Lifestyle Financial Planning

Privacy Statement

Introduction

ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning 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 GDPR in relation to not only processing your data but ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- ES Lifestyle Financial Planning, 1 Tintern, Saltmills, New Ross, Co. Wexford, Y34 H364. Contact: Elio Lodola, 086 811 4566, elio@eslifestylefinancialplanning.ie
- When we refer to 'we' it is ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning

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 are we

ES Lifestyle Financial Planning is regulated by the Central Bank of Ireland. We offer advice on pensions, investments, life cover and income protection.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Name: Elio Lodola
- Email address: elio@eslifestylefinancialplanning.ie
- Phone number: 086 811 4566

How do we collect your information and what information do we collect?

The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data.

Purpose for processing your data

We only collect the personal data we need to provide our services to you. Below we explain what information we collect, how we use it and the legal basis for doing so.

Our organisation collects personal data in the following ways, if you:

- **request a service from us*;* eg Investment, pension, protection advice**
- **register with or use any of our websites or online applications*;* eg a request to contact you via our website.**
- **contact us with a complaint or query.**

What information do we collect?

The information we collect about you includes the following:

1.	**Contact and Identifying information, e.g., name, address, contact details; email, mobile, landline**
2.	**Unique identifiers, e.g.:** • **PPS number – the reason why we collect your PPS number is if the company we are placing new business with will require this information.** • **pension scheme reference number- the reason why we collect this is if we need to gather information on your behalf.**
3.	**Demographic details, age, gender, marital status, lifestyle, and insurance requirements; date of birth, dependents, photo ID, as well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. E.g., your children/spouse**
4.	**Family and Beneficiary Data, e.g., dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant.**
5.	**Employment information e.g., role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history;** **This information is necessary for our Fact Find with our clients.**
6.	**Publicly available sources: e.g., Information about you in the public domain such as Director information from the Companies Registration Office.**
7.	**Health information such as information about your health status, medical records and medical assessment outcomes; We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol), medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information. *We may require this data for e.g., life cover, health insurance income protection***

8.	**Pensions and Insurance Benefits information such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, PAO.**
9.	**Financial details, e.g., bank account details.**
10.	**Searches that we undertake in relation to sanctions, money laundering and credit checks. For PEP/AML/Sanctions search providers we use Broker Information Services.**

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

How do we use your personal data?

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for insurance, investment, protection, pension products, financial advice, quotes.

1.	**Performing services for our clients and prospective clients – when you require insurance/investment products, we use your data to enable us to provide the required product**
2.	**Statutory and other regulatory requirements – we are required to carry out various obligations which include:** • **AML/Sanction checking** • **Knowing your customer "Fact Find"** • **Adherence to the Consumer Protection Code**
3.	**Communicate and marketing to you – by way of letters or email or phone call**
4.	**To contact you if required or to respond to any communications that you might send to us.**
5.	**Carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.**
6.	**Handling complaints**
7.	**To notify you about changes to our service**

Why we are processing your data? Our legal basis.

In order to provide you with our pension, investment and assurance services, ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning needs to collect and process your personal data. We are required, therefore, to inform you of the legal bases for processing your personal data. One such legal basis is that the processing is necessary for the performance of the advisory services contract (and any other contract) that we commit to delivering to you from time to time. Another legal basis is that some processing is necessary for the purposes of the legitimate interest that we have, as a firm that is authorised and regulated by the Central Bank of Ireland, in the proper administration and correct operation of our firm. There may also be circumstances where the legal basis for processing your personal data is consent (where we have sought it and it has been provided to us), in which case that consent may be withdrawn at any time.

In any event, ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

How will ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning **use the personal data it collects about me?**

ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

Special Categories of personal data

If we collect any special categories of personal data (e.g. health information, religious beliefs, racial or ethnic origin), we will ensure the following. Please note that financial information is not classified as a special category of personal data.

- we will obtain your explicit consent

How we share your data

When required, 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. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements.

Who are we sharing your data with?

Aviva Life and Pensions Limited
Irish Life
Royal London
New Ireland Assurance
Standard Life Assurance
Cantor Fitzgerald
Blackbee Investments Ltd
Zurich Life Assurance plc
Wealth Options Limited
BCP Asset Management DAC
Independent Trustee Company Limited
MMPI trading as Broker Solutions

Security

The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

Personal data will be disposed of securely.

We may pass your personal data on to third-party service providers contracted to ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning 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 your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning procedures

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.
The third parties that we pass your personal data to are:

- Broker Information Services, who administer our customer relationship management system.

We have issued all our third party processors with a Data Processor checklist asking them GDPR specific questions

If we transfer personal data to a third party or outside the EU 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.

Data Subjects Rights:

ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

Your rights as a data subject

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 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 have the right not to be subject to a decision based solely on automated processing, including profiling.

- **Right to judicial review: in the event that ES Lifestyle Financial Planning 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 we have indicated in the processing of your personal data.

Additional information we are providing you with to ensure we are transparent and fair with our processing

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which it was obtained. ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning will process personal data in accordance with our retention schedule, which follows the requirements of the Central Bank of Ireland and our internal governance. In general, we keep records relating to our clients for six years after our relationship with you ends, as required by the Consumer Protection Code. Where you ask us for a quote or a service that does not go ahead, we keep the related records for 12 months. Some records may be kept for longer where the law requires it.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning, or how your complaint has been handled, you have the right to lodge a complaint with our Data Protection Officer / GDPR Owner, Elio Lodola.

You may also lodge a complaint with the Data Protection Commission in Ireland, whose details are: Data Protection Commission

6 Pembroke Row,
Dublin 2,
D02 X963
Phone: (01) 765 0100 / 1800 437 737
Web: www.dataprotection.ie Email: info@dataprotection.ie

Failure to provide further information

If we are collecting your data for a contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

Profiling – automated decision making

Financial advisors use profiling in their business. The main categories are:

a) Risk profiling.
b) Profiling for marketing purposes.
c) Establishing affordability and providing quotations for financial services products.

a) Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) advisors have automated calculators which calculate the customer's attitude to various levels of risk having answered a series of questions.

b) Profiling for marketing purposes.

When we seek to contact you about other services, as outlined above, we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

c) Establishing affordability and providing quotations for financial services products.

Cookies

Our website only uses cookies that are strictly necessary for it to work. Please see our Cookie Policy, available on our website, for details of the cookies we use.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 086 811 4566 or email elio@eslifestylefinancialplanning.ie

Privacy policy statement changes

ES Mortgage and Financial Services Ltd trading as ES Lifestyle Financial Planning 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.

This policy was reviewed 18/11/2026