Data Privacy Notice

MORTGAGELINE
Good People Sound Advice

Northwood
FINANCIAL PLANNING

Data Privacy Notice (effective from 16/09/2025)

Introduction & how to contact us

This is the Data Privacy Notice of Stephen Hamilton Financial Services Ltd trading as MortgageLine and Northwood Financial Planning (also referred to as the firm, we, our, us) and provides information about the ways in which the firm collects and uses personal data. Please read this Data Privacy Notice to understand how we obtain and use your personal information. We may update our Data Privacy Notice from time to time. We will notify you of any changes by providing a copy of our Data Privacy Notice at our next meeting. If you have any questions about this Data Privacy Notice, or you have any queries about your data, please email admin@mortgageline.ie or you can write to us at the address above.

Law and Regulation

For the purposes of data protection legislation, the *Data Controller* of your personal data is Stephen Hamilton Financial Services Ltd trading as MortgageLine and Northwood Financial Planning The firm complies with the Irish Data Protection Acts, the General Data Protection Regulation (GDPR) and the ePrivacy regulation. Stephen Hamilton Financial Services Ltd trading as MortgageLine and Northwood Financial Planning respects the rights of data subjects in all interactions and is committed to always protecting your privacy in accordance with data protection legislation.

How we obtain and use your personal information

You provide us with your personal information directly when you contact us, complete our forms, email and write to us, visit our website and social media accounts, or when you speak with us. We may get personal information from external sources which can include, public registers, solicitors, employers, trustees, medical professionals, legal or regulatory bodies (where relevant as appropriate).

We collect and use personal information 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 personal information (this are explained later in this document).

We collect health information such as information about your health status, medical records and medical assessment outcomes; We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol), medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information.

Except in relation to certain specific features of our website, you do not have to provide us with any personal information (or personal data) to use our website and where we use cookies, we will inform you via our cookie consent banner. However, where you elect to give us your personal data through our website via online contact/feedback forms or web email then we will treat your personal information in accordance with this Data privacy Notice. Further information on cookies data collection is set out below.

We may also create new personal information about you based on information you have given us and through your interactions with us, e.g. creating a client risk profile to determine risk appetite, interpreting client data for suitable products and recommended actions, or for client segmentation / categorisation for future servicing purposes. For more detailed information on what personal information is collected and how it is used when using our website please see later in this document.

Information in the communications we receive from, and send to, you will not be disclosed to any third party without the permission of the sender unless otherwise stated in this Data Privacy Notice or in accordance with the Irish Data Protection Acts and the GDPR.

Security and Storage of data

Stephen Hamilton Financial Services Ltd trading as MortgageLine and Northwood Financial Planning takes seriously its security obligations in respect of your personal data under the Data Protection Act and the GDPR with regards to protection and keeping it secure, to prevent unauthorised access to, alteration, loss or destruction of all personal data in our possession. All information you provide to us is stored securely.

Do we transfer your personal information outside of the EU?

Your personal information is processed and stored within the EU.

How long do we keep your personal information for?

We will keep and use your personal information for as long as you have a relationship with us. We also hold it after this, e.g., where we need to for complaints handling, for system back-ups needed for disaster recovery and for as long as we must for compliance with regulations and law e.g., six years under the Consumer Protection Code (CPC).

To whom do we pass your personal information?

We reserve the right to access and disclose personal data in compliance with Data Protection Legislation and when engaging with our service providers.

Our Service Providers

We use service providers to help us provide financial services to our clients. We employ third party companies and individuals to facilitate our services. These third parties have access to your personal information only to perform these tasks on our behalf and are strictly 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. Where we employ third parties who access your data in this way (on our behalf), they are subject to a comprehensive due diligence and strict contractual restrictions to ensure that your data is always protected and secure and in compliance with Data Protection legislation.

A full list of the service providers and data processors to whom we pass your personal information is available on request. The reasons your personal information may be shared include the following:

Data Processors:

Data processors include product providers to which we pass your information to for the purposes of setting up a contract for you, or to arrange, on your behalf, transactions you have requested or agreed upon. Depending on the product, the processing may be subject to automated decision-making, but we will explain the logic involved and what it means for you. You have the right to object to automated decisions and have a person review your data.

We also employ companies that act as service providers under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used by any other parties or for any other reason. The categories of services that we use other Data Processors for, include CRM systems for document management and administration, customer services and cloud storage systems, IT services and support, client screening for AML purposes including Financial Sanctions and PEP screening.

Other Data Processors to help us comply with our statutory, regulatory and compliance obligations.

We employ third party companies and individuals to facilitate our website and to perform service-related services or to assist us in analysing how our services are used/viewed, e.g. an internet service provider or website developer. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose in accordance with the GDPR and Irish Data Protection Act

Trustees & Employers:

Appointed / in connection with the plan contract.

Legal or regulatory bodies and compliance systems:

Includes the Central Bank of Ireland, the Revenue Commissioner, the Data Protection Commissioner, An Garda Siochana, GoAML, and other compliance checks as needed to comply with our obligations under regulation and law.

Lawful basis we rely on to collect and use personal information includes:

Where we collect your personal information, we will make this Data Privacy Notice available to you. Please note that where you provide us with your personal information, we advise you are consenting to us:

- Storing, processing and administering your personal data, to perform all necessary actions, to give effect to your requests or instructions; and
- Retaining a record of the above including records of incoming and outgoing communications (e.g., Phone, email, post, or text messages) in accordance with our Data Retention Schedule.
- This does not affect your data protection rights.

Consent and how to withdraw consent

Where processing is permitted because the data subject has given consent to the processing for one or more specific purposes. Such consent must be “opt-in”, freely given and clearly understood. If we process your personal information based on consent, you have the right to withdraw that consent at any time and this will be explained when you give us your consent, i.e., you can change your mind and withdraw consent by contacting us directly.

Please note, if you withdraw your consent, which was necessary and required to provide financial services to you, we will not be able to continue providing those services and if storage/processing needs to continue, we will explain why.

Your Consent

You need to give consent for us to collect and use personal information and your explicit consent in the case of your special category personal information (classed as sensitive data). You are given the choice to provide consent, or not. When we collect your consent, we will explain what we need it for and how you can change your mind in the future.

Consent for the firm to collect and store your personal information to be able to provide you with financial services, advice and to allow us to make suitable recommendations for you. In order to receive financial advice from us, you must give personal and financial information for your current and future needs to be assessed. This enables us to recommend the most suitable financial product for you.

This also involves creating new and assumed personal information about you. We complete an analysis of you 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.

Your information will be held for that purpose, and should you purchase a plan, the information will be used to offer you an ongoing service of that plan. We also may contact you for follow up financial reviews even if you do not proceed with a recommendation.

Consent to Direct Marketing

We would like to be able to contact you about offers and services, separately from your plan communications. We will only send you direct marketing content where we have your consent, e.g. marketing or promotional emails / newsletters / texts.

Consent to sharing your personal information with third parties

We may seek your separate consent, where appropriate, to share your information to third parties regarding products and services offered by other organisations that you have requested, or to tell you about additional services that may be of interest to you.

Consent to Profiling

Profiling for targeted advertising or promotional purposes.

Needed for a plan contract

We need to collect and use your personal information to provide your plan contract. This processing is necessary for the performance of a contract or to take steps at your request before entering a contract. This includes, but is not limited to, your name, date of birth, contact information, financial and bank account details. Depending on the plan type this can also include health, employment, PPSN, pension and salary information, your tax residence information and tax identification number for tax reporting with product producers.

We restrict access to, and use of, any sensitive personal information. We may also create new personal information. Personal information needed for plan contracts is held and used to (but not limited to)

- process your application, set up and issue your plan
- provide you with information about your plan (we use your plan and contact details)
- to help the administration of your plan and assist with claims and the payment of your plan benefits
- provide customer care and service; and
- 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, which includes but is not limited to:

- reporting to regulators
- keeping/maintaining proper books and records,
- carry out internal reporting,
- quality checking, compliance controls and audits to help meet our obligations.
- to comply with anti-money laundering law and fulfil our obligations Where needed, carrying out searches of publicly available information

Our Legitimate Interest

We use and process your personal information for our legitimate interests as shown below. This doesn't affect your data protection and privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions using the above contact details of this Data Privacy Notice.

- Maintaining business records
- Security and training purposes
- Preventing fraud
- Statistical Analysis: We combine and group personal information for analysis to help us understand our customers and develop better services for you.
- We use summary information to help promote our services and products from our product providers.
- We use our customer personal information, including yours, to identify the target market for our regulated services.

Marketing

From time to time Stephen Hamilton Financial Services Ltd trading as MortgageLine and Northwood Financial Planning may send marketing emails and newsletters to consenting persons. We would like to be able to contact you about offers and services, separately from your plan communications. We will only send you direct marketing content where we have your consent.

Using our website

The following information relates to our data privacy practices in connection with our website. When you visit our website, we do collect, personal data on you. This technical data may be used for administrative and statistical purposes and may be shared with our internet service provider / website developer. We may use this information to help us to improve our website. This technical data does not provide us with the identity of the owner of the personal data when visiting our website.

All that we may know about your visit may be limited to technical data (log data) such as;

- The logical address (or IP address) of the server you used to access our website
- The top-level domain name from which you access the internet (for example .ie, .com, .org, .net)
- The previous website address from which you reached us
- The type of web-browser you used
- Web traffic data (the amount of data sent and received) by visitors to a web site. This is determined by the number of visitors and the number of pages they visit, specific pages of our website that you visit, the time and date of your visit, the time spent on those pages and other statistics

Behavioural Remarketing

Our firm uses remarketing services to advertise to you which requires explicit user consent via the cookie consent banner on our website. These services are Google Paid Ads (previously Google AdWords) and Google Analytics remarketing service is provided by Google Inc. We use Google AdWords to create and manage online advertising campaigns, and we use Google Analytics to track and analyse our website traffic. Also, involve Facebook/Instagram(Meta Platforms) You can opt-in and withdraw your consent by means of the cookie consent banner (non-essential cookies) or settings on our website. For more information on the privacy practices of Google, please visit Googles Privacy and Terms web page. A list of cookie details are outlined below.

Cookies

We use "cookies" to collect information when you use our website. We do not collect or store personal information without notifying you via a cookies pop-up consent banner, when you visit our website. You can change the settings on your browser to refuse all cookies or to indicate when a cookie is being sent. However, you should note that disabling cookies may result in some parts of the site not working properly and you may not be able to use some portions of our services.

Strictly Necessary

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Marketing

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Statistical

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information

Name	Provider	Purpose	Expiry
Strictly Necessary			
cookiePreferencesSet	mortgageline.ie	To track whether or not a user has accepted cookies	365 days
functionalOptIn	mortgageline.ie	To track whether or not a user has accepted functional cookies	365 days
performanceOptIn	mortgageline.ie	To track whether or not a user has accepted performance cookies	365 days
marketingOptIn	mortgageline.ie	To track whether or not a user has accepted marketing cookies	365 days
Marketing			
_gcl_au	Google	To store and track conversions	90 days
gclid	Google	To identify the specific click that lead to the user's first visit to our website (if user came from Google)	90 days
_gcl_aw	Google	To store and track conversions	90 days
_gat_UA-	Google	To read and filter requests from bots	Session
_ga	Google	To store and count page views	2 years
_fbp	Meta	To track views originating from Meta social platforms	Session
Statistical			
Hubspotutk	mortgageline.ie	Holds Hotjar User ID which is unique to the site	365 days

What are your Data Protection Rights?

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details in this Data Privacy Notice. You will need to give us some personal information to help us identify you and we will respond to you in line with current regulations. Any restrictions to your rights will be explained in our response.

Right to be informed

You have a right to the information set out in this Data Privacy Notice. The law requires us to tell you about your rights and our obligations to you regarding the processing and control of your personal data. We inform all persons, who provide their personal data to us, of these conditions by way of this Data Privacy Notice and request that you read the information provided in this document. If you give us personal information about someone else, please make sure you have their permission and make them aware of this Data Privacy Notice, as it also applies to them. We may update our Data Privacy Notice, for example, if we change the type of personal information we collect and / or how we use it, process or store it. We have controls in place to protect your personal information and mitigate the risk of security breaches. However, should any breaches result in a high risk for you, we will inform you without delay. We are happy to clarify any points or answer any questions you may have.

Right to Restrict or Object

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 and ask for the decision to be made by a person.

Right to Correct and Update

You can ask us to correct and update personal information we hold about you. Your plans are long term contracts and to provide you with the best service it is important we have your up-to-date personal information, including your contact details. We are not required to rectify or erase your data where to do so would prevent you from meeting your contractual obligations to us or where we are required to process (including retaining) your personal data for a lawful purpose in accordance with the General Data Protection Regulation and the Irish Data Protection Acts.

Right to Delete and 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 we 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 by law. This right does not affect the requirement to hold your information for the purposes of fulfilling a contract.

Right to Portability

You can ask for a copy of all personal information that you gave us (including through your interactions with 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 us to send this personal information in a machine-readable format to another company but will depend on our ability to provide this in a secure way that protects your personal information. We will not likely be able to use a copy of your personal information sent to us in this way from another company. This is because we can only collect personal information that we need and because we need your most up to date personal information for underwriting and to comply with regulations.

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. This right does not allow you to access personal information about anyone else. To access your personal information please write to us using the contact details in this Data Privacy Notice. To help us respond as quickly as possible please let us know if you are only looking to enquire whether our firm holds personal information about you, or if you are only seeking copies of specific personal information or a full data access request for a complete copy of your client file, e.g. all the information we hold about you. We will comply with a full data access request within one month of receiving your request. We must tell you,

- why we hold it,
- who we pass it to, including whether we transfer it outside the EU.
- how long we keep it for,
- where we got it from.

Data Protection Commission & your right to complain

It is preferred that all complaints should be address with the firm in the first instance, however, should you wish to report a complaint to the appropriate regulator or if you feel that we have not addressed your concern in a satisfactory manner, you may choose to refer your compliant to the Data Protection Commission.

Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland.
https://www.dataprotection.ie/en/contact/how-contact-us

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children") and we do not knowingly collect personal information from children. If you are a parent or guardian and you are aware that children have provided us with personal information, please contact us urgently and we will take immediate steps to remove that information.

Glossary of terms used

Personal data: or personal information, means information that relates to you (Data Subject) which can identify you. Personal data includes, but is not limited to, information such as your name, home address, work address, mobile phone, other phone, and fax numbers and/or other contact information, date of birth and Personal Public Service Number ('PPSN'). It can include the numbers of any policies you hold, your financial information, including details of any transactions completed for you. Personal data also includes any correspondence or other engagement you have with us or any of our service providers and any documentation connected to you or your policies that is held by us or on our behalf.

Special Categories of personal data: Personal data includes special categories of data which merit additional protection, such as data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and your genetic data, biometric data for the purpose of uniquely identifying you, or data concerning your health or sexual orientation. In addition, personal data includes data relating to criminal convictions and offences.

Data Subject: A Data Subject is a natural living person who can be identified either directly or indirectly, by reference to personal data.

Data Controller: A data controller is a person or company that's responsible for deciding how personal data will be processed and for what reasons. For example, this firm is a data controller for the personal data of our customers and staff.

Data Processor: A data processor is a person or company, usually a third party, that processes personal data on behalf of a data controller.

General Data Protection Regulation (GDPR): The GDPR is a European Union regulation which came into effect on 25 May 2018 and gives the Data Subject, more rights and control over their personal data and places more obligations on *Data Controllers* around how they use, process and store personal data.

Irish Data Protection Act: The Irish Data Protection Acts, comprised of the Data Protection Act 2018 and the Data Protection Acts 1988-2003, establish the legal framework for protection individuals privacy rights relating to their personal data in Ireland. The 2018 Act transposes / implements the GDPR.

Cookies: Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. Small pieces of information, stored in simple text files, placed on your computer by a web site. Cookies can be read by the website on your subsequent visits so that you can access information in a faster and more efficient way. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the web site can "remember" you on your return visit.

IP address: The identifying details for your computer (or your internet company's computer), expressed in "internet protocol" code. Every computer connected to the web has a unique IP address, although the address may not be the same every time a connection is made.

Web browser: The piece of software you use to read web pages. Examples are Microsoft Internet Explorer, Netscape Navigator, Firefox, Safari and Opera.