

Privacy Policy

Financial Innovations Ltd t/a Financial Innovations is committed to protecting and respecting your privacy. This Privacy Policy (the "Policy") together with any disclaimers sets out the basis on which any personal data we collect from you or that you provide to us, or that is provided to us relating to you ("Data") by any means will be processed. Please read the following carefully to understand our use of personal data. Please note that the Policy relates only to living individuals in relation to personal data relating directly to themselves, and not to persons in any other capacity.

Information we may collect from you

We collect Data from you which you volunteer when you provide such Data to us, or via our services with which you interact. We may also be given other Data relating to you by other persons, or we may obtain such other Data about you as may be provided to us in the course of our legitimate business activities.

We may collect and process Data, including the following in the course of providing services to you, which could contain your personal data:

Your full name; your address; your various email addresses; your various phone numbers including mobile phone number; financial information about you, including your bank account details, credit card details, debit card details or other payment details, details of contracts you have entered with third parties for us to provide services to you, details of your driving licence, details of your passport and all other Data which you ask us to process on your behalf, or which is necessary for us to process in order for us to fulfil our role as providing a service to you.

We may also process other data, which is not personal data.

When you access our website your device's browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data. This information may be used to help us to improve our website and the services we offer, and to offer services to you.

Security and where we store your Data

We are committed to protecting the security of your Data. We use a variety of security technologies and procedures to help protect your Data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We will continue to revise policies and implement additional security features as new technologies become available.

The transmission of information via the internet is not completely secure and may involve the transfer of data to countries outside of the European Economic Area (EEA). This occurs typically through use of

cloud solutions for web hosting, email hosting or proprietary software solutions delivered to us through the Cloud. We do not however authorise any third party to use your Data for their own purposes. Non-EEA countries may not provide an adequate level of protection in relation to processing your personal data. By submitting your data, you agree to this transfer, storing and processing.

Although we will do our best to protect your Data, we cannot guarantee the security of your Data transmitted to us. Any transmission of data is at your own risk. Once we receive your Data, we use appropriate security measures to seek to prevent unauthorised access.

Uses made of your Data

We use your Data that we hold to:

- In our legitimate interest of advertising our services, provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes (our list of services below);
- carry out our obligations arising from any contracts entered into between you and us;
- comply with legislation; and/or
- notify you about changes to our services.

List of services

We provide web design and digital marketing services.

We may use your data to send you information relating to our services, events and products which may be of interest to you. If you do not want us to use your Data in this way, please notify us to that effect. You can contact us as set out at the end of this Policy.

We keep your Data for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your Data to provide this service to you, you can request that we erase your Data and close your account with us. Please note that if you request the erasure of your Data:

- We may retain some of your Data as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety
- We may retain and use your Data to the extent necessary to comply with our legal obligation. For example, we may keep some of your information for legal reporting purposes and audit purposes.
- Because we maintain our records to protect from accidental or malicious loss and destruction, residual copies of your Data may not be removed from our backup systems for a limited period of time.

Disclosure of your information

We may disclose your Data to third parties who provide a service to us or in the event that we sell or buy any business or assets, in which case we may disclose your Data to the prospective seller or buyer of such business or assets or if we are under a duty to disclose or share your Data in order to comply with any legal obligation, or to protect our rights, property, or safety of staff or customers. Currently we disclose your Data to the following providers.

Provider/Recipient	State “EU” or alternatively state jurisdiction to which the Data is transferred
Regulators, in order to comply with any applicable law and court orders.	EU
Your authorised representatives	EU and Non EU
Third parties with whom: (i) we need to share your information to facilitate transactions you have requested, and (ii) you ask us to share your information	EU and Non EU
Service providers who provide us with support services	EU and Non EU
Statutory and regulatory bodies (including central and local government) and law enforcement authorities;	EU
Credit reference/rating agencies	EU and Non EU
Third parties in connection with a sale or purchase of assets by us:	EU and Non EU
Persons making an enquiry or complaint; debt collection agencies, budgeting and advice agencies, tracing agencies, receivers, liquidators, examiners, Official Assignee for Bankruptcy and equivalent in other jurisdictions;	EU and Non EU
Trade associations and professional bodies, non-statutory bodies and members of trade associations;	EU and Non EU

Pension fund administrators, trustees of collective investment undertakings and pensions trustees insurers/re-insurers, insurance bureaux healthcare professionals and medical consultants;	EU and Non EU
Business or joint venture partners	EU and Non -EU

Some jurisdictions may not have adequate safeguards for the protection of personal data, and where this is the case we comply with Chapter 5 of the General Data Protection Regulation (“GDPR”) to provide an alternative method of safeguarding your personal data.

Miscellaneous

We do not conduct profiling.

Where we process your Data based only on your consent, you may withdraw your consent.

You have the right to bring a complaint to a supervisory authority if you have any complaints about the processing of your Data. In Ireland the Data Protection Commission is the supervisory authority.

In circumstances where the provision of your Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, we will advise you at the point of collecting your Data whether the Data is a required field, and the consequences of not providing the Data.

Links to other sites

Our website may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that those websites have their own privacy policies and that we do not accept any responsibility or liability for those policies. Please check those policies before you submit any data to those websites.

Your rights

As an individual, under EU law you have certain rights to apply to us to provide information or make amendments to how we process your Data. These rights apply in certain circumstances and are set out below: -

1. The right to access data relating to you (‘access right’). Please see Form 1a [here](#) ;
2. The right to rectify/correct data relating to you (‘right to rectification’). Please see Form 2a [here](#);
3. The right to object to processing of data relating to you (‘right to object’). Please see Form 3a [here](#).

4. The right to restrict the processing of data relating to you ('right to restriction'). Please see Form 4a [here](#);
5. The right to erase/delete data relating to you (i.e. the "right to erasure"). Please see Form 5a [here](#); and
6. The right to 'port' certain data relating to you from one organisation to another ('right to data portability'). Please see Form 6a [here](#) ;

If you are receiving marketing from us, you may opt out. If you no longer wish to be contacted for marketing purposes, please contact us as set out at the end of this Policy to request to "opt out" of marketing

Payments

We may need to collect the following information, as it is necessary for the adequate performance of the contract with you and to comply with applicable law (such as anti-money laundering regulations). Without it, you will not be able to use payment services:

- **Payment Information.** When you use our payment services, we require certain financial information (like your bank account or credit card information) in order to process payments and comply with applicable law.
- **Identity Verification and Other Information.** We may require identity verification information (such as images of your government issued ID, passport, national ID card, or driving license) or other authentication information, your date of birth, your address, email address, phone number and other information in order to verify your identity, provide the payment services to you, and to comply with applicable law.

We use the payment data collected to:

- Enable you to access and use the payment services.
- Detect and prevent fraud, abuse, security incidents, and other harmful activity.
- Conduct security investigations and risk assessments.
- Conduct checks against databases and other information sources.
- Comply with legal obligations (such as anti-money laundering regulations).
- Enforce the payment Terms and other payment policies.
- With your consent, send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences.

Our payments section processes this information given our legitimate interest in improving the payment services and its users' experience with it, and where it is necessary for the adequate performance of the contract with you and to comply with applicable laws.

Changes to this policy

We reserve the right to change this Policy from time to time in our sole discretion. If we make any changes, we will post those changes here so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our site or our services or otherwise provide data after we post any such changes, you accept and agree to this Policy as modified.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Contact Us

Questions, comments, requests and complaints regarding this Policy and your Data we hold are welcome and should be addressed to us at **Privacy Compliance Co-Ordinator** at john@fini.ie

All requests will be dealt with promptly and efficiently.

This Policy is effective from 25th May 2018.

FORM NO. 1a

ACCESS REQUEST FORM

You have the right to access and receive a copy of personal data relating to you ("Data"). We ask that you complete this form, so we can determine the details of your request, and respond to and implement your request as quickly as possible.

This process will provide you with Data in manual or electronic form. Information relating to third parties or other information exempt under applicable law(s) will not be provided.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to: **Data Privacy Co Ordinator at insert e mail address**

Agent of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject's behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone No	
e-mail	
Mobile	
If applicable; Current/last post held in Group	
Department	
Office location	
Your employee no. (if any)	
Any other relevant Information:	

Details of the Agent or Requestor (if any)	
Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Details regarding what information you are looking for. The more details you can give to us the better we will be able to respond to you!	
Hard copy files (please specify department & location, if known)	
Search criteria (<i>i.e.</i> name, key word, date),	
Connection to file (<i>i.e.</i> employee/partner/staff/client/supplier)	
Electronic data (please specify system, if known)	
Search Criteria (please specify the search criteria, <i>e.g.</i> system name, identifier no., if known)	
Connection to file (<i>i.e.</i> employee/partner/staff/client/customer/supplier)	
Any other filing system	
Search criteria	
Any other information you feel might assist us in responding to your request	

We promise to make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____

FORM NO. 2a

DATA CORRECTION/UPDATE REQUEST FORM

correct and update personal data relating to you ("Data") that is inaccurate. We ask that you complete this form, so we can determine the details of your request and, where applicable, implement your request.

If your request is valid, we will correct and update the information requested.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to **Privacy Compliance Co-Ordinator at email address**

Please also provide any documentation you have to prove that the information you wish to update needs to be updated or corrected.

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the requestor's behalf.

Please complete as much of the following information as you can:			
Full name of data subject	(Title)	(First name)	(Surname)
Present Address			
Street			
Town			
County			
Postcode			
Other contact details			
Telephone			
Email			
Mobile			

Details of the Agent or Requestor (if any)	
Name	
Address	

Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Category of personal information	Personal Information Currently on File	Corrected Personal Information
<i>e.g. name, address.</i>		

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____

FORM NO. 3a

OBJECTION TO PROCESSING FORM

object to our processing of personal data relating to you ("Data") in certain circumstances. We ask that you complete this form, so we can determine the details of your request and, where applicable, implement your request.

If your request is valid, we will cease processing this Data for the purposes to which you object.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to the **Privacy Compliance Co-Ordinator at email address**

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject's behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone	
Email	
Mobile	

Details of the Agent or Requestor (if any)	
Name	
Address	

Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Uses of personal information that you object to	Reason for objecting to these uses of your personal information
<i>Please make reference to the uses of personal information set out in our privacy notice</i>	<i>e.g. our uses of the personal information are unlawful, specifying precisely why; you no longer want to receive direct marketing messages from us</i>

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____

FORM NO. 4a

RESTRICTION REQUEST FORM

You have the right to restrict our processing of personal data relating to you ("Data") in certain circumstances. We ask that you complete this form, so we can establish the details of your request and, where possible, implement your request.

If your request is valid, we will restrict our processing of this Data unless you give your consent to us using it in the future, or we need to use it for other legal reasons.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to Privacy Compliance Co-Ordinator **at email address**

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject's behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone	
Email	
Mobile	

Details of the Agent or Requestor (if any)	
Name	
Address	

Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Uses of personal information to be restricted	Reason for restricting these uses of your personal information
<i>Please refer to the uses of personal information set out in our privacy notice</i>	<i>e.g. the personal information is inaccurate, our uses of it are unlawful, etc.</i>
Uses of personal information to be restricted	Reason for restricting these uses of your personal information

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, considering the complexity and number of requests.

Signature _____

Date _____

FORM NO. 5a

ERASURE REQUEST FORM

You have the right to have personal data relating to you ("Data") deleted in certain circumstances. We ask that you complete this form, so we can determine the details of your request and, where applicable, implement your request.

If your request is valid, we will delete the information requested, unless we are required by law to keep it - in this case we will advise you of what we are keeping, and the reasons why.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and address) to **Privacy Compliance Co-Ordinator at insert email address**

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject's behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (First name) (Surname)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	

Telephone	
Email	
Mobile	

Details of the Agent or Requestor (if any)	
Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

Personal Information Currently on File to be deleted	Reason why that personal information should be deleted
<i>e.g. name, mobile number, email address</i>	<i>e.g. is the information inaccurate or out of date?</i>

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____

PORTABILITY REQUEST FORM

Where we use your personal information to fulfill our contractual obligations to you, or where you have consented to our use of personal data relating to you ("Data"), and where this Data is processed by us automatically, you have the right to 'port' any such Data you provide to us subject to certain requirements.

This means you have the right to receive a copy of it in a machine-readable format and to have it transmitted to another company. We ask that you complete this form, so we can determine the details of your request and implement your request.

This process will provide you with certain personal information that you have provided to us, in a format that can be read electronically and, if you wish this, can be sent to another data controller.

Please complete your details below and sign where indicated. Send the completed form and proof of identity (by way of proof of your name and your address) to Privacy Compliance Co-Ordinator **at email address**

Agents of the requestor: Please note that you must provide your own contact details and you must provide proof of your entitlement to act on the data subject's behalf.

Please complete as much of the following information as you can:	
Full name of data subject	(Title) (Surname) (First name)
Present Address	
Street	
Town	
County	
Postcode	
Other contact details	
Telephone	
Email	
Mobile	

Details of the Agent or Requestor (if any)	
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Name	
Address	
Phone Number	
Email address	
Proof of entitlement to act (enclose authorisation)	

To help us to respond to your request as quickly as possible, please provide as much detail as possible regarding the personal information you seek. If you wish to 'port' all applicable personal information, please write 'all' below	Names and contact details of companies to which that data should be transmitted
<i>e.g. all information I have uploaded to the website; payment details; or billing and delivery addresses.</i>	

We will make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification documentation, but please note that this time may be extended to 3 months, when necessary, taking into account the complexity and number of requests.

Signature _____

Date _____