

# Data Privacy Notice

## Introduction

Gammell Financial Services Limited t/a The Mortgage Mentor 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 (General Data Protection Regulations) 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 Gammell Financial Services Limited in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Lorna Gammell, Director of Gammell Financial Services Limited t/a The Mortgage Mentor
- Contact details of Lorna Gammell:  
Locachanty,  
Burnaby Park  
Greystones  
Co. Wicklow  
Ph: 0402 91900 / 01 2 876 345  
Mobile: 086 8099 788  
Email: lorna@gammellfinancial.com
- When we refer to 'we' it is Gammell Financial Services Limited t/a The Mortgage Mentor

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?

We operate a full professional and comprehensive service in a highly confidential manner.

We are experienced in packaging mortgage applications in a manner as required by the lenders and we will guide you through the entire Mortgage process from Application to Cheque Issue.

We design comprehensive packages to protect you in the most important areas of your life: Mortgage Protection, Life and Specified Illness Cover, Income Protection and Pensions.

We are Qualified Financial Advisors and can advise on:

- Mortgages
- Life Assurance
- Specified Illness Cover
- Income Protection
- Pensions
- Deposits
- Investments
- We are Mortgage Protection Specialists

we have a diverse range of products available to offer you a product to suits your needs.

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

- Data Protection Officer: Lorna Gammell
- lorna@gammellfinancial.com
- Ph: 0402 91900 / 01 2 876 345  
Mobile: 086 8099 788

## Purpose for processing your data

*We will collect and share your personal and sensitive data with relevant 3<sup>rd</sup> parties with whom we hold an agency to do business with in order to process your service request, be it a mortgage application, life insurance, protection product, pension, investment or a deposit.*

*Personal and financial data will be provided to the lending companies*

*Personal and health data will be provided to the life companies*

*Personal data and source of funds will be shared with the investment / deposit companies*

*\*\*The data shared with these 3<sup>rd</sup> parties will only be information that they require in order to facilitate the underwriting and approval of the product requested on your behalf.*

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

In order for us to process your application Gammell Financial Services Limited t/a The Mortgage Mentor need to collect personal data. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** - Gammell Financial Services Limited t/a The Mortgage Mentor needs to process your data as this is necessary in relation to the service you require.

In any event, Gammell Financial Services Limited t/a The Mortgage Mentor 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 Gammell Financial Services Limited t/a The Mortgage Mentor use the personal data it collects about me?

Gammell Financial Services Limited t/a The Mortgage Mentor 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?

As advised above we will only provide your relevant personal and sensitive data with 3<sup>rd</sup> party companies with whom we hold an agency with and with whom we are presenting your application too in order to provide you with the product you have requested. We will not be sharing your data with any firm with whom we do not hold an agency with. Nor will your data be shared with any company outside the EU.

Your personal and sensitive data will be protected and we will endeavour to keep your details up to date.

We do not have any national or international department within our firm, nor do we have any other departments with whom your data will be shared with in house, no cross departmental sharing of information will occur.

Where 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:

- Mortgage Lenders
- Life Companies
- Deposit Holders

#### Data Subjects Rights:

Gammell Financial Services Limited t/a The Mortgage Mentor will 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 Gammell Financial Services Limited 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. Gammell Financial Services Limited will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body The Data Protection Commissioner and our internal governance.

##### Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Gammell Financial Services Limited t/a The Mortgage Mentor or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Gammell Financial Services Limited t/a The Mortgage Mentor data protection representatives;



### Failure to provide further information

If we are collecting your data for a specific application and you cannot / will not provide this data: the consequences of this could mean the service you requested cannot be completed or details retained on your file will be 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 customer's 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.

- c) 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 to you 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 0402 91 900 or email [lorna@gammellfinancial.com](mailto:lorna@gammellfinancial.com)

### Privacy policy statement changes

Gammell Financial Services Limited t/a The Mortgage Mentor 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.

*This privacy policy was last reviewed in April 2018*