Privacy Notice

Who we are

Howard Financial Services Limited is a financial services brokerage, t/a IWantAMortgage.ie, providing advices, services and a range of products in the areas of mortgages, financial planning, life assurance, pensions, investments, savings, and mortgage protection. The firm is owned and managed by Francis Howard, who is a Qualified Financial Adviser (QFA, RPA, SIA). The business is located at 2 Mountain Common, Ardfield, Co. Cork. www.iwantamortgage.ie; Ph: 086 865 2592; Email (mortgages): francis@iwantamortgage.ie; Email (life, pensions and protection): francis.howard@askacorn.ie

Howard Financial Services Limited operates under a sole agency agreement with Acorn Brokerage Limited, trading as Ask Acorn, for insurance distribution activities. This means that for life, pensions and protection products, we offer products from Acorn Brokerage Limited only. For mortgages, we provide advice on a fair analysis of the market basis. See our Terms of Business for further detail on this distinction.

Privacy Notice

Howard Financial Services Limited 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, on the telephone and on our website.

Our principal business is to provide financial needs advice and arrange transactions on behalf of clients in relation to life, pensions, investments, savings, mortgage protection, and mortgages.

In order to provide you with relevant information, respond to your enquiries and requests for products and/or services we sometimes request that you provide us with information about yourself. This Privacy Notice will inform you of the information we gather and how it is used.

We collect and process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR) and will also endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. We will only collect the personal information needed to perform our duties. We collect and process the following personal data: Personal details — name, address (and proof of address), other contact details (e.g. email and telephone details), gender, marital status, family details, date and place of birth, employer, job title, details of financial products including life policies, pensions, mortgages, savings, investments and, where relevant, household insurance. Details of income and expenditure, assets and liabilities, insurance claims, and mortgage arrears. Identification details — identification numbers issued by government bodies or agencies, utility bills, driver's licence or passport details. PPS numbers where required for application processing.

We may contact you where legitimate interest has been identified or if you have consented to receive marketing of our products and services.

Howard Financial Services Limited maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both those methods of data collection and use. Howard Financial Services Limited complies with the EU General Data Protection Regulation (GDPR) for the collection, use, and retention of all personal data.

You may visit our website without identifying yourself or revealing any personal information. Howard Financial Services Limited collects domain information from your visit to customise and improve your experience on our website. This 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.

For the purposes of the GDPR the data controller is:

- Howard Financial Services Limited
- Contact details: francis@iwantamortgage.ie (mortgages) or francis.howard@askacorn.ie (life, pensions and protection), Tel: 086 865 2592

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.

Use of the information we gather / Purpose why we are processing your information

Generally, we may collect your data for one or more of the following reasons:

To respond to your request(s) for advice or products or queries in relation to same.

Reviewing your financial, insurance or mortgage position or products as is prudent or required.

To recommend products that protect your lifestyle, e.g. protecting your family (including mortgage) in the event of death.

Planning your financial future, e.g. retirement funding, savings and investment options.

Assessing affordability and eligibility for mortgage products, including running your case against current lending criteria.

Preparing and submitting mortgage applications to lenders on your behalf, including generating supporting documentation packages.

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 requested, though this may limit our ability to provide certain services. You will always be able to access parts of our website, although you may not be able to access certain services without providing information.

Data retention

Data will not be held for longer than is necessary. General client details will be held while you are a client.

[VERIFY — see also the draft GDPR/data retention policy from an earlier session] This document previously identified that exact retention periods for a CBI-regulated mortgage broker need confirmation from a compliance advisor, since CBI requirements may set or influence specific retention periods (for example, the original template stated "six years after the last product expires or is cancelled" for clients with active products — confirm whether this period is correct for Howard Financial Services and for mortgage-only business specifically, as retention rules can differ between insurance, investment, and mortgage products).

Special categories of personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial or ethnic origin — financial information is not classified as a special category of personal data) — we will obtain your explicit consent.

Sharing information with third parties

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 to clients — for example, mortgage lenders and insurance/pensions product providers to whom we submit applications on your behalf, and service providers who support our technology systems (including secure data storage and document management providers). You can view the list of product providers and lenders we hold agencies with via our Terms of Business or on request.

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.

The information we collect may be used, stored and processed in the EU or UK. We will always try to process data within the EU and UK.

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

Data Subject Rights

Howard Financial Services Limited facilitates your rights in line with our data protection policy and the subject access request procedure. This is available on request.

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, you 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 not to be subject to the legal effects of automated processing or profiling without appropriate safeguards.
- **Right to judicial review** — if Howard 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 indicated in the processing of your personal data.

Profiling and Automated Decision Making

Financial and mortgage advisers use profiling in their business. The main category relevant to our services is:

Establishing affordability and providing quotations for mortgage products.

Our Regulator, the Central Bank of Ireland, requires that we establish a customer's ability to afford the cost of a mortgage product before proceeding with a transaction. We have automated processes which assist us in calculating a customer's affordability from the information that customers provide to us in relation to their gross income, family expenses, taxation and commitments.

Additionally, we have automated processes that enable us to calculate the costs of mortgage products, including indicative borrowing capacity and lender eligibility. These calculations can vary between customers depending on matters such as age, term of a proposed product, type of product, and lender-specific lending criteria.

Data security

Howard Financial Services Limited's intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect online, including the use of encryption when collecting or transferring sensitive data.

However, you should always take into consideration that the internet is an open forum, and that data may flow across networks with little or no security measures, and therefore such information may be accessed by people other than those you intended to access it.

How to update and/or amend the personal information you have provided

You are entitled to know whether we hold information about you and, if we do (subject to certain limitations), to have access to that information and have it corrected if it is inaccurate or out of date. To exercise your Right of Access or to update your details under your Right of Rectification or Erasure, please email your request to francis@iwantamortgage.ie with proof of identity.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Howard Financial Services Limited or how your complaint has been handled, you have the right to lodge a complaint directly with the data supervisory authority and/or our data protection contact (francis@iwantamortgage.ie, Tel: 086 865 2592).

Link to the complaints section of the Data Protection Commission website: https://www.dataprotection.ie

Or email the Data Protection Commission at info@dataprotection.ie

Failure to provide further information

If we are collecting your data for the purposes of assessing or processing a mortgage application and you cannot provide this data, the consequences of this could mean the application cannot be completed or progressed.

Business relationships

Our website may contain links to other websites. Howard Financial Services Limited is not responsible for the privacy practices or the content of such websites.

Contacting us

If you have any questions or comments about our privacy notice or practices, please contact us. Howard Financial Services Limited may modify or update this privacy notice from time to time at any 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 the website constitutes your consent to the contents of this privacy notice, as it may be modified from time to time.

Email: francis@iwantamortgage.ie (mortgages) or francis.howard@askacorn.ie (life, pensions and protection)
