

Privacy Statement for Brokers Ireland Network Services Limited

Introduction

Brokers Ireland Network Services Limited 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 Brokers Ireland Network Services Limited in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Brokers Ireland Network Services Limited
- Contact details of 87 Merrion Square, Dublin 2. Tel: 01 4922203 email: Info@brokersirelandmortgages.ie
- When we refer to 'we' it is Brokers Ireland Network Services Limited

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?

Brokers Ireland Network Services Limited trading as Brokers Ireland Mortgage Services, formally named PIBA Mortgage Services is a network of mortgage brokers who united to provide their customers with greater choice and superior service. We are a non-profit organisation aimed at combining the efficiencies of a large national network with the personal service of a local Broker. We believe this is the best of both worlds for the consumer.

We have appointments with almost all lenders in the Irish Mortgage Market. This means through your appointment with Brokers Ireland Mortgages Services, Brokers can select the most suitable mortgage for their consumer from a wide panel of lenders even if they do not hold a direct appointment with such lenders.

We have invested in technology to create a system which will give instant analysis of mortgage products, comparison of what lenders will offer the consumer and online submission of mortgage applications for maximum efficiency. We also have dedicated mortgage underwriting and administrative staff to back up the expertise of the Brokers Ireland Mortgage Services.

Brokers Ireland Mortgage Services, formally named PIBA Mortgage Services, was initially formed under the auspices of the Professional Insurance Brokers

Association (PIBA) now referred to as Brokers Ireland. Membership of the mortgage network is exclusive to Brokers Ireland members. Brokers Ireland is the largest Insurance and Mortgage Broker representative body in Ireland.

Our GDPR Owner and data protection representatives can be contacted directly here:

- info@brokersirelandmortgages.ie
- 01 492 2203

How do we collect your information and what information do we collect?

The personal information we collect varies depending upon the provider selected. We will provide your representative with a minimum standards checklist for information and those categories of personal data needed to submit an application to a provider.

Our organisation collects personal data in the following ways:

- request a packaging service to submit an application to a provider on behalf of your representative/broker.
- Your representative will submit to us on your behalf via an online platform or email.

What information do we collect?

Client Data

The information we request your representative/broker to collect about you in order for us to submit to the lender selected includes the following:

1.	Contact and Identifying information , e.g., name, address, contact details; email, mobile, landline
2.	Unique identifiers e.g. <ul style="list-style-type: none">• PPS number – the reason why we collect your PPS number is for CCR checks.• insurance policy numbers, the reason why we collect this is for mortgage protection policies and building insurance to cover the property as per lender requirements.
3.	Demographic details , age, gender, marital status, lifestyle, and insurance requirements; date of birth, dependents, photo ID, as well as collecting personal information about

	you, we may also use personal information about other people, for example family members you wish to insure on a policy. E.g., your children/spouse
4.	Family and Beneficiary Data, e.g., dependents, Details of Solicitor/Tax Advisor/Accountant.
5.	Employment information e.g., role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history; This information is necessary for the lender/provider to process your application.
6.	Publicly available sources: e.g., Information about you in the public domain such as Director information from the Companies Registration Office
7.	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. These are unique to the declarations and for mortgage protection as an ancillary product needed for the application process.
8.	Pensions and Insurance Benefits information such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions,
9.	Financial details e.g., bank account details, details of your credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details.
10.	Claims Data (From you and any relevant third parties).
11.	Marketing preferences: these are part of the application deceleration and are provider specific.
12.	Searches: that we undertake in relation to sanctions, money laundering and credit checks. List PEP/AML/Sanctions search providers that you use

Purpose for processing your data

As an Introducing Mortgage Intermediary for Brokers Ireland Network Services, details of your firm and employee contacts within your firm will be retained on our CRM and Online application system. This data will be held on these systems to enable your firm to transact business with Brokers Ireland Network Services.

Client data is sent to us via our Online Application System or by email to our centralized mailbox. This data is inputted into various lender systems but will only be submitted to a lender with the clients prior approval by way of a signed declaration.

How do we use your personal data?

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for a mortgage application.

1.	Performing services for a broker and their prospective clients – when you require our packaging service to submit and application to a mortgage provider.
5.	To contact broker if required or to respond to any communications that you might send to us.
8.	Arranging premium finance agreements: Subject to a provider credit review, we will furnish the broker with the loan details including approval/decline/loan offer supplied from the provider.
11	To notify you about changes to our service- we will update broker on any Terms and conditions changes.

If you require further information on any of the above basis for processing your data, we can provide you with further details.

In any event, Brokers Ireland Network Services Limited 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.

Special Categories of personal data

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for mortgage

application submission purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

The lender specific documents collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin) we will ensure that specific measures are being taken to safeguard the fundamental rights and freedoms of data subjects.

The processing of data concerning health is lawful where it is necessary and proportionate for the purposes of:

- (a) a policy of insurance or life assurance,
- (b) a policy of health insurance or health-related insurance,
- (c) an occupational pension, a retirement annuity contract or any other pension arrangement, or
- (d) the mortgaging of property

How we share your data

We may make your information supplied to us from your representative/broker available to third parties with whom we have a relationship, where that third party is providing services. We will only provide those third parties (data processors) with information that is necessary for them to perform the services.

1.	Insurance/mortgage intermediary where we need to manage the services provided to you such as Product Providers and underwriters. You can refer to their privacy statements on their website for more information about their privacy practices.
2.	Public authorities, regulators and government bodies , where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity;
3.	Third-party processors: We outsource our processing operations to suppliers that process personal information on our behalf. CRM/BINS platform/MBL/MTE/LENDER PIIatforms. These processing operations remain under our control and/or we have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Brokers Ireland Network Services Limited 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 fulfill 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 Brokers Ireland Network Services Limited procedures.

The third parties that we pass your personal data to are:

- Lenders – who you will have consented to us passing on your data to.
- Association of Insurance & Financial Brokers trading as Brokers Ireland
- Mortgage Brain
- Ergo (Online Application System)

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. We can confirm at the time of issuing this privacy notice that no such transfers are in place.

Data Subjects Rights:

Brokers Ireland Network Services Limited 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** – 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 Brokers Ireland Mortgage Services 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 should there be a third party involved as we have indicated in the processing of your personal data.

Security

The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

Retention of your personal data

Brokers Ireland Network Services Limited shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary. Brokers Ireland Network Services Limited may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

The retention period for each category of personal data will be set out in our Retention Schedule (this is a template and should be amended to reflect your firm's procedures) along with the criteria used to determine this period, including any statutory obligations we have. Should you require further information we would be happy to provide. Only include this sentence if you are and you have the information completed. Personal data will be disposed of securely.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Brokers Ireland Network Services Limited or how your complaint has been handled, you have the right to lodge a complaint directly with the Supervisory Authority and Brokers Ireland Network Services Limited.

Failure to provide further information

If we are collecting your data for a mortgage contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect. When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

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.

Privacy policy statement changes

Brokers Ireland Network Services Limited 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 May 2023