

Privacy Statement

Who we are:

McLaughlin & Greaney Ltd t/a Future is a financial services advisor, providing advice, services and a range of products in the areas of financial planning, pension, savings and investments, family and business protection and health insurance.

This Privacy Policy describes what Personal Data we collect, how we handle it, why we need it and who we share it with. It is the intention of this Privacy Statement to explain to you the information practices of McLaughlin & Greaney Ltd t/a Future in relation to the information we collect about you.

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. We will always clearly identify ourselves in correspondence and on our website. You may visit our website without identifying yourself or revealing any personal information. McLaughlin and Greaney Ltd. t/a Future collect domain information from your visit to customise and improve your experience on our website. This website may collection 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 side 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:

- McLaughlin & Greaney Ltd t/a Future, 5 Merchants Rd., Galway. H91 K6YN.
- Our contact details are: Telephone – 091 549000. Email: info@future.ie. Website: www.future.ie
- When we refer to ‘we’ it is the Company – McLaughlin & Greaney Ltd., t/a Future

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.

Purpose for processing your data

We collect Personal Data in order to arrange transactions on your behalf as agreed with you, to service our customers, assist with claims and the payment of plan benefits. We must have a lawful basis to collect and use information.

Personal information needed for plan contracts is held and used to:

1. Process your application
2. Set up and issue your plan
3. Provide you with information about your plan
4. To help the administration of your plan and assist with the payment of your plan benefits
5. To provide customer care and service

6. To contact you to inform you of any relevant actions you may need to take

Required by Law

We use your personal information to comply with law and regulations such as reporting to regulators, keeping proper records. We must collect certain personal information to comply with Anti-Money Laundering Law. The information collected will depend on your type of plan. To do this we use your name, your date of birth, address, nationality and occupation type.

To comply with the Law:

- We require up to date proof of identification and address
- Screening of all customers against Financial Sanctions and Politically Exposed Persons (PEP) lists
- Where required we carry out searches of publically available information

You must give us your tax residence information and tax identification number for tax reporting with product producers.

In order for us to give you updates and information on your plan, we use your plan number and contact details. To receive financial advice from us, you must give us personal and financial information for your current and future needs to be assessed. This enables us to recommend the most suitable product for you. This also involves creating new and assumed personal information about you. We complete an analysis using your personal information to comply with regulations. When you give us your personal information we will check to see if we already have a record of you. This helps us to comply with your Data Protection Rights.

How will McLaughlin and Greaney Ltd. t/a Future use the personal data it collects about me?

We 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.

Generally we may collect your data for one or more of the reasons below

- To respond to your request for advice on products or queries in relation to same
- To review your policies as required
- To recommend products that protects your lifestyle e.g. protecting your family in the event of death
- Planning for your financial future e.g. retirement funding, savings and investments

When we collect information about you we will 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.

Special Categories of personal data

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

Who are we sharing your data with?

You provide us with your personal information directly when you contact us, complete our forms, speak with us, visit our website and social media accounts. For more information on what personal information is collected and used on our website please see our Website Privacy Policy @ www.future.ie. We also get personal information from employers where relevant.

We may share your Personal Data and in accordance with Legal requirements pass personal information to companies that act as service providers under contract with us and only process your information as instructed by us. Your personal information is transferred securely and is not used by other parties for any other reasons.

Our Data Processors and Controllers are as follows:

Irish Life Assurance Co and Irish Life Health	Zurich Life Assurance Co
New Ireland Assurance Company	Royal London
Wealth Options	Davy Fund Managers
Independent Trustee Company Ltd	Permanent TSB plc
Investec Bank plc	Standard Life Ireland
Friends First	Phoenix Ireland
Aviva Life & Pensions Ireland	Cantor Fitzgerald Ireland Ltd
Merrion Solutions Ltd	

We may also share your Personal data with third party service providers contracted to McLaughlin & Greaney Ltd. t/a Future including; Document Management Services, CRM System – Money Advice, Financial Sanction and PEP screening, Trustee Services appointed in connection with specific Group Pension Schemes. All our third-party service providers are required to take appropriate security measures to protect your Personal Data in line with our policies. We do not allow our third-party service providers to use your Personal Data for their own purposes. We only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

A GDPR check list has been issued to our third party processors to ensure they are complying with GDPR Regulations.

In addition, we may disclose your Personal Data with third parties:

- In the event that we sell or buy a business/ assets, in which case we will disclose your Personal Data to the proposed seller or buyer of such business or assets at an appropriate time
- If we or substantially all of our assets are acquired by a third party, in which case Personal Data held by us will be transferred assets
- If we are under a duty to disclose or share your information in order to comply with any legal obligation, court order or to co-operate with state bodies , enforce this Privacy Policy or apply

our terms of use and other agreements, or protect our rights, property, safety customers or others. This includes without limitation, exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

Do we transfer your personal information outside the EU?

Yes, the information we collect may be used, stored and processed in the EU, UK, United States, Switzerland or in any other country in which McLaughlin Greaney Ltd t/a Future does business. By providing the information via the website, you are consenting to the transfer of the information outside of your country to any country (including countries which may not have adequate levels of protection). McLaughlin Greaney Ltd t/a Future may disclose information it has collected about you on the website, if required to do so by law, or when necessary to protect the rights of McLaughlin Greaney Ltd t/a Future or its employees

Retention of your Personal Data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. McLaughlin & Greaney Ltd t/a Future will process personal data in accordance with our retention schedule and hold your personal data for as long as you have a relationship with us and thereafter for a period of 7 years in order to comply with Regulation, as set out in our Data Retention Policy.

What are your rights with respect to your Personal Data?

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 know what personal information we hold about you and to receive a copy of your personal information. We must tell you :
 1. Why we hold it
 2. Who we pass it to, including whether it was transferred outside the EU
 3. How long we keep it for
 4. Where we got it
 5. If we carried out any automated decisions and if so the logic behind it and what it means to 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** – You can have your personal information deleted if it is incorrect or has been processed unfairly or unlawfully. If you have withdrawn consent you can ask for your personal information to be deleted. We will keep a record of your request so that we will know why your personal information was deleted. If we have provided a regulated product or service to you, we must keep your personal information for a minimum period required by law.
- **Right to restriction/objection of processing** – You can restrict or object to any unfair and unlawful collection or use of your personal information. You can object to any automated decision making that has a legal or similar significant impact for you and as for the decision to be made by a person. You can withdraw consent and object to for example direct marketing.
- **Right of portability** – You can ask for a copy of all personal information that you gave us and which we hold in an automated format. You can receive this in a machine readable format

that allows you to keep it. You may also request that we send this information to another company.

- **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 to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that McLaughlin & Greaney Ltd t/a Future refuse your request under rights of access we will provide you with a reason as to why.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by McLaughlin and Greaney Ltd. t/a Future or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Organisation Name's data protection representatives Data Protection Officer / GDPR Owner

Privacy Policy statement changes

McLaughlin and Greaney Ltd. t/a Future 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 privacy policy.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 091 549000 or email info@future.ie