer to ‘we’ or ‘our’ it is OBN Financial Services

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:

OBN Financial Services is regulated by the Central Bank of Ireland (C38771). We are authorised as an Insurance Intermediary registered under the European Union (Insurance Distribution) Regulations, 2018; and as an Investment Intermediary authorised under the Investment Intermediaries Act, 1995 and such Acts as amended.

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Life, Pensions, Savings & Investment products. To provide you with relevant information and suitable product we may request that you provide us with information about yourself, both personal and financial and medical related information.

OBN Financial Services complies with EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data.

How do we collect data?

The personal information we collect varies depending upon the nature of our services. This information is collected via our website or by asking you to complete paper based or electronic forms. When you apply for a product or service and during the term of the product or service we may carry out searches to verify your identity.

We need your consent to use your personal information or contact you, such as in the case of direct marketing, we may obtain this in writing, by phone, by post, by email, by text message or through other digital means.

Our organisation collects personal data in the following ways, if you:

- request a service from us; We provide insurance products to customers and in order to complete those tasks we are required to ask questions and store information on your personal, financial and health situation.
- register with or use any of our websites or online applications;
- use our website/apps and it installs cookies or other tracking technologies onto your device. Details of visits to this website - information collected through cookies and other tracking technologies such as your IP address, domain name, browser version, operating system, traffic data, location data, web logs and other data such as the pages you accessed. In general, you may visit our website without identifying yourself or revealing any personal information.
- engage with us on social media; *we use LinkedIn, and Facebook.*
- To contact us with a complaint or query.

- To apply for a position with us;

What information do we collect?

- **Contact and Identifying Information** – your name, address, telephone numbers, email address.
- **Unique Identifiers** – PPSN (For pension purposes we are required to obtain this information, we cannot proceed with some products without it) Existing Insurance policy numbers/reference numbers – if we are reviewing or comparing existing products we need to collect information from other companies to assess the suitability.
- **Demographic Details** - age, gender, marital status, lifestyle, and insurance requirements; date of birth, dependents, photo ID, as well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. E.g., your children/spouse
- **Family and Beneficiary Data, e.g.**, dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant.
- **Employment information** e.g., role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history; This information is necessary for our Fact Find with our clients.
- **Publicly available sources:** e.g., Information about you in the public domain such as Director information from the Companies Registration Office – We use Vision NET for this purpose.
- **Health information** such as information about your health status, medical records and medical assessment outcomes; We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol), medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information.
- **Pensions and Insurance Benefits information** such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, PAO.
- **Financial details** e.g., bank account details, details of your credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details.
- **Claims Data** (From you and any relevant third parties).
- **Marketing preferences:** we will only send you direct marketing if you explicitly consent, this question is on the factfind.
- **Online information:** e.g., information about your visits to our websites
- **Events information** e.g., information about your interest in and attendance at our events, including provision of feedback forms;
- **Social media information** (e.g., likes and posts) with our social media presence; this includes, LinkedIn, Twitter, Facebook please.
- **Searches** that we undertake in relation to sanctions, money laundering and credit checks.
- **Calculators on our website.** We use this data to perform calculations to prepare quotations for life insurance or mortgages. *We currently have no calculators on our website but and details we request will be basic in order to get the result needed and initiate conversation.*

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

Information we automatically collect.

We sometimes automatically collect certain types of information when you visit our websites and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your expressed consent. www.obn.ie

How we use your information?

- **Performing services for our clients and prospective clients** – when you require insurance/investment products, we use your data to enable us to provide the required product.

- **Statutory and other regulatory requirements** – we are required to carry out various obligations which include:
 - AML/Sanction checking
 - Knowing your customer “Fact Find”
 - Adherence to the Consumer Protection Code
- **Communicate and marketing to you** – we rarely do direct marketing, and our primary way would be via our social media. Our website is used for “presence” purposes.
- **Process Claims** – This task requires both financial and health information – a claim form containing information must be sent to the life company in question to process the claim. Further information may be looked for, but this will go direct to GP’s/Specialists. It would be rare but not uncommon that we would receive detailed medical information to pass to the company.
- To **monitor usage of the website**, site including data analysis, testing, research, statistical and survey purposes
- To communicate with you. By supplying your contact information and ticking the applicable box on our website or in our financial factfind (data protection consent) you are consenting to us contacting you:
 - To provide products and services
 - To protect both our interests
 - To respond to your queries or make recommendations to you
 - To conduct business
 - To market our services to you
 - To fulfil our obligations to provide you with a service, which may involve us passing your information to third parties.
 - To meet our legal and regulatory obligations

OBN Financial Services 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. We will only request enough information that allows us to provide a product or service.

Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data.

Performance of a contract	When we enter a contract with you, we will collect and use your personal data to enable us to fulfil that service.
Legal obligation	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.
Consent	<p>Sometimes we may rely on consent as a legal basis for processing your information. For example, we rely on consent to collect and use personal data for any criminal convictions or alleged offences. This is used when we need to assess risk relating to an insurance policy for you. We share this information with other third parties where it is necessary to manage these services provided to you – these services include insurance underwriters, reinsurer and other insurance providers.</p> <p>We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time.</p> <p>Sometimes if you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.</p>

Legitimate interests	<p>If your organisation relies on legitimate interest for direct marketing, please include this here. You <u>cannot</u> rely on legitimate interest if you are marketing by electronic means (e-marketing), e.g. by email, SMS text, or telephone, other than in very limited circumstances: by email to existing customers where certain criteria <u>must</u> apply.</p> <p>For marketing other than e-marketing, where you are relying on legitimate interest, include the fact that your organisation has carried out a legitimate interest assessment where you have balanced the rights and freedoms of individuals.</p> <p>Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.</p>
Vital interest	<p>Processing data and using vital interests are intended to cover only interests that are essential for someone's life. So, this lawful basis is very limited in its scope, and generally only applies to matters of life and death.</p>

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

How we share your data

When required, 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. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting procedures in place for storage, retention, deleting information etc..

1.	Insurance Partners where we need to manage the services provided to you such as Product Providers and insurance underwriters, and reinsurers. You can refer to their privacy statements on their website for more information about their privacy practices. Each company has a website and at the bottom of the page will be their "Privacy Statement". Eg. Zurich Life www.zurichlife.com – Please contact info@obn.ie for the direct link to the company you are looking for.
2.	Vetting and risk management agencies such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the services. Vision NET & EU Sanctions List again Please contact info@obn.ie for the direct link to the company you are looking for.
3.	Legal advisers: where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature;
4.	Medical professionals , e.g., where you provide health information in connection with a claim against your insurance policy; or when we are providing a quote for insurance.
5.	EU Law enforcement bodies , when required to do so by law and/or regulation, or another legal request.
6.	Public authorities, regulators and government bodies , where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity;
7.	Third-party processors: 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.
8.	Internal and external auditors where necessary for the conduct of company audits or to investigate a complaint or security threat.

Transferring personal data outside of Ireland

OBN Financial Services Ltd does not knowingly transfer data outside of the EEA.

We do not knowingly share data with companies in the UK. Where it happens 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.

Security

The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration, and destruction.

Retention

OBN Financial Services shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

OBN Financial Services may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

The retention period for each category of personal data will be set out in our Retention Policy along with the criteria used to determine this period, including any statutory obligations we have. Should you require further information we would be happy to provide.

Personal data will be disposed of securely.

Data Subjects Rights:

OBN Financial Services will facilitate your 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 make a complaint**

- **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.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by OBN Financial Services or how your complaint has been handled, you have the right to lodge a complaint internally with OBN Financial Services directly and failing a satisfactory response you may also lodge a complaint with the Data Protection Commission in Ireland, whose details are:

Internal Contact: GDPR Owner: Louise O'Donnell (OBN Financial Services) info@obn.ie / 0719671522

External Contact: Data Protection Commission (21 Fitzwilliam Square South, Dublin 2. D02RD28)
Web: www.dataprotection.ie Email: info@dataprotection.ie

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. When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

Profiling – automatic decision making.

If you carry out automatic decision making you need to inform the data subject -you need to explain the significance and the envisaged consequences involved. You also need to inform the data subject that they can object to this.

An automated decision is when we input your personal data into a computer programme and this programme analyses your personal data to provide us with a result. There is no human involvement in the decision making. OBN Financial Services use this feature for quoting for products and services. If a decision is taken by automated means, you have the right to object to this and ask us to reconsider the service you have asked us to provide.

Example's Include:

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 – Insurance products requires quotes to be completed first before we agree business. Basic Information is needed for this initially.

Bankruptcy check – We are required for certain products to make sure we adhere to AML/CTF legislation.

PEP check - We are required for certain products to make sure we adhere to AML/CTF legislation.

Special Categories of personal data

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health / Financial data, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for insurance and pension purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

- a policy of insurance or life assurance,
- a policy of health insurance or health related insurance
- an occupational pension, a retirement annuity contract, or any other pension arrangement

Data Security

OBN Financial Services' intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect online, including the use of encryption when collecting or transferring sensitive data such as credit card information.

However, you should always take into consideration that the internet is an open forum and that data may flow across networks with little or no security measures, and therefore such information may be accessed by people other than those you intended to access it.

How to update and/or amend the personal information you have provided

You are entitled to know whether we hold information about you and, if we do (subject to certain limitations), to have access to that information and have it corrected if it is inaccurate or out of date. To exercise your Right of Access or to update your details under your Right of Rectification or Erasure please email or write your request to the contact address below with proof of identity.

Business Relationships

The website may contain links to other websites. OBN Financial Services is not responsible for the privacy practices or the content of such websites. OBN Financial Services uses pixels, transparent GIF files and other methods to help manage online advertising.

Contacting Us

If you have any questions or comments about our privacy notice or practices, please contact us. GDPR Owner is Louise O'Donnell - info@OBN.ie / 071 9671522

OBN Financial Services may modify or update this privacy notice from time to time at any time without prior notice. You can check the "Last Updated" date at the top of this document to see when the notice was last changed. We encourage you to check this notice often so that you can continue to be aware of how we are protecting your personal information. Your continued use of our website and Company constitutes your consent to the contents of this privacy notice, as it may be modified from time to time.

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