

# Privacy Statement

## Introduction

Brazil Financial 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 Brazil Financial in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Brazil Financial
- Contact details: 01 5571596, eoin@brazilfinancial.ie
- When we refer to 'we' it is Brazil Financial

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?

*Following years of extensive experience in the Financial Services sector, Rory Brazil set up Brazil Financial in 2009.*

*The business specialises in providing independent financial advice to business owners, families and individuals in the areas of Investments, Pensions, Income Protection and Life & Specified Illness Cover.*

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

- Name: Eoin Byrne
- Email address: eoin@brazilfinancial.ie
- Phone number: 01 5571596

## Purpose for processing your data

- *You need to be clear about your use of client's data and the consequences/risks to them of processing their data.*
- *You will need to outline what and how information is going to be processed.*
- *This is to make sure the individual knows exactly what is going to happen to their information and how it is going to be used. You shouldn't be doing anything with personal data unless the individual is made aware.*

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

In order for us to provide you with any of our services- Pension, Investment, Assurance & Mortgages, Brazil Financial need to collect personal data in order to give suitable *advice on any of the aforementioned services*. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – Brazil Financial 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.

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

Brazil 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.

## 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?

Depending on the service you wish to avail of, your personal data may be shared with any one of more of the below companies with whom we have agencies with;

Central Bank of Ireland Reference Number	Provider Name
C46386	Aviva Life & Pensions Ireland Limited
C725	Royal London
C2117	Irish Life
C787	New Ireland Assurance Co plc
C810	Standard Life Assurance Co
C757	Friends First Life Assurance
C775	J & E Davy
C741	Cantor Fitzgerald Ireland Ltd
C131780	Blackbee Investments Ltd
C31450	Wealth Options Limited
C744	Zurich Life Assurance plc
C2448	BCP Asset Management DAC
C90996	Conexim Advisors Limited

C35544	Independent Trustee Company Limited
C45642	Newcourt Retirement Fund Managers Limited
C12675	IFG Investment & Mortgage Services Ltd
C41235	Brokers Ireland Network Services Limited
C8152	MMPI trading as Broker Solutions

We may pass your personal data on to third-party service providers contracted to Brazil 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 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 Brazil 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 explicit consent, unless we are legally required to do otherwise.

The third parties that we pass your personal data to are:

- One Platform (for the purposes of mortgage advice and to act as intermediary with our chosen mortgage lenders)
- Best Advice (who administer our Customer Relationship Management(CRM) system)
- Diacom(Our I.T provider who handles our client data(cloud) storage.
- Mailchimp (for the purposes of newsletter and client communications by email)

We have issued all our third party processors with a Data Processor checklist asking them GDPR specific questions

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:**

Brazil Financial 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** – 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 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. Brazil Financial will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank of Ireland) and our internal governance.

#### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Brazil Financial) or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Brazil Financials' data protection representatives Data Protection Officer / GDPR Owner

#### **Failure to provide further information**

If we are collecting your data for a specific 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.

- a) 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) 5571596 or email [eoin@brazilfinancial.ie](mailto:eoin@brazilfinancial.ie)

### **Privacy policy statement changes**

Brazil Financial 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.

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