



## Privacy Notice

This is the Privacy Notice of Cascade Financial Services Limited trading as Nova Mortgages. Cascade Financial Services Limited trading as Nova Mortgages is regulated by the Central Bank of Ireland.

We are committed to respect and protect your privacy and would encourage you to feel safe when providing us with your personal details. Transparency is fundamental in the manner in which we process your data and we reflect our accountability with the General Data Protection Regulations (GDPR), not solely in relation to the processing of your data but also highlighting your rights as a client. We will always clearly identify ourselves in correspondence. Please read this Privacy Notice to understand how and why we collect and use your personal information.

Nova Mortgages complies with the requirements of the relevant Irish legislation, namely the Data Protection Acts 1988 - 2018, and the General Data Protection Regulation.

### **The GDPR Is Underpinned by Six Important Principles Requiring That Personal Data Be:**

1. Processed lawfully, fairly and in a transparent manner;
2. Collected for specified, explicit and legitimate purpose;
3. Adequate, relevant and limited to what is necessary;
4. Accurate and where necessary, kept up to date;
5. Retained only for as long as necessary;
6. Processed in an appropriate manner to maintain security.

### **Collection and use of Personal Data**

We use the information you provide to provide advice and arrange transactions in relation to mortgages, life assurance products, pensions, investments and insurance based investment products, as well as assisting you with the ongoing management and administration of any or all contracts you hold with us. We will only request information that is based on a lawful reason to collect and use personal information in the execution of such services.

### **Required for your Contract**

We fundamentally collect and process various levels of personal information to provide you with the regulated financial service you have requested us to provide. Personal information may include:

- Your name, address, date of birth and contact details
- information about your family & lifestyle (such as dependents, marital status, nationality) & depending on the Plan type, information about your health)
- information surrounding your financial circumstances, inclusive of salary details, assets & liabilities, existing contracts, investment experience, needs & goals.
- Employment information
- Your PPS Number
- Financial information inclusive of bank account details.
- With the exception in relation to certain specific features of our website, you do not have to provide us with any personal data to use our website. However, where you offer your



personal data through our website via online feedback forms or web email then we will treat your personal information in accordance with this notice.

### **Required by Law:**

We use your personal information to comply with current legislation and regulations such as:

- Reporting to regulators
- Keeping proper accounts and records.

In order to adhere to regulations we are required, by law, to collect certain personal information to comply with Anti Money Laundering legislation. This information necessary will depend on the action being undertaken and the form of service being provided. Information we may require includes:

- Proof of ID by way of passport/driving licence
- Utility bill as proof of address
- Screening of all customers against Financial Sanctions and Politically Exposed Persons (PEP) lists.
- Where needed we carry out searches of publicly available information.

### **Information you provide us about others or information that others provide us about you**

If you provide us with information about someone else (e.g. information about a spouse or a financial associate/director) for the purposes of a joint application with that person, or someone gives us information about you, we may add it to any personal information we already hold and we will use it in the ways as outlined in this Data Privacy Notice.

Prior to disclosing information to us about another person, you should ensure that you have their agreement to do so. You should also make them aware of this Data Privacy Notice.

### **Special Categories of Data**

We may retain information we deem applicable about you which includes special categories of personal data such as details surrounding health for the purposes of Life Insurance/Serious Illness/Mortgage Protection or Income Protection applications. We will only store this data when we need it for the purposes of the services we provide you or where we have a legal obligation to do so.

### **When and how we collect information about you**

- At the initial contact, in order to determine your needs & objectives and recommend the most suitable solutions for you.
- As you use our services, apply for specific products, make enquiries and engage with us, information is gathered about you.
- When you or others give us information verbally or in writing. This information may be on application forms, in records of your transactions with us or if you make a complaint.

### **How we use your information**

If you want to receive tailored financial advice from us, you must provide appropriate personal and financial information for your current and future needs to be assessed in the process of our service delivery. This allows us to recommend the most appropriate financial solutions for you. As stated, we complete an analysis of you using your personal information to comply with current regulations.



We use your personal information, only for appropriate purposes, for the actions being taken as shown below:

- To determine your needs & objectives
- To process any applications associated with the provision of specific services e.g. to arrange a mortgage
- Contact you by post, phone, text message or email with your explicit consent
- Manage and respond to a complaint or appeal received within stated timeframes.

Please note that where you provide us with your personal information, (e.g. name, e-mail address, work address, telephone and mobile phone numbers and/or other contact information), through a facility provided on our website or directly to us by e-mail, you consent to us;

- Processing and administering your personal data to perform all necessary actions to give effect to your request or instruction; and
- Retaining a record of incoming and outgoing communication (e.g. email)

Information in the email we receive and send will not be disclosed to any third party without the permission of the sender unless otherwise in accordance with the Data Protection Act.

#### **Your consent**

You need to provide consent for us to collect and use your personal information. When we collect your information we will explain what we need it for and how you can change your mind in the future. If we process your personal information based on consent, you have the right to withdraw that consent at any time.

#### **Data security**

Nova Mortgages intends to strictly protect the security of your personal information; use it in accordance with its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken the necessary steps to safeguard and secure information we collect.

#### **Who we share your information with**

We will share your information with third party companies and individuals, and only as necessary, to facilitate our service. These third parties have access to your personal information only upon receipt of a relevant Application Form. Their use of such detail will only be relevant to perform tasks on our behalf and are obligated not to disclose or use it for any other purpose in accordance with the General Data Protection Regulation and the Irish Data Protection Act 2018.

We may be obliged to share your information with our regulators to comply with our regulatory or legal requirements or yours. Our service providers (e.g. accountants or auditors) may have access to your information in the course of providing services to us. We have processes in place to ensure that any such service providers have adequate data protection procedures in place.



### **Do we transfer your personal data information outside of the EU?**

Your personal information is processed and retained within the EU.

### **How long do we hold your information**

The length of time we hold your data depends on multiple factors, including regulatory rules and the type of financial product/service we provided to you.

These factors include:

- The regulatory rules contained in the laws and regulations or set by authorities like the Central Bank of Ireland for example, in the Consumer Protection Code.
- The type of financial product/service we have provided to you. For example, we may keep data relating to a pension contract for a longer period compared to an investment contract.
- Whether you and Nova Mortgages are in a dispute with another entity, person or each other.
- The type of data we hold about you.
- Whether you or a regulatory authority asks us to keep it for a valid reason.

In most cases, in order to comply with regulatory obligations, personal data is retained for 6 years.

### **How to exercise your information rights**

Providing and holding personal information comes with both significant rights on your part, as well as a fundamental obligation on the part of Nova Mortgages. You have several rights in relation to how we use your information and we have listed these rights below:

#### **Right to Access**

You have the right to know what personal information we hold about you and to receive a copy of your personal information. In order to exercise this right please contact us by email at [dcurry@novamortgages.ie](mailto:dcurry@novamortgages.ie) or by telephone at 01 5079647.

We are obliged to respond to access requests without undue delay. In most instances, we will respond within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will communicate the reasons for such delays.

#### **Right to Correct and Update**

You can request that inaccurate information is corrected and incomplete information updated.

#### **Right to Delete and be Forgotten**

The right to have your data deleted or its use restricted– you have a right to this under certain circumstances.



### **Right to information**

You have a right to the information set out in this Privacy Notice. We will inform you of our updated Privacy Notice, if we change the type of personal information we collect and/or how we may use it. We have controls in place to protect your personal information and minimise the risk of security breaches. However, should any breaches result in a high risk for you, we will inform you without delay.

### **Right to Restrict or Object**

You have the right to object to particular uses of your personal information where the legal basis for our use of such detail is for our legitimate business interests. In doing so this may have an impact on the services we can/are willing to provide

### **Right to Portability**

You have the right to ask for a copy of all personal information that you have provided Nova Mortgages with and which is held in an automated format. You can receive this in a machine readable format that allows you to keep it. You may also request Nova Mortgages to send this personal information in a machine readable format to another Company. The format will depend on our ability to provide this in a secure way that protects your personal information. Nova Mortgages will also need your most up to date personal information for underwriting and to comply with current regulations.

### **Withdraw Consent**

You have the right to withdraw consent to the usage of your personal information at any time where processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.

### **You can contact the Office of the Data Protection Commissioner at:**

**Website:** <https://www.dataprotection.ie/docs/Contact-us/b/11.html>

**Telephone:** +353 (0)761 104800 or Lo Call Number 1890 252 231

**Fax:** +353 57 868 4757

**E-mail:** [info@dataprotection.ie](mailto:info@dataprotection.ie)

**Postal Address:** Data Protection Commission, Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois.

### **How to contact us**

If you have any questions or comments about how your personal data is gathered, stored, shared or used, or if you wish to exercise any of your data rights, please contact us at

Telephone: 01 5079647

Email: [servicing@novamortgages.ie](mailto:servicing@novamortgages.ie)

Postal Address: Pembroke Hall, 38/39 Fitzwilliam Square West, Dublin 2, D02 NX53.

### **Changes to this Notice**

This Data Privacy Notice is valid from 26<sup>th</sup> November 2021. We may modify or update this Privacy Notice from time to time.