PRIVACY NOTICE

DAVIS
Financial Services

Who we are:
Davis Financial Services Ltd
Main Street, Ferns, Enniscorthy, Co. Wexford
T: (053) 9367100 E: info@davisfinancial.ie

Where do we process personal data?
Davis Financial Services stores and process personal data in Ireland.

Purpose of the processing:
Davis Financial Services process personal data for the following purpose(s):

- General provision of insurance/investment and mortgage products and or financial advice (performance of a contract).
- Disclosure to regulatory bodies for the purposes of monitoring and/or enforcing the firm's compliance with any regulatory rules/codes.
- Client administration
- Direct Marketing
- Legal obligations
- Employee administration
- Monitoring (web history, Apps, Cookies)
- Processing for a third party
- Davis Financial Services will process information about you, your directors, officers employees and your beneficial owners (if applicable) in order to carry out anti-money laundering checks and related actions which Davis Financial Services considers appropriate to meet any legal obligations imposed on it, or to pursue the firm's legitimate interests, or public interests in relation to the prevention of fraud, money laundering, terrorist financing and to prevent the provision of financial services to persons who may be subject to economic sanctions.

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
- ensure the personal data is necessary for employment rights or obligations;
- protect the vital interests of the data subject, including the protection of rights and freedoms;
- Only obtain information that is necessary for the legitimate activities with appropriate safeguards;

- **The legal basis for this processing is:**
- Express consent from clients. Where you have provided your consent to processing (e.g. to receive information about products and services which may be of interest to you), you may withdraw your consent at any time by contacting Davis Financial Services at info@davisfinancial.ie.
- Performance of a contract to provide you with financial services and financial advice.
- Legal obligations: To retain AML and other records of individuals to assist with subsequent screening of them, including in relation to investment, insurance, or other services provided by Davis Financial Services. Davis Financial Services is required through various legislation to retain client information for specified periods. Where Davis Financial Services requires your personal information to comply with AML or other legal requirements, failure to provide this information means Davis Financial Services may not be able to provide the services you request.

Recipient(s) of the personal data:
Davis Financial Services may disclose your personal data as follows:

- To third party agencies in order to carry out money laundering and identity checks and comply with legal obligations
- To Davis Financial Services affiliates and third-party vendors in order to process the data for the above-mentioned purposes
- To competent authorities, courts and bodies as required by law
- We may pass your personal data on to insurance companies while we are in the process of carrying out the activities mentioned previously. 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 their own GDPR compliant procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise

Details of transfers to third country/countries:

The disclosure of personal information to the affiliates and other third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (EEA).

By providing your information, you are consenting to the transfer of the information outside of your country to any country (including countries which may not have adequate levels of protection).

Davis Financial Services may disclose information it has collected about you if required to do so by law or when necessary to protect the rights of Davis Financial Services or its employees.

Data Retention period:

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Davis Financial Services will process personal data in accordance with our retention schedule. This retention schedule has been governed by the Central Bank of Ireland and our internal governance policy.

Your rights:

You have the following rights in respect to the personal data that Davis Financial Services holds on you. Please contact us at the address above in order to exercise any of these rights:

1. The right to be informed: You have the right to receive "fair processing information".

2. The right of access: You have the right to obtain:
    - Confirmation of your personal data being processed
    - Access to a copy of your personal data
    - And any other supplementary information

3. The right to rectification: You have the right to have your personal data corrected if it is inaccurate or incomplete

4. The right to erasure (includes withdrawal of consent): You have the right to have your personal data erased, in the following circumstances:
    - You withdraw consent.
    - The personal data has to be deleted to comply with a legal obligation.
    - The personal data was unlawfully processed.
    - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected.
    - Where you object to the processing and there is no superseding legitimate requirement to continue the processing.
    - The personal data is processed in relation to the offer of "information society services" to a child.

5. The right to restrict processing: You have the right to 'block' or suppress processing of personal data

6. The right to data portability:

7. The right to object: You have the right to object to:
    - Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
    - Direct marketing (including profiling).
    - Processing for purposes of scientific/historical research and statistics.

8. Rights in relation to automated decision making and profiling: You have the right not to be subject to a decision when:
    - It is based on automated processing.
    - It produces a legal effect or a similarly significant effect on the data subject.

The right to complain:

If you feel that Davis Financial Services has not fulfilled its obligations under the General Data Protection Regulation 2016/679, then you have the right to lodge a complaint with the Data Protection Commissioner (DPC) at www.dataprotection.ie

Effective Date: May 2018

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