

Privacy Notice

Who We Are

CML Financial Limited trading as CML Financial ('we', or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and law. This privacy notice provides you with the necessary information regarding your rights and obligations, and explains how, why and when we collect and process your personal data.

CML Financial Limited trading as CML Financial registered office is at The Business Centre, Lisfannon, Buncrana, Co Donegal and has a sub office at 3 Stephen Street, Sligo. Our designated Data Protection Officer/Compliance Officer is Ms Alice Lynch and we can be contacted at **The Business Centre, Lisfannon, Buncrana, Co Donegal 074-9364255 and 3 Stephen Street, Sligo 071-9145016.**

CML Financial Limited trading as CML Financial 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 at www.cmlfinancial.ie

Our Principal business is to provide advice and arrange transactions on behalf of clients in relation to Life, Pensions, Mortgages, Savings and Investments. In order to provide you with relevant information, to respond to your requests we sometimes request that you provide us with information about yourself.

CML Financial Limited trading as CML Financial maintains the same privacy practices with respect to data that is collected off-line and on-line. CML Financial Limited trading as CML Financial complies with EU General Data Protection Directive (GDPR) for the collection, use and retention of all personal data.

Information That We Collect

CML Financial Limited trading as CML Financial processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

We collect information in the below ways: -

- During our getting to know the client factfinding process
- During client meetings
- Online forms
- Request a service from us
- Use our website/apps and it installs cookies or other tracking technologies onto your device
- Engage with us on our Facebook social media page
- Contact us with a complaint or query

The type of personal data that we collect is as follows: -

1.	Contact and Identifying information , e.g., name, address, contact details; email, mobile, landline
2.	Unique identifiers e.g. <ul style="list-style-type: none"> • PPS number – the reason why we collect your PPS number is for policy application purposes • pension scheme reference number- the reason why we collect this is with your permission we can access information on your existing policies and if required for an application process. • insurance policy numbers, the reason why we collect this is with your permission we can access information on your existing policies and if required for an application process.
3.	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
4.	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.
5.	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.
6.	Publicly available sources: e.g., Information about you in the public domain such as Director information from the Companies Registration Office.
7.	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. We collect this information for policy applications like life cover, specified illness, income protection etc.
8.	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.
9.	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.
10.	Claims Data (From you).
11.	Marketing preferences: <i>we will only send you direct marketing if you explicitly consent.</i>

12.	Online information: e.g., information about your visits to our websites; please refer to our Cookie policy.
13.	Social media information (e.g., likes and posts) with our social media presence; this includes - Facebook and LinkedIn.
14.	Searches that we undertake in relation to sanctions, PEP, money laundering and credit checks. We use Money Advice and Vision Net search providers.

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.

In general, you may visit our website without identifying yourself or revealing any personal information. CML Financial Limited trading as CML Financial collects domain information from your visit to customise and improve your experience on our website. The website may collect certain information from your visit, including the date and time of your access, the pages you have accessed, the name of the Internet Service Provider and the internet Protocol (IP) address by which you are accessing the Internet, and the Internet address from which you linked to our site, if applicable. We use this information to better understand how our website is being used so that we can improve its performance. Some portions of this website may request that you give us information about yourself, from which we are able to identify you, such as your name, email address, your contact number and nature of your query.

How We Use Your Personal Data

Generally, we may collect your data for one or more of the reasons based on below;

- 1) To respond to your request(s) for advice or products or queries in relation to same.
- 2) Reviewing your financial and or mortgage position or products as is prudent or required.
- 3) To recommend products that protect your lifestyle e.g. protecting your family (including mortgage) in the event of death.
- 4) Planning your financial future e.g. retirement funding, savings and investment options.
- 5) 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 Consumer Protection Code.
- 6) Process any claims – such as life cover, specified illness, income protection and or retirement claims.

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 - 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.

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.

CML Financial Limited trading as CML Financial is regulated by the Central Bank of Ireland

CML Financial Ltd T/A CML Financial takes your privacy very seriously and we will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purposes specified in this notice.

When we collect information about you, we intend to tell you why we are asking for the information and what we intend to do with it. You will have the option of not providing the information, in which case you may still be able to access other parts of our website, although you may not be able to access certain services. In certain areas of our website or on documentation, we may, where appropriate, enable you to 'opt in' to certain uses of your information e.g. personal data and direct marketing. general client details will be held while you are a client.

The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to verify your identity, send you information or contact you in relation to a product or service that you are using or that we believe may be of interest to you after you have chosen to 'Opt in'.

Sharing and Disclosing Your Personal Information

In certain instances, 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 with information that is necessary for them to perform the services and we take measures to protect your information. All processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

The information we collect may be subsequently used, stored and processed in the EU, UK, United States, Switzerland or in any other country in which CML Financial Limited trading as CML Financial does business. By providing the information to us, you are consenting to the transfer of the information outside of your country to any country as may be appropriate (including countries which may not have adequate levels of protection)

CML Financial Limited trading as CML Financial may disclose information it has collected about you on the website or otherwise if required to do so by law or when necessary to protect the rights of CML Financial Limited trading as CML Financial or its employees.

Data Subjects Rights

CML Financial Limited trading as CML Financial facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure.

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:** if 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.

You have the right to access any personal information that CML Financial Ltd processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to update/correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the relevant request; this is to ensure that your data is protected and kept secure.

You have the right to access any personal information that CML Financial Limited trading as CML Financial processes about you and to request information about:

If we receive a request from you 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 provided with proof of identity.

Profiling – Automatic Decision Making

Financial and mortgage advisors use profiling in their business.

The main categories are:

- Risk Profiling
- Profiling for marketing purposes
- Establishing affordability and providing quotations for financial services and mortgage product

Risk Profiling

To establish a client's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the clients attitude to various levels of risk having answered a series of questions.

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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 and mortgage product

Our Regulator, The Central Bank of Ireland, requires that we establish a client's ability to afford the cost of a financial or mortgage product before proceeding with a transaction. We have automated processes which assist us profile and calculate a client's net disposable income from the information that clients provide to us in relation to their gross income, family expenses, taxation and commitments etc

Additionally, we have automated processes that enable us to calculate the costs of products including protection insurances and mortgages. These costs can vary between clients depending on matters such as age, term of a proposed product, type of product and product features. A client's health may also have a bearing.

Business Relationships

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

Safeguarding Measures

CML Financial Limited trading as CML Financial takes your privacy seriously and we take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction through appropriate technical and organizational measures including; but not necessarily limited to, SSL, encryptions, pseudonymisation, practices, restriction, IT, authentication.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to CML Financial Limited trading as CML Financial however, as this information is required for us to provide you with our services and products, we will not be able to offer some/all of our products or services without it.

How Long We Keep Your Data

CML Financial Limited trading as CML Financial retains your personal data for as long as is necessary to provide you with our services as our client. We will process personal data in accordance with our retention schedule and in keeping with our obligations under law.

Special Categories Data

CML Financial Limited trading as CML Financial sometimes need to request sensitive personal information from you to provide you with quotations and /or apply for protection cover, a mortgage, savings and investments. Where we collect sensitive personal data, we will only request the information required for the specified purpose.

Lodging A Complaint

CML Financial Limited trading as CML Financial only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with:

Ms Alice Lynch
CML Financial Limited
The Business Centre, Lisfannon, Buncrana, Co. Donegal
Tel: (074) 9364255

and or the supervisory authority.

Data Protection Commissioner,
Canal House, Station Road, Portarlinton, Co. Laois, Ireland R32 AP23
Tel: +353 (0) 57 8684800
info@dataprotection.ie

Changes to our privacy notice

CML Financial Limited trading as CML Financial may modify or update this privacy notice from time to time without prior notice. 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 content of this privacy notice, as it may be modified from time to time.

This Statement was last updated on **23 February 2024. V3**