



Dwyer Barry - Data Privacy Policy

This Privacy Policy of ENSJ Ltd., trading as Dwyer Barry (“Dwyer Barry” or the “Firm”), relates to information collected and held by the Firm from its clients. Dwyer Barry, is regulated by the Central Bank of Ireland as an Investment Intermediary under Section 10 of the Investment Intermediaries Act 1995 (as amended) and is registered as an Insurance Intermediary under the European Union (Insurance Distribution) Regulations 2018.

The purpose of this Privacy Policy is to outline how we deal with any personal data you provide to us, we collect from you or will be processed by us. The contents of this Privacy Policy are subject to change from time to time and will be issued to our clients when a new transaction is undertaken by that client.

Personal Data – what is it?

Personal data means data which relates to a living person who may be identified directly or indirectly from that data. The processing of Personal data is governed by the General Data Protection Regulation 2016/679 (“GDPR”).

What categories of Personal Data are processed?

- Personal data received from you from time to time as a personal client of Dwyer Barry. This personal data includes but is not limited to:
 - Name, date of birth, gender, nationality, address, contact details, telephone number, email address, employer name, employee number, date of joining service, dates of absence, employment category, job title, employee benefit details, underwriting status, date of leaving service, PPSN, salary and remuneration, details of current and historic pension arrangements, pension contributions, insurance cover/underwriting details, health information, marital status, beneficiary details, bank details, passport number, driving licence, utility bills, details of power of attorney.
- From time to time sensitive or “special categories” of personal data may be processed, for example, data relating to your physical or mental health e.g. in circumstances where you retire early on grounds of ill health or for the purpose of obtaining insurance cover or processing a disability claim. Special categories of Personal Data include information revealing a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

We may process your data for the following purposes:

- To provide personal financial services to you including but not limited to assessing your financial needs and providing you with professional financial advice and recommendations
- To provide administration services if joining a Group PRSA Scheme
- To communicate with a product provider such as an Insurance Company or fund manager
- To communicate with you by post, telephone, email or SMS, for the above purposes, (unless you instruct us not to do so in writing)
- To initiate a product application if requested by you.
- To comply with a legal or regulatory obligation

Information we automatically collect.

We sometimes automatically collect certain types of information when you visit our website and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your express consent. Further information about our use of cookies can be found in our Cookie Notice at the footer of our web page.

Legal basis for processing your Personal Data (acting as a data controller):

The above purposes are necessary and lawful for the performance of a contract with you and/or for the provision by Dwyer Barry of its services, including but not limited to, general consultancy services, investment consultancy services, insurance consultancy services.

Also, Dwyer Barry may process personal data to comply with the requirements of the Central Bank of Ireland's Code(s) of Conduct which include the Consumer Protection Code, the Fitness and Probity Standards and Minimum Competency Code and to comply with legal obligations such as reporting to and liaising with the Revenue Commissioners for tax purposes or when dealing with the Pensions Authority or the Financial Services and Pensions Ombudsman in the event of an enquiry or complaint.

We may also process your personal data for the purpose of our legitimate interests such as keeping you up to date with information about other products and services we offer, except where your consent is required by law in order to communicate with you; Where we collect sensitive personal data such as when you retire early on grounds of ill health or for the purpose of obtaining insurance cover or processing a disability claim shall be processed on one or more of the following grounds:

- With your explicit consent;
- Where necessary to protect your vital interests where you are physically or legally incapable of giving consent;

- Where necessary for the establishment, exercise or defence of a legal claim by us;
- Where necessary for the purpose of carrying out our obligations and exercising our rights in the field of employment and social security and social protection law.

Security of processing

Dwyer Barry implements appropriate technical and organisational measures to protect the Data from unlawful or unauthorised processing and accidental loss, destruction or damage having due regard for the nature of the Personal Data concerned, the level of access to it, the nature, scope, context and purposes of the processing provided that such measures ensure a level of security appropriate to the risks to the rights and freedoms of Data Subjects that might result from unauthorised or unlawful processing or accidental loss, destruction or damage to the Data.

Data Retention

As a Wealth Management personal client, your data will be processed for seven years after the date you leave the Dwyer Barry agency. The data is retained in accordance with the Dwyer Barry destruction and data protection policy.

Sharing of your Personal Data

Your personal data will be treated as strictly confidential but may be disclosed to the Pensions Authority, Revenue Commissioners, the Financial Services & Pensions Ombudsman, auditors, professional advisors, insurance companies and (potentially) other service providers in connection with the administration of the pension scheme of which you are a member.

Your PPS number is your Personal Public Service Number. It is a unique identifier for use in transactions with public bodies such as the Revenue Commissioners and the Pensions Authority and is used by Dwyer Barry for this purpose.

Your personal data is stored securely at all times. The vast majority of your personal data is stored securely and backed up within the EEA, however in some instances your data may be transferred to, processed and stored at, a destination outside the European Economic Area (“EEA”) subject to the provisions of GDPR being complied with by that processor.

Your Rights

You have the right to raise objections in relation to the processing of your personal data, which may include a right to restrict such processing in certain instances. You also have a right to request a copy of your personal data and, in limited circumstances, to request its rectification or erasure. Any such queries, objections or requests should be directed to the directors of Dwyer Barry and will be processed in accordance with applicable data protection legislation. If you are not satisfied with how your query or complaint has been resolved, you have the right to raise the matter with the Office of the Data Protection Commissioner at:

Data Protection Commission
21 Fitzwilliam Square South,
Dublin 2.
D02RD28
Web: www.dataprotection.ie
Email: info@dataprotection.ie

Contact Us

If you have any queries in relation to our Privacy Policy please contact the directors of Dwyer Barry, in writing, at Glandore, City Quarter, Lapps Quay, Cork.

We 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.

10th December 2024