

Personal Data Privacy Statement for Graphical Financial Analysis Limited

This data privacy statement applies to Graphical Financial Analysis, of Dingle Hub, Cooleen Business Park, Dingle, Co. Kerry, Ireland.

The purpose of this statement is to explain how Graphical Financial Analysis Limited (hereinafter referred to as “GFA” , “we” or “us”), collect, process, store and keep secure your personal data in connection with our business in accordance with the Data Protection Act 2018 and the GDPR Regulation (EU) 2016/679.

How We Collect Your Personal Data

Information supplied to us

Personal data is normally supplied either by you, the data subject, or by a third party partner (from our third party partners, such as your local credit union.). It is normally collected from visits to our website, by post, by phone, by fax, directly from data subjects or by email correspondence. We obtain personal information when you register for, or request certain services. By registering and/or submitting personal information to us, you are also agreeing to the use of this information in accordance with our Privacy Statement.

Information Automatically Collected By Us

Examples of the information we automatically collect and analyse include Internet protocol (IP) addresses (used to connect devices to the Internet), user login details, e-mail address, cookies, and details of products/services that visitors viewed or searched for on our website.

Information We Collect

Non Personal Data

We may gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This Non-Personal Data comprises information that cannot be used to identify or contact data subjects, such as demographic information regarding, for example, user IP addresses (where they have been clipped or anonymised), browser types and other anonymous statistical data involving the use of our website (<https://www.graphicalfinancialanalysis.com/>).

Personal Data

This is data that identifies individuals or can be used to identify or contact individuals and may include information such as a name, address, email address, birth date, marital status, occupation and salary range. While information such as name and email address is required by us to provide customers with our services, other personal data is only collected from data subjects if it is voluntarily submitted to us.

Data Type	How it is collected
Contact Data	Various forms and enquiry sections allow you to provide us with contact data for the purpose of contacting you with a quote, offer or other legitimate business related activity. This includes home address, email address and telephone numbers.
Identity Data	When you complete a form or other entry on the website it may include identity data. This could include first name, last name, title, date of birth and gender.
Marketing and Communications Data	This includes your preferences in receiving marketing from us and our third parties and your communication preferences, occupation, vehicle details and transaction history

Usage Data	Analytical data is gathered for digital marketing purposes and can include information about how you use our website.
Technical Data	Cookie information is gathered upon visiting our website. This includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
Financial Information	Detailed financial information including all facets of information required for loan applications.
Interactions Data	Information about your interactions with us, including correspondence and phone calls between us and you.

Special Category data

We do not collect special category data

How We Process Your Personal Data

Non-Personal Data

We use Non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us better design and organise our website.

Personal Data

Personal information which you supply to us may be used for the following purposes:

Purpose of Processing	Lawful Basis for processing
Manage and respond to any requests you have made to us.	processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
To help us identify you when you contact us.	processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
To provide you with the most user-friendly online navigation experience.	processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
For general administration, reporting, audit and analysis purposes and to manage our relationship with you.	It is necessary in our legitimate interests and to ensure the effective management of our business.
For market research purposes and customer satisfaction surveys. This helps us improve the quality of our products and services we provide.	The data subject has given consent to the processing of his or her personal data for one or more specific purposes
To market to you and, where appropriate, to invite you to any events that we might organise.	the data subject has given consent to the processing of his or her personal data for one or more specific purposes
To comply with legal obligations. If required by any law enforcement agency, court, regulator, government authority or other third party.	processing is necessary for compliance with a legal obligation to which the controller is subject
Pass on to any third party that purchases, or to which we transfer, all or substantially all of our assets or business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Policy.	processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party
To carry out analysis. We may combine and analyse your personal information to help us develop and improve our	The data subject has given consent to the processing of his or her personal data for one or more specific purposes

products and services, understand our customers better; and to manage and improve our relationship with you.	
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How We Protect Your Personal Data

Data Storage

Personal Data is stored securely in electronic form on our IT systems and /or in hard copy form in our offices. We have invested in both technical and organisational security measures and training of employees to safeguard all personal data.

Retention Period:

The length of time we will retain your personal data will depend on the purpose for which we are processing it. The following criteria will be applied:

- We will retain personal data for the minimum period required for the purpose(s) of processing.
- Personal data will be retained for a period of time subject to our data retention policy and/ or legal requirements
- When personal data is no longer required to be retained, it will be anonymized, to remove all personal identifiable information, or deleted in a secure manner in accordance with our technical and organisational procedures.
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Security

The security of your personal data is important to us. We restrict access to personal information to our employees, contractors and processors who have a requirement to process your personal information.

Your personal information is only processed on our instructions, under a duty of strict confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable data protection regulator of a breach where we are legally required to do so.

We employ a range of managerial and training measures to ensure that all relevant staff are suitably trained and are aware of our data protection obligations when processing personal data.

Transmission of personal data over the Internet (for example web-forms or email) is insecure. Therefore, we cannot guarantee the safety and security of personal data transmitted in this way.

Sharing Your Personal Data

We will only use your Personal Data where we have a lawful purpose to do so. We will never sell Personal Data to a third party. We will only pass Personal Data to a third party where there is an explicit business need to do so.

We will not share your information with any third parties unless one of the following conditions applies:

- As required by law, any applicable regulation to protect the rights, property, or safety of ourselves or others.
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.
- If GFA is involved in a merger, acquisition, or sale of all or a portion of its assets, to any prospective seller or buyer of all (or part of) our business or assets. You will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information;
- Where you have given your consent to pass your personal data to a third-party marketing companies who might contact you on our behalf with information about products and services which may be of interest to you

Third Parties We Share Your Personal Data With

Third Party	Reason
Revenue Commissioners	We may sometimes share your information where we complete the first registration of your motor vehicle or where we apply for exemptions from VRT, VAT and/or motor tax for you
Third Party Service Providers	We may share your personal information with third party service providers that perform services and functions at our direction and on our behalf such as our accountants, IT service providers, printers, lawyers and other business advisors, and providers of security and administration services
Potential Sale of the Company	We may transfer your personal information to companies we plan to merge with or be acquired by.
An Gardaí, Government Bodies (or officials)	We may share your personal information with an Gardaí or other government bodies or agencies where we are required to do so by law.

Marketing

If you have consented to marketing from us, we may contact you with information about our products and services through email. All such communications will come from us, or from our selected marketing partners. You have the right at any time to stop us from contacting you for marketing purposes or giving your information to third party marketing companies. You will also be given the opportunity on every email communication that we or our trusted partners send you to indicate that you no longer wish to receive our or their direct marketing material.

Cookies

When you visit our website, we (or our service providers) may use cookies (small text files stored in a user's browser) which may collect personal data. Additional information on how we use cookies and other tracking technologies and how you can control these can be found in our **Cookies Policy** on our Website. We collect personal usage data from websites to perform analytical tasks that allow us to better manage marketing processes and expenditure

Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- e) <https://support.apple.com/kb/PH21411> (Safari); and
- f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you may not be able to use all the features on our website and service.

Links to other Websites

Our websites may provide links to third-party websites plug-ins and applications such as supplier brand websites, for your convenience and information. GFA is not responsible for the privacy practices or the content of such websites or for the privacy policies and practices of other third parties. If you decide to click on a third party link thus enabling a connection, those connections may allow third parties to collect or share data about you. We encourage you to read the individual privacy and cookie policy of every website that you visit.

Social Networking Site Links

Our website may contain links to external social network sites such as Facebook, LinkedIn, YouTube and Twitter. These external social networks are exclusively operated by their respective owners. All Links to Social networking sites are made clearly visible on our website through the use of representative logos. If you decide to follow these links, you will be directed to a third party website which is not under our control. Cookies and plug-ins may be activated and your browser will establish a link with relative social network site directly.

If you follow social network links on our website whilst you are signed into these social network sites, personal information such as user account details and information concerning your visit to our website may be passed to these third party websites. This information may be transferred to and stored to a third party entity.

Your personal information will not be transferred to these third party social networking sites by visiting our website, but may result in personal data being transferred to a social network entity if you decide to click the relevant link.

For further information on third party privacy and cookie policies, please refer to the relevant third party social network's privacy and cookie policies on their websites.

Social Network Links We Use on Our Website

Vendor Name	Personal Data that may be Collected
None at present	None at present

International Transfers

Information we collect will not be processed in or transferred to any country or territory outside of the European Economic Area. If we undertake international transfers in the future, you will be contacted before any such transfer takes place with the following information:

- transfer to the third country
- Details regarding the safeguards that are in place to protect your personal information.

Updating Your Personal Data

In order to help us ensure the personal data we hold about you is accurate and current, and to help us to provide you with our services, we encourage you to keep us informed if your personal data or circumstances change. To update your personal data please contact us at the details set out below in the **contact information** section.

Contact Information

If you have any questions or comments about this privacy statement, or if you wish to request information, you can contact us at:

gdpr@graphicalfinancialanalysis.com

Changes to this Statement

We may update our Privacy Statement from time to time, by communicating such changes to you and publishing the updated Privacy Notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your personal information.