

## PRIVACY NOTICE

### Introduction

Frank Lenny Financial Services Limited T/A Lenny 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 General Data Protection Regulation 2016 (GDPR) in relation to not only processing your data but ensuring you understand your rights as a client. This privacy notice explains when and why Lenny Financial collects personal data, how it is used, the condition under which it may be disclosed to others and how it is kept secure.

### Who we are

We are Frank Lenny Financial Services Limited T/A Lenny Financial and we are an insurance and mortgage intermediary.

We are regulated by the Central Bank of Ireland for the following activities:

- as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations, 2018,

For the purposes of Frank Lenny Financial Limited is the data controller and our contact details are:

**GDPR Owner:** Michael Lenny

**Address:** Mortgage House, 66 South William Street, Dublin 2.

**Telephone:** 01 6703655

**Email:** info@franklenny.com

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on the details provided above.

### What personal information do we collect and why?

We collect data about you when you apply for our services and for products provided by product providers with whom we have an agency agreement. Data is collected to provide you with our services, to open accounts with product providers, or to arrange products with them, and to comply with relevant laws and regulations,

Data is retained and processed to provide you with one of our services, and to comply with relevant laws and regulations, including internal operating procedures and compliance checks.

Frank Lenny Financial Services Ltd. T/A Lenny Financial is regulated by the Central Bank of Ireland. Registered in the Republic of Ireland. Reg no. 310795. Registered Office; Mortgage House, 66 South William Street, Dublin D02 FT51. A private company limited by shares and having a share capital. Managing Director: Michael Lenny QFA CUG CUC.

We may collect data under a number of categories, including:

- Identification & Contact Information, including your Name, Date of Birth, Gender, Marital Status, PPS Number, Address, Email Address, Home Phone Number, Work Phone Number, Mobile Number
- Financial Details & Financial Information, including your Occupation, Job Title, Total Remuneration, Employment Details, Existing Pension Benefits, Employer Name, Bank Details, Tax Residence, your Income, Assets and Liabilities including savings and investments and loans.
- Health information such as information about your health status, medical records and medical assessment outcomes. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information
- Pensions Benefits information such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions

When we collect sensitive personal data as defined within the GDPR, such as health information, we will ensure that we require this information, and that we have your explicit consent and/or authorisation prior to our collection.

#### Information we automatically collect.

We sometimes automatically collect certain types of information when you visit our website and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your express consent. Further information about our use of cookies can be found in our Cookie Notice at the footer of our web page.

#### Our lawful 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:

- To provide the service(s) we have contracted to provide to you;
- To comply with a legal or regulatory obligation such as e.g. the requirement to carry out anti-money laundering customer due diligence;
- To protect our legitimate interest to do so



Where we collect sensitive personal data such as health information we can only do so on receipt of your explicit consent. We may also rely on your consent to send direct marketing information 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.

The consent for the lawful basis for controlling and processing (i.e. collecting, storing & using) your personal information is given when you apply for our services and/or products of our product providers and enter into a contract with us to provide you with services.

We also have a legal obligation to control and process your personal information to comply with Central Bank of Ireland regulations and other legislative and regulatory requirements, for which you also give consent when you agree to our Terms of Business.

### Sharing your data

We will keep your personal data confidential but may pass it on to third-party services contracted to Frank Lenny Financial Limited 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 our or your behalf.

We may also share your data with regulatory and other governmental bodies where required by or under any enactment or rule of law or court order, including, but not limited to, the Revenue Commissioners, An Garda Síochána, the Companies Registration Office, the Financial Services & Pensions Ombudsman or the Central Bank of Ireland.

If we transfer personal data to a third party or outside the EEA, 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. We do not currently transfer personal data outside of the EEA.

### What are your rights around data?

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 details of and/or 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 Frank Lenny Financial Limited refuses your request under rights of access, we will provide you with a reason 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.

### **How long do we hold personal information for?**

We retain personal information for only as long as we are required to or to provide the service(s) you have asked us to provide or to comply with regulatory or legal obligations. Our default retention period, in line with regulations and statutory requirements, is currently 6 years following the cessation of a client relationship.

Personal data will be disposed of securely.

### **If you have a complaint**

If you wish to make a complaint about how your personal data is being processed by Frank Lenny Financial Limited or how your complaint has been handled, you have the right to lodge a complaint with our GDPR Owner whose contact details are provided above.

You also have the right to complain to the Office of the Data Protection Commissioner at:

Data Protection Commission  
21 Fitzwilliam Square South,  
Dublin 2.  
D02RD28  
Web: [www.dataprotection.ie](http://www.dataprotection.ie)  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)



### Privacy policy statement changes

Frank Lenny Financial Limited 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.

### Date.

This privacy notice is valid from the **1<sup>st</sup> of December 2024** until further notice.