



LHK Financial Privacy Policy

LHK Financial is committed to respecting and protecting your privacy and would like you to feel safe when you give us your personal details. We will always clearly identify ourselves in correspondence and on our website.

This Privacy Policy will inform you of the information we gather and how it is used. LHK Financial maintains the same privacy practices with respect to data that is collected off-line and on-line and this notice also covers both those methods of data collection and use. LHK Financial complies with the EU General Data Protection Directive (GDPR) for the collection, use, and retention of all personal data.

Data Controller

The data controller is LHK Financial referred to as “we”, “us”, “our” or, “LHK Financial” in this policy.

What personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, date of birth, contact details, payment details and information about your access to our website.

In general, you may visit our website without identifying yourself or revealing any personal information. LHK Financial collects domain information from your visit to customise and improve your experience on our website. Our website may collect 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 site, if applicable.

We use this information to better understand how our website is being used so that we can improve its performance. Some portions of this website may request that you give us information about yourself, from which we are able to identify you, such as your name, email or other address.

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin) we will ensure we will obtain your explicit consent, ensure the personal data is necessary for employment rights or obligations and/or is necessary for the legitimate activities with appropriate safeguards. The Data Protection Bill 2018 expressly allows for the processing of criminal history data for risk assessment and fraud prevention.

Why do we need to collect and store personal data?

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to life and pension products. To provide you with relevant information, respond to your requests we sometimes request that you provide us with information about yourself (this can range from name, date of birth, to claims history etc). This personal data is used for legitimate business purposes. We are committed to ensuring that the information we collect and use is appropriate for this purpose, is the minimum data that is needed for the particular purpose, is not retained for any longer than required under legal requirements (Consumer Protection Code 2017) and does not constitute an invasion of your privacy. We will retain all that data on our secure client management software platforms for the next relevant transaction date so that you are not asked to provide the information again and at that stage the information can be updated if needs be.

Use of the information we gather

When we collect information about you, we intend to 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, in which case you may still be able to access other parts of this website, although you may not be able to access certain services. In certain areas of our website, we may, where appropriate, enable you to 'opt in' to certain uses of your information e.g. personal data and direct marketing.

The information we collect about you or your computer is used to run the website, respond to your requests or process any transactions you have requested. It may also be used to verify your identity, send you information or contact you in relation to an LHK Financial product or service that you

are using or that we believe may be of interest to you after you have chosen to 'Opt in' to receive such communications.

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. We will process personal data in accordance with business requirements. When we no longer need your personal data, we will securely delete or destroy it. We will also consider if we can anonymise your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

Sharing Information with Third Parties

In certain instances, 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 with information that is necessary for them to perform the services and we take measures to protect your information. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Irish and EU law on data protection rules. When they no longer need your data to fulfil this service, they will dispose of the details in line with our procedures.

We may share your personal data with the following third parties for the purpose described in this Privacy Policy:

- Insurance Companies, Wholesale Brokers
- Solicitors, accountants and business consulting partners
- Our accounting software provider
- Our secure client management software providers

If we transfer your 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 the condition that enforceable data subject rights and effective legal remedies for you the data subject are available.

Data security

The intent of LHK Financial is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. The personal data you share with us on our website is protected by an SSL (Secure Socket Layer) certificate. SSL is the industry standard method of encrypting personal information so that it can be securely transferred over the internet. We have taken appropriate steps to safeguard and secure information we collect online, including the use of encryption when collecting or transferring sensitive data.

We use a complexity network password policy. Passwords are changed every 90 days, minimum 7 characters and complexity enabled. Remote Access is controlled by VPN Clients and site to site VPN from our Drogheda office. All controlled via firewall and active directory authentication.

Data Subjects Rights

We facilitate our clients' rights in line with the data protection policy and the subject access request procedure. This is available on request by contacting us at the contact details found at the end of this statement.

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 also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** – in the event that we refuse your request under rights of access, we

will provide you with a reason as to why. You have the right to complain as outlined in below.

If you wish to exercise these rights, please contact us at the following address:

Rosemount House
Dundrum Road
Co. Dublin
D14 P924

Alternatively, contact dataprotection@lhkinsurance.ie.

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.

How to update and/or amend the personal information you have provided

You are entitled to know whether we hold information about you and, if we do (subject to certain limitations), to have access to that information and have it corrected if it is inaccurate or out of date. To exercise your Right of Access or to update your details under your Right of Rectification or Erasure please email your request to the contact address below with proof of identity.

Withdraw consent

If we are relying on your consent to process your data you can withdraw this at any time – this does not affect the lawfulness of processing based on your consent before its withdrawal.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by LHK Financial (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with the Data Protection Commission or another supervisory authority and LHK Financial data protection representatives at the contact details below.

Business Relationships

Our website contains links to other websites. LHK Financial is not responsible for the privacy practices or the content of such websites. LHK Financial uses pixels, transparent GIF files and other methods to

help manage online advertising.

Contacting Us

If you have any questions or comments about our privacy notice or practices, please contact us.

LHK Financial may modify or update this privacy notice from time to time at any time without prior notice. You can check the “Last Updated” date below to see when the notice was last changed. When such a change is made, we will post a revised version online. We encourage you to check this notice often so that you can continue be aware of how we are protecting your personal information. By using our services, you agree to this privacy policy.

Email: dataprotection@lhkinsurance.ie

Phone: (01) 2055600

This privacy policy was last reviewed on 10 May 2019.