ALLIED FINANCIAL PRIVACY NOTICE / STATEMENT

Introduction

1.1 Allied Financial is committed to safeguarding the privacy of our clients, prospective clients, and website users.

1.2 This Privacy Notice applies where we are acting as a data controller with respect to your personal data, meaning we determine the purposes and means of processing your personal data.

1.3 This document explains how we collect, use, process, and disclose personal data and outlines your rights under the General Data Protection Regulation (GDPR).

For the purposes of the GDPR the data controller is:

- Mark Winters & Henry Bourke
- Call: 096 60044
- Email: info@alliedfinancial.ie
- When we refer to 'we' it is Allied Financial

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 We Are

2.1 Mark Winters & Henry Bourke trading as Allied Financial is regulated by the Central Bank of Ireland (Central Bank ref no; C6834) as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations 2018; as an Investment Intermediary authorised under the Investment Intermediaries Act, 1995. C.

2.2 Allied Financial is a member of Brokers Ireland. At Allied Financial our principal business is to provide bespoke advice and arrange transactions on behalf of clients in relation to Life Cover, Serious Illness, Pensions & Retirement Planning, and Investments & Savings. A full list of insurers, product producers and lending agencies with which we deal is available on request.

How We Use Your Personal Data

3.1 In this section we outline:
(a) **The categories of personal data we process;**
(b) **How we collect that data;**
(c) **The purposes for which we process it.**
(d) **The legal bases for processing; and**
(e) **The parties with whom we may share it.**

What Personal Data We Collect

4.1 We may collect and process personal data including your name, address, email address, telephone number, date of birth, marital status, and family details.

4.2 We may collect identification information such as PPS numbers, passport details or other government-issued identification where required for legal and regulatory purposes.

4.3 We may collect financial information including income, assets, liabilities, financial objectives, and existing financial arrangements.

4.4 We may collect employment information including occupation, salary, and employment status.

4.5 Where required for insurance related services, we may process special categories of personal data, including health information. This processing will only take place where it is necessary for the provision of such services and will be carried out with your explicit consent and in accordance with applicable data protection laws.

4.6 We may also collect data relating to your use of our website, including IP address, browser type, and usage patterns.

How We Collect Your Data

5.1 We collect personal data from you directly when you:
(a) request advice or services;
(b) complete forms or fact-finds;
(c) communicate with us by phone, email or in meetings;
(d) submit enquiries via our website.

5.2 We may also receive personal data from third parties, such as product providers, referral partners or potentially your employer, where you have authorised this.

5.3 If you provide us with personal data relating to another individual (such as a spouse or dependent), you confirm that you have obtained their consent to share this information with us and for it to be processed in accordance with this Privacy Notice

Purpose and Legal Basis for Processing

6.1 We process your personal data for the purposes of providing financial advice, arranging financial products, administering policies, and communicating with you.

6.2 The legal bases for processing your personal data include:
(a) performance of a contract;
(b) compliance with legal obligations;
(c) legitimate interests in operating and improving our business;
(d) consent, where required (including for sensitive data).

6.3 Where processing is based on consent, you may withdraw that consent at any time.

Sharing Your Personal Data

7.1 We may share your personal data with third parties where necessary to provide our services or comply with legal obligations.

This includes sharing with product providers such as Zurich Life, Royal London, Aviva, New Ireland, Hive insurance, ITC, and Irish Life.

We may also share data with mortgage lenders such as Bank of Ireland, Haven, PTSB, NUA, Spry Finance and brokers Ireland.

We may also share data with intermediaries and professional firms including BCP, Conexium, Greenman investments and Cantor Fitzgerald Ireland where required.

7.2 We use third-party service providers to support our operations, including Information Software Solutions and Microsoft. This includes Microsoft 365 and Microsoft Outlook for email communications. Please note that while we take appropriate security measures, the transmission of information via email or the internet is not completely secure and is done at your own risk.

We may also use Microsoft Copilot and other artificial intelligence tools to assist with internal administrative and support functions. These tools are used solely to improve efficiency and are not used for automated decision-making that affects clients. We do not input sensitive personal data into these tools unless appropriate safeguards are in place.

7.3 Meetings may be recorded with your knowledge and consent on Microsoft Teams for the purposes of accurately capturing the discussions and decisions made during these meetings. Additionally, we use an artificial intelligence tool to transcribe and create minutes of these meetings. The legal basis for this processing is consent.

7.4 We may disclose your personal data to regulatory authorities where required, including the Central Bank of Ireland, the Revenue Commissioners, and the Data Protection Commission.

7.5 All third parties are required to process your data securely and only for the intended purposes.

Social Media

8.1 We use social media platforms including Instagram and Facebook to communicate with clients and promote our services.

8.2 Where you interact with us on these platforms, for example by sending messages, commenting on posts, or engaging with our content, we may collect and process personal data such as your name, username, and the content of your interaction.

8.3 Any personal data collected via social media will be used solely for the purpose of responding to your enquiry, engaging with you, or improving our services.

8.4 Please note that these platforms operate independently of Allied Financial and have their own privacy policies governing how your data is processed. We encourage you to review the privacy policies of Instagram and Facebook.

8.5 We do not request or encourage the sharing of sensitive personal or financial information via social media channels.

Transfers Outside the EEA

9.1 In certain circumstances, your personal data may be transferred to, stored in, or accessed from countries outside the European Economic Area (EEA), including where we use third-party service providers such as Microsoft.

9.2 Where such transfers occur, we will ensure that appropriate safeguards are in place to protect your personal data in accordance with applicable data protection laws. These safeguards may include:
(a) reliance on adequacy decisions issued by the European Commission;
(b) the use of Standard Contractual Clauses (SCCs) approved by the European Commission; or
(c) other legally recognised transfer mechanisms.

9.3 We take all reasonable steps to ensure that your personal data is treated securely and in accordance with this Privacy Notice, regardless of where it is processed.

Data Retention

10.1 We will retain your personal data only for as long as necessary for the purposes for which it was collected, including for the provision of our services and to comply with legal, regulatory, and reporting requirements.

10.2 In general, we retain client data for a period of up to six years after the end of our relationship with you, in line with regulatory requirements and industry best practice.

10.3 In certain circumstances, we may retain your personal data for longer periods were required to comply with legal obligations, resolve disputes, enforce our agreements, or protect our legitimate interests.

10.4 Personal data will be securely stored and, when no longer required, will be disposed of in a secure manner.

Your Rights

11.1 In this Section 11, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

You have the following rights under data protection law:
(a) the right to access your personal data;
(b) the right to correct inaccurate data;
(c) the right to erasure;
(d) the right to restrict processing;
(e) the right to object to processing;
(f) the right to data portability;
(g) the right to withdraw consent;
(h) the right to lodge a complaint.

11.2 You have the right to confirmation as to whether we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply you a copy of your personal data.

11.3 You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

11.4 In circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes, and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise, or defence of legal claims.

11.5 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise, or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

11.6 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise, or defence of legal claims.

11.7 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

11.8 To the extent that the legal basis for our processing of your personal data is:

(A) Consent; or

(B) That the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your

personal data from us in a structured, commonly used and machine readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

11.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

11.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal. Our Details

Profiling and Automated Decision Making

12.1 We may use limited automated tools to assist in providing indicative quotations and financial comparisons. These include quotation calculators provided by Zurich Life via our website, and comparison tools provided by Brokers Ireland. These tools use basic information provided by you to generate indicative quotes or compare products across providers.

12.2 These tools are used to support our advisory process only and do not replace professional advice. All recommendations are reviewed and provided by a qualified advisor.

12.3 You have the right to request human intervention and to challenge any outcome generated by automated tools.

Failure to Provide Data

13.1 If you do not provide the personal data required, we may be unable to provide our services, process transactions, or fulfil our contractual and regulatory obligations.

13.2 In the case of execution-only services, where no advice is provided, we still require certain information to process transactions and comply with legal and regulatory requirements, including anti-money laundering obligations. Failure to provide accurate and complete information may result in delays, errors in processing, or the inability to complete a transaction.

Website Usage and Cookies

14.1 Our website uses cookies and similar technologies to enhance your browsing experience and to analyse how our website is used.

14.2 Cookies are small text files stored on your device that help us improve functionality, performance, and user experience.

14.3 We use both essential cookies (required for the operation of the website) and non-essential cookies (such as analytics), which will only be used with your consent.

14.4 You can manage your cookie preferences through your browser settings or via our website cookie banner.

14.5 For more detailed information on the cookies we use and how to manage them, please refer to our Cookie Policy available on our website.

Updates to This Privacy Notice

15.1 We may update this Privacy Notice from time to time. Updated versions will be published on our website.

15.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

Complaints

You have the right to make a complaint about how your personal data is processed by Allied Financial.

If you wish to raise a concern, you can contact us directly using the contact details provided in this Privacy Notice. We will handle your complaint in accordance with our internal complaint's procedure, which is available on request.

If you are not satisfied with our response, you have the right to lodge a complaint with the Data Protection Commission, whose contact details are available on their website.

Contact Us

16.1 If you have any questions about this Privacy Notice, please contact Allied Financial at 096 60044 or info@alliedfinancial.ie.

This privacy policy was last reviewed in March 2021
But was updated by Allied Financial in April 2026.

Allied Financial
IT'S MY MONEY