



August 2022

## Privacy Statement – Kevin Durcan Financial Steps Ltd

### Introduction

Kevin Durcan Financial Steps Ltd 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 Kevin Durcan Financial Steps Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Kevin Durcan
- Contact details are as follows:
- Email: [info@financialsteps.ie](mailto:info@financialsteps.ie)
- Tel: 087-2455998

### When we refer to 'we' it is Kevin Durcan Financial Steps Ltd.

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?

Kevin Durcan Financial Steps Ltd. is a Mayo based brokerage and is regulated by the Central Bank of Ireland, C183201. Our registered address is Aghalusky, Castlebar, Co. Mayo. We are focused on providing quality financial advice to our clients and offer advice on a range of different financial products. The main categories of financial products we provide advice on are as follows:

- Pension products
- Protection products
- Investment & Savings products
- Mortgages

In addition to this, Kevin Durcan Financial Steps Ltd also provide a Financial Planning Service where we analyse in depth your current financial position and how to augment it going forward.

We at Kevin Durcan Financial Steps Ltd respect your right to privacy and comply with our obligations under the General Data Protection Regulation 2016.



Our GDPR Owner and data protection representatives can be contacted directly here:

- Kevin Durcan (Director)
- Email: [info@financialsteps.ie](mailto:info@financialsteps.ie)
- Tel: 087-2455998

### **Purpose for processing your Data**

We will process any Personal Data you provide to us for the following purposes:

- To provide you with information about financial products in the market and/or about the services offered by Kevin Durcan Financial Steps Ltd.
- To process on-line application forms submitted to us for the purposes of providing financial products. Any applications submitted online or by e-mail will be subject to the same terms and conditions as those completed by hand in paper form including additional terms and conditions relating to credit reference checking, money laundering and regulatory notices.
- To contact you if required in connection with your account or enquiry and to respond to any communications you might send us.
- Managing our relationship with you (for example, updating you on changes to our business or updating your record with us if you change your address etc.)
- Responding to any complaints you might have.

In order for us to provide our clients with a comprehensive Summit Life & Pensions service, we collect personal data from the client:

### **Personal Data**

This is the data that identifies you as a natural person (data subject); or can be used to identify or contact you and may include your name, address, telephone numbers, e-mail addresses, online identifier and date of birth or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special types of personal data include revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data, for the purpose of, uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.



## 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

## What do we consider Data Processing?

We consider any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means or not, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction as data processing.

## Disclosure of Information to Third Parties:

We will not disclose your Personal Data to third parties unless you have consented to this disclosure or unless the third party is required in order to process an application or other communication from you or to perform the services that you have applied for. We will however disclose your Personal Data if we believe in good faith that we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

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

In order for us to provide you with Financial Advice, Kevin Durcan Financial Steps Ltd. Needs to collect personal data for one, or all, of the following:

- The establishment of your Financial position
- The creation of your personalised Financial Plan
- The provision of Financial Advice
- The recommendation of financial product(s)

Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – Kevin Durcan Financial Steps Ltd 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, Kevin Durcan Financial Steps Ltd 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.

### **Date Subjects Rights:**

Kevin Durcan Financial Steps Ltd 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.

Kevin Durcan Financial Steps Ltd are providing you with additional information to ensure that we are transparent and fair with our processing and retention of your personal data.

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Kevin Durcan Financial Steps Ltd will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory bodies which includes; The Central Bank of Ireland, the Officer of the Financial Services and Pensions Ombudsman, the Competition and Consumer Protection Commission and our Internal Governance.



## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Kevin Durcan Financial Steps Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Kevin Durcan Financial Steps Ltd data protection representatives and GDPR Owner, Kevin Durcan.

- Email: [kevin@financialsteps.ie](mailto:kevin@financialsteps.ie)
- Tel: 087-2455998
- Kevin Durcan Financial Steps Ltd, Aghalusky, Castlebar, Co Mayo.