



advice you can trust

Privacy Statement

This notice describes how we collect store,use and share your personal information. It also explains the rights you may have in relation to the personal information that we hold about you. It applies to personal information provided to us by you or others on your behalf

Introduction

AJ Short & Associates Ltd 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 AJ Short & Associates Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Paul Short
- Contact details: paul@ajshort.com by email, or 01 491 3131 by phone, or by post to 131 Rathgar Road, Dublin 6, D06 C3F6
- When we refer to 'we' it is AJ Short & Associates Ltd we are referring to , a company registered in Ireland. (registration number

Who are we?

AJ Short & Associates is a financial advisory firm specialising in personal financial planning. Our focus is on the following*

- Pensions – Pre & Post Retirement Planning
- Investments – Ranging from Equity based to Deposit based investment solutions
- Life and Serious Illness Cover/Mortgage Protection/Income Protection
- Mortgages
- Financial Planning

With over 30 years' experience in the insurance and financial services industries we can help you find the most appropriate financial solution to suit your specific need.

We strive always to offer you clear and professional financial advice to assist you in managing your finances and plans for the future.

A.J. Short & Associates is regulated by the Central Bank of Ireland. We are therefore duty bound under the consumer protection code to identify and offer you the best financial product from our product providers to suit your needs.

Our Data Protection Representative can be contacted directly here:

- Lisa Byrne
- lisa@ajshort.com
- 01 491 3131

Purpose for processing your data

We will use the personal data which you provide to us to:

- Review and make recommendations about the products you hold with us
- Decide how suitable other products we offer may be for you
- Provide quotes to you for products we have discussed or you have enquired about
- Apply to product providers for any product you engage us to effect on your behalf
- Market to you, where you have given us permission to, in respect of our suite of products, which we believe may be of interest to you

Why we are processing your data? Our legal basis.

In order for us to provide you with appropriate financial advice and products AJ Short & Associates Ltd need to collect personal data for mortgage, protection, pension & investment application purposes. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – AJ Short & Associates Ltd needs to process your data as this is necessary in relation to a contract of insurance or loan facility which the individual has entered into, or because the individual has asked for something to be done so they can enter into a contract.

For example:

- Personal, medical and/or financial information is required pursuant to the underwriting process of insurance providers in respect of pension, investment, income protection, life & critical illness cover quotes and applications
- Financial and personal information is necessary to fulfil the requirements of a mortgage loan application

In any event, AJ Short & Associates Ltd 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 AJ Short & Associates Ltd use the personal data it collects about me?

AJ Short & Associates 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.

All data is processed at our offices located at 131 Rathgar Road, Dublin 6.

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 ensure the below

- we will obtain your explicit consent

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to AJ Short & Associates Ltd 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 AJ Short & Associates Ltd procedures.

If we need to pass your sensitive personal data onto a third party, for example in the course of an application process, 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 (with your permission) to are:

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- Aviva Life & Pensions
- BCP Asset Management DAC
- Blackbee Investments Limited

- Cantor Fitzgerald Ireland Limited
- Friends First Life Assurance Company DAC
- Investec Bank plc
- Irish Life Assurance plc
- KBC Bank Ireland plc
- Merrion Stockbrokers Limited
- New Ireland Assurance Company plc
- Permanent TSB plc
- The Royal London Mutual Insurance Society Limited
- Wealth Options Limited
- Zurich Life Assurance plc

All third party processors with whom we hold an agency agreement have confirmed to AJ Short & Associates Ltd that they will keep your information confidential and respect the law on Data Protection.

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

AJ Short & Associates Ltd facilitates you, our client's, 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 also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that AJ Short & Associates Ltd 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. AJ Short & Associates Ltd will process personal data in accordance with our retention schedule.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and AJ Short & Associates Ltd's data protection representatives Lisa Byrne/ Paul Short (data controller)

Failure to provide further information

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

Profiling – automatic decision making

Profiling;

As financial and mortgage advisors we use profiling in our business, as follows:

- a) Risk profiling – to establish a client's attitude to investment risk
- b) Profiling for marketing purposes – to contact clients with their permission about other products/services
- c) Establishing affordability and providing quotations for financial services and mortgage products

Additional Processing

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 01 491 3131 or email dataprotection@ajshort.com

Privacy policy statement changes

AJ Short & Associates Ltd 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.

This privacy policy is effective from 25th May 2018.