

# Keaney Financial Services Privacy Notice

Last updated August 2023

## 1 Introduction

Keaney Financial Services Ltd, a company registered in Ireland under company registration number 343550 (“KFS”, “we”, “our”, “us”) is committed to protecting the privacy and security of your personal data. We specialise in providing financial services to our clients and our expertise includes investments, estate planning, pension planning, income protection and life insurance advice.

This Privacy Notice provides information about how KFS collects and processes the personal data of our clients and individuals (“you”, “your”) who interact with us via our website [www.keaneyfinancial.ie](http://www.keaneyfinancial.ie) (the “Website”), purchase or use our services, and to all subsequent correspondence or communications with those people, whether by email, telephone or otherwise.

KFS is a “controller” of your personal data. This means that we are responsible for deciding the purposes and means by which we use the personal data we hold about you. “Personal data” is any information by which you or any living person can be individually identified either directly or indirectly but does not include anonymised data. There are “special categories” of more sensitive personal data which require a higher level of protection.

As a controller, we are obliged to provide this Privacy Notice to you under the General Data Protection Regulation (EU) 2016/679 (the “GDPR”). In brief this Privacy Notice explains:

- what personal data of yours we hold and why we process it;
- the legal grounds that allow us to process your personal data;
- where we obtain your personal data, who gets to see it and how long we keep it;
- your data protection rights; and
- where to address queries or complaints.

This Privacy Notice does not form part of any contract, or offer to enter into a contract, with us. It may be amended by us at any time. We reserve the right to amend this Privacy Notice at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice on the Website. We recommend that you check the Website often, referring to the date of the last modification listed at the top.

It is important that you read this Privacy Notice so that you are aware of how and why we are using your personal data. Please see Section 13 (**Your Data Protection Rights**) and Section 15 (**Contact Us and Queries**) for further information about how to contact us, your rights and how to exercise those rights.

## 2 Who does this Privacy Notice apply to

This Privacy Notice applies to you if you are a client of KFS or if you share personal data with us when you access, browse and use our Website (through various domains) and interact with us on our Website.

## 3 What personal data we collect about you

3.1 We may collect, use, store and transfer different categories of personal data about you which we have grouped together as follows:

- **Identity Data** including your first name and surname.
- **Contact Data** such as your name, title, organisation, job title, occupation, address, telephone number, email address and other personal data contained in documents and communications and otherwise received in the course of us providing our services.

- **General business interactions:** Typically we process the following kinds of personal data when we communicate with prospective, existing or former clients, business contacts and other persons.
- **Marketing Data** including your preferences in receiving marketing communications from us.
- **Financial Data** such as your tax status, tax number, bank account details, financial information, transaction information, pension information, credit history including court judgments and any other information necessary for processing and collecting payments and fraud prevention.
- **Policy Data** such as employment status and occupation, previous life insurance history, details of any previous claims.
- **Communications Data** including your interactions with us and any complaints or feedback.
- **Technical Data** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this.
- **Usage Data** including information about how you use the Website and our services.
- **Website:** We collect, use and share aggregated data such as statistical data for various purposes. Aggregated data may be derived from your personal data but is not personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate Usage Data to calculate the percentage of users accessing a specific feature of our services.

### Special categories of personal data

We may also receive and process special categories of personal data about you:

**Special categories of personal data** is personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership; genetic data; biometric data for the purpose of uniquely identifying an individual or data concerning health or sexual orientation.

We limit the collection of special categories of personal data from you. Typically, we will process Health Data where it is necessary and proportionate for the purposes of advising you on an income protection policy or life insurance contract or to comply with a legal obligation to which we are subject.

## 4 How we collect your personal data

We may receive your personal data through various means including:

- **Direct interactions**

We obtain your Identity Data, Contact Data and Communications Data when you interact with us through the Website (including when these are accessed from mobile devices and by phone) or otherwise. This includes personal data you provide when you contact us to request a quote, book a live demo, email us and when you give us feedback.

We will receive your Contact Data and Financial Data through your interactions with us including when (a) you meet with us (in person or remotely) to discuss proposed or actual services or other service-related matters; (b) we communicate by post, email, telephone, SMS, video conference or by any other means; and (c) you furnish us, or our service providers, forms, documents, contracts and other materials containing your personal data.

We collect your Marketing Data when you indicate to us your preferences for receiving marketing communications from us.

- **Automated technologies**

As you browse and interact with the Website, we collect browser data. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Policy for further details.

- **Third party sources**

We may receive personal data about you from third parties. For example, we may receive personal data about you from: (a) Technical Data from Google Analytics to better understand the use of our Website. These features use cookies and anonymous identifiers to collect information.

## 5 The legal bases we rely on to process your personal data

The GDPR permit specific legal bases to process personal data. The legal bases we may rely on to process your personal data are:

- **Consent** where you have provided freely given, specific, informed and unambiguous consent to the processing of your personal data.
- **Contractual Necessity** where processing your personal data is necessary for our performance of a contract with you or to take steps at your request to enter a contract.
- **Legal Obligation** where processing your personal data is necessary for compliance with our legal obligation.
- **Legitimate Interests** where processing your personal data is necessary for our or a third party's legitimate interests. We have a legitimate interest in carrying on, managing and administering our business. Part of our business management involves processing your personal data. However, your personal data will not be processed for our legitimate purposes if doing so would override your fundamental rights and freedoms which require protection of your personal data.

## 6 Why we process your personal data

We have set out below a description of the ways we typically process your personal data and the legal reasons we rely on to do so.

(i) Website and our services

Purpose / activity	Type of Data	Grounds for processing
To administer and protect our business, services, our Website, and property hosted on or made available through the Website including implementing and monitoring security measures and access authentication controls; troubleshooting; data and usage analysis; testing; system maintenance; user support; and to use the outcome of support services to improve and protect our services, networks and systems. To anonymise personal data for statistical purposes, and to pseudonymise passwords for security purposes.	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	Necessary for the performance of a contract with you. Necessary to comply with a legal obligation. Necessary for our legitimate interests for running our business; network and systems security; to identify and/or prevent unlawful activity or other misconduct; manage disputes and to protect our interests; collate statistical information to enhance our services and business.
To use data analytics and other technologies to monitor usage of our Website, measure the performance of the Website and to optimise them, improve our services, marketing strategy and output, user interactions, relationships and experiences. We may also process information collected when you browse and use our Website to set default options for you (such as language and country).	<ul style="list-style-type: none"> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	Necessary for our legitimate interests to obtain insights into how our services are used; improve the services; identify technical issues; fix technical issues; keep our Website updated and relevant; balance web traffic; develop and manage our business and strategies for growth and marketing.

Generally, we do not rely on consent as a legal grounds for processing personal data although we will request your consent before setting any non-essential cookies or similar technologies on your computer or other device.

(ii) Our services to you

Purpose / activity	Type of Data	Grounds for processing
To advise you on and establish your eligibility for our products and services.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> </ul>	Necessary for the performance of a contract with you. Necessary to comply with a legal obligation.
To process your application for our products and services.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Policy Data</li> </ul>	Necessary for the performance of a contract with you. Necessary to comply with a legal obligation.
To manage and administer your contracts and policies, benefits or other products and services that we provide you with.	<ul style="list-style-type: none"> <li>• Identity Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Policy Data</li> </ul>	Necessary for the performance of a contract with you. Necessary to comply with a legal obligation.

(iii) General business interactions

Purpose / activity	Type of Data	Grounds for processing
To manage our relationships including to: <ul style="list-style-type: none"> <li>(i) respond to communications;</li> <li>(ii) schedule, prepare for and attend meetings (in person and remotely);</li> <li>(iii) manage, administer and take decisions regarding the on-boarding of our clients;</li> <li>(iv) provide, manage and administer our services and our relationship with our client including accounting, auditing, operational and taking other steps linked to the performance of our business relationship;</li> <li>(v) carry out our obligations under and arising from any agreements you and any product provider;</li> <li>(vi) manage, collect and pursue monies owed to us;</li> <li>(vii) notifying changes to Privacy Notice and to administer data protection, privacy and other rights.</li> </ul>	<ul style="list-style-type: none"> <li>• Identity and Contact Data</li> <li>• Contact Data</li> <li>• Financial Data</li> </ul>	Necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract.  Necessary to comply with a legal obligation.  Necessary for our legitimate interests for responding to communications, attracting new clients and business, running our business, on-boarding our client, providing our services, providing service information and keeping records.
Conducting or exploring any re-organisation of some or all of our business and assets, merger or acquisition or other corporate deal.	<ul style="list-style-type: none"> <li>• Contact Data</li> <li>• Financial Data</li> </ul>	Necessary for our legitimate interests to run our business, expand or otherwise restructure our business and assets; make corporate decisions, negotiate and enter into corporate transactions.

Purpose / activity	Type of Data	Grounds for processing
To deal with and manage complaints, claims and legal disputes involving our client, you and/or others; to identify and/or prevent fraud or other breaches of laws; conduct or assist with internal, government, regulatory, law enforcement and other investigations, inquiries or actions; comply with our insurance policies and to exercise or defend our legal rights or to comply with court orders or orders by applicable regulators.	<ul style="list-style-type: none"> <li>• Identity and Contact Data</li> <li>• Contact Data</li> <li>• Financial Data</li> <li>• Technical Data</li> <li>• Usage Data</li> </ul>	<p>Necessary for the performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for the purposes of obtaining legal advice or for the purposes of, or in connection with, legal claims, prospective legal claims, legal proceedings or prospective legal proceedings, or is otherwise necessary for the purposes of establishing, exercising or defending legal rights.</p> <p>Necessary for our legitimate interests of managing our business including complying with our policies of insurance and complying with or cooperating with any regulatory requirement or matter.</p>

We will only use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 7 Automated processing

We sometimes use automated decision-making, such as profiling, to process your Personal Data.

- We use automated statistical analysis of the information we collect about you as part of our business:
- When you apply for a financial product we may evaluate the application using simple scoring rules to determine whether or not the product best meets your needs along with a human review of the application.
- By assessing your risk profile to decide the type of financial service suitable for you, or to decide other terms and informing our decision and offering based on that risk profile.
- Test and maintain the stability and performance of our systems.
- Carry out long-term statistical modelling, provided that such modelling does not affect any decision we make about you.

Automated analysis of your information assists us to comply with our legal obligations. It allows us to:

- Use automated processing in connection with our money laundering, fraud and terrorist financing prevention obligations to screen for suspicious transactions, or to identify applicants which may be subject to international sanctions and to monitor calls, transactions and patterns to prevent and investigate fraud.

Automated analysis of our client information enables us to manage our business for our legitimate interests. It allows us to:

- Make more informed business decisions; including improving the quality of products and services we can offer (including for the purposes of direct marketing, unless you have objected to us using your details in this way). For example, if you give us permission we may use your transaction history/account information to identify your financial habits and offers that are relevant to you based on your account transactions or behaviour.
- Test and maintain the stability and performance of our systems.
- Carry out long-term statistical modelling, provided that such modelling does not affect any decision we make about you.

## 8 Third party information

### Other individuals' personal data

- Where you provide us with personal data relating to other people, you represent and warrant that you will only do so in accordance with applicable law, including the GDPR. You will ensure that before doing so, the individuals in question are made aware of the fact that we will hold information relating to them and that we may use it for any of the purposes set out in this Privacy Notice and where necessary you will obtain their consent to our use of their information. You will provide anyone that you provide us with personal data about with a copy of this Privacy Notice. We may notify those individuals that you have provided their details to us.

### Information collected through third-party links and content

- This Website may include links to other websites and other content from third party businesses and can offer direct interaction with external websites, networks or platforms that are outside our control. These third-party businesses may use cookies, web beacons or other similar technology to collect information about you. We do not have access to or control over these third parties or the cookies, web beacons or other technology that these third parties may use. We are not responsible for the security, privacy of the information collected by these third parties or the privacy practices of these third parties or the content on any third-party website. You are encouraged to review the privacy policies of the different websites you visit.

## 9 Disclosure of your personal data

We reserve the right to disclose your personal data to third parties:

- if we are under any legal or regulatory duty to do so; and
- to protect our rights or the safety of us, our personnel, users or others.

We may disclose your personal data for the purposes listed in Section 6 of this Privacy Notice (**Why We Process Your Personal Data**) to the categories of recipients described in this Section 9 (**Disclosure of Your Personal Data**).

We require these parties to keep your personal data confidential and secure and to protect it in accordance with the law. They are only permitted to process your personal data for the lawful purpose for which it has been shared and in accordance with our instructions.

We reserve the right to disclose your personal data to third parties:

- Our affiliates: Companies within our group of companies who assist us in providing our services
- Service providers. We use third party service providers to hold and use personal data on our behalf in order to provide us with a service.
- Our advisors. We may also disclose personal data to our professional advisors and experts in order to obtain their assistance in carrying out our services and our activities. We require these parties to keep your personal data confidential and secure and to protect it in accordance with the law. They are only permitted to process your personal data for the lawful purpose for which it has been shared and where a service provider uses your personal data as our processor, only in accordance with our instructions.
- Public and Government Authorities. Entities that regulate or have jurisdiction over us. We will disclose personal data in order to comply with any legal obligation, if we are ordered to do so by a court of competent jurisdiction, law enforcement, regulatory or administrative authorities. We may also do so where we consider it necessary in order to enforce our legal notices and agreements we may have with you, and/or to protect the rights, property and/or safety of our personnel, agents and others.
- Corporate Activity. If we acquire other business, dispose of all or part of our business or merge with any other party, it may be necessary for us to disclose your personal data to other parties and their professional and other advisors in the course of any relevant transaction.

## 10 Transfers of your personal data

In connection with our business and for administrative, management and legal purposes, we may transfer your personal data to jurisdictions outside of the European Economic Area. Where we need to transfer your personal data, we shall ensure that the transfer is lawful and that there are appropriate security arrangements in place.

## 11 Security of your personal data

KFS is committed to maintaining the security of your personal data it processes. We maintain appropriate physical, procedural, organisational and technical security measures intended to prevent loss, misuse, unauthorised access, disclosure, or modification of your personal data under our control. We also limit access to your personal data within our organisation and to third parties that need access to your information in providing services to us. They will only process your personal data on our instructions and are required to protect personal data. If you have reason to believe that your personal data is no longer secure, please notify us immediately using the contact information supplied in Section 15 (contact us and Queries ).

Please be aware that when you transmit information to us or to our service providers over the internet or another telecommunications network this can never be guaranteed to be 100% secure. For any payments which we take from you or pay online we will use a recognised third party online secure payment system, and we are not responsible for the security of this system. You should contact these third parties for information about the security of these internet, telecommunications systems or payment systems if you need further information.

We cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data but we take reasonable steps to prevent this from happening. We have put in place measures to protect the security of your personal data and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 12 Retention of your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, tax or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 13 Your data protection rights

You have various rights under the GDPR, subject to certain exemptions, in connection with our processing of your personal data, including those set out in the table below.

Right	Explanation
Access and Information	You are entitled to receive, on request and free of charge, a copy of all your personal data that we hold together with other information about the processing of that personal data. There are some limitations to this right. For example, if the personal data also relates to another person and we do not have that person's consent, or if the personal data is subject to legal privilege. Where there is data that we cannot disclose, we will explain this to you.
Rectification of your personal data	You may request to have inaccurate or incomplete information corrected and updated by us.
Erasure of your personal data	This right enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing. However, where we hold and process your personal data in order to comply with legal obligations, such as compliance with tax, or for the establishment exercise or defence of legal claims, your right to ask us to delete or remove your personal data is limited.

Right	Explanation
Object to processing	You may object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) in order to justify the basis for our processing your personal data and there is something about your particular situation which makes you wish to object to processing on this ground.
Request restriction of processing of your personal data	This right enables you to ask us to suspend the processing of your personal data (e.g. if you want us to establish its accuracy or the reason for processing it).
Data Portability	Where we process your personal data by automated means (i.e. not on paper) and this processing is based on your consent or required for the performance of a contract between us, you are entitled, where technically feasible to request that we transmit your personal data in this format to another controller.
Not be subject to solely automated decision.	You have the right to be informed if your personal data will be subject to automated decision making, including profiling, where that decision impacts on your legal rights. Profiling is an automated form of processing of personal data often used to analyse or predict personal aspects about an individual person.
Withdraw consent	Where you have provided your consent to the collection and processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the information provided below. Once we have received your notification that you have withdrawn your consent, we will no longer process your personal data for the purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
The right to complain to a Supervisory Authority	You have the right to make a complaint in respect of our compliance with GDPR with our principal supervisory authority, the <a href="#">Data Protection Commission</a> or with another supervisory authority in the European Union.

## 14 Updating your personal data

You are responsible for notifying us of any changes to your personal data that you provide to us.

## 15 Contact us and queries

If you have any questions or wish to exercise any of your data protection rights, you should raise these with our data protection team by emailing [compliance@kfs.ie](mailto:compliance@kfs.ie). You may also raise complaints with the [Data Protection Commission](#) or another supervisory authority.

## 16 Changes to this privacy notice

We will change this Privacy Notice from time to time and any changes will be contained in a revised Privacy Notice posted on the Website. This version of the Privacy Notice was last updated in September 2023.

### Directors:

Terence J. Keaney ACII  
Z. Erdis ACII

### Registered Office:

30 Lower Leeson Street  
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### Registered in Ireland:

No. 343550