

## Privacy Notice/Statement – Brunsfeld

### Introduction

Brunsfeld is a development finance specialist providing an alternative source of capital for site purchase, new building and refinancing of existing developments with a strong focus on residential development finance. Brunsfeld can provide funding for up to 90% of the total cost of development finance on residential schemes. As part of our business offering the collection of personal data is not required for the most part however from time to time personal data may be collected in order to offer finance terms. To this end Brunsfeld in the collection of such personal data is obliged to adhere to the principles of the General Data Protection Regulations (hereafter GDPR) as it comes into effect from May 25<sup>th</sup> 2018.

It is the intention of this privacy statement to explain to you the information practices of Brunsfeld in relation to the information we collect about you which is deemed personal data under GDPR.

For the purposes of the GDPR the data controller is:

- Brunsfeld Limited
- Located at 62A Terenure Road North, Terenure, Dublin 6W DW6 CF54
- When we refer to 'we' it is Brunsfeld

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?**

Brunsfeld is a firm offering specialist finance predominantly to firms and professionals that fall outside of the terms of the GDPR however from time to time we may have to process, collect and store personal data of natural persons and as such this document constitutes our privacy notice under GDPR.

Our GDPR representative can be contacted directly here:

- Elaine Maher
- 01 231 9334

### **Purpose for processing your data**

Personal data will only be collected for the purpose of providing finance for a scheme or development project.

### **Why we are processing your data? Our legal basis.**

Our legal basis for processing data which is deemed personal data under GDPR is on the basis of providing a finance solution which will be governed by a contract and also on the basis of consent.

### **How will Brunsfeld use the personal data it collects about me?**

Brunsfeld will only process data that is necessary for the contract of finance being applied for.

## Who are we sharing your data with?

Brunsfeld

We may pass your personal data on to third-party service providers contracted to Brunsfeld 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 Brunsfeld procedures. In certain cases where you the client appoint a third party to act on your behalf we will share data with them on your written request to do so.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

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.

### Data Subjects Rights:

Brunsfeld facilitates you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request. For any GDPR related queries please contact our appointed representative Elaine Maher.

## 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 Brunsfeld 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 on should there be a third party involved as we have indicated in the processing of your personal data.

**Retention of your personal data**

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Brunsfeld will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body and our internal governance.

**Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Brunsfeld or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Brunsfeld's GDPR appointed Representative Elaine Maher

**Failure to provide further information**

If we are collecting your data for a contract and you cannot provide this data the consequences of this could mean the contract cannot be completed.

**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 and request your consent.

**Contact Us and Updates to this Notice**

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 01 231 9334 Elaine Maher.

This notice will be reviewed annually to ensure compliance with the GDPR and in line with all our policies and procedures.