



THE MORTGAGE ARCHITECT

Introduction

Bobby Mortgage Intermediary Limited trading as The Mortgage Architect 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 Bobby Mortgage Intermediary Limited trading as The Mortgage Architect in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Robert O'Sullivan – Managing Director
- Contact details of Robert O'Sullivan are 021-4882957 or info@themortgagearchitect.ie
- When we refer to 'we' it is Bobby Mortgage Intermediary Limited trading as The Mortgage Architect

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?

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Mortgage Protection and Mortgages. We provide our services from the selection of products provided by the Companies and Lenders we have agencies with. We recommend the product that, in our professional opinion, is best suited to you. In providing this service to you we will need to obtain personal information from you the following outlines how we deal with this information and how it is used. Any questions or concerns you have can be addressed to us directly.

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

- Name: Robert O'Sullivan
- Email address: info@themortgagearchitect.ie
- Phone number: 021-4882957

Purpose for processing your data

- To give you information on and provide you with recommended financial products.
- Disclose data to the policyholder, the life assured, beneficiary, trustee, assignee, successors, group company or to other parties.
- To comply with legal and regulatory requirements including Anti-Money Laundering and Sanctions compliance.
- To understand how people interact with our websites (if applicable).
- To carry out and determine the effectiveness of advertising, and of marketing campaigns.

Why we are processing your data? Our legal basis

In order to provide you with our services of Mortgage Protection & Mortgage's it is necessary for us 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



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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, Bobby Mortgage Intermediary Limited trading as The Mortgage Architect 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 The Mortgage Architect use the personal data it collects about me?

Bobby Mortgage Intermediary Limited trading as The Mortgage Architect 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, 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?

In order to provide our services and to comply with legal obligations imposed on us, we may share your information with:-

- Pension Trustees, & beneficiaries of Pensions & other Financial Products, Relatives & guardians, (in certain circumstances and within the law)
- Legal, financial, investment, medical, & other professional advisors in the process of submitting your application on the various.
- Businesses that refer your business to us.
- Any business which we are required by law to share the information with, ie compliance resource companies.
- Database provider all data encrypted
- Insurance and Assurance companies we have agencies with
- An Garda Síochána.(Anti Money Laundering)
- Central Bank of Ireland. We are authorised by Central Bank and they have the right to inspect our files.
- The Financial Services Ombudsman. In the event of a complaint.
- Data Protection Commissioner
- Lenders

We may pass your personal data on to third-party service providers contracted to Bobby Mortgage Intermediary Limited trading as The Mortgage Architect 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 Bobby Mortgage Intermediary Limited trading as The Mortgage Architect 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.

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.



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Data Subjects Rights:

Bobby Mortgage Intermediary Limited trading as The Mortgage Architect 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**
- **Right to judicial review:** in the event that Organisation Name 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 they were obtained. Bobby Mortgage Intermediary Limited trading as The Mortgage Architect will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (xxx) and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Bobby Mortgage Intermediary Limited trading as The Mortgage Architect or how your complaint has been handled, you have the right to lodge a complaint with the Organisation Name's data protection representatives Data Protection Officer / GDPR Owner.

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

Data Protection Commission
Canal House,
Station Road,
Portarlinton,
Co. Laois, R32 AP23
Phone: + 353 57 868 4800 / + 353 761 104 800
Fax: + 353 57 868 4757
Web: www.dataprotection.ie
Email: info@dataprotection.ie



Failure to provide further information

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

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 021-4882957 or email us: info@themortgagearchitect.ie

Privacy policy statement changes

Bobby Mortgage Intermediary Limited trading as The Mortgage Architect 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 was last reviewed in April 2021.