

# Data Privacy Summary

How we protect and manage  
your personal data



**Bank of  
Ireland**

# Bank of Ireland Data Privacy Summary

At Bank of Ireland Group, we take your privacy seriously. It is important that you know exactly what we do with personal information that you and others provide to us, why we gather it and what it means to you. This document is being provided to you in line with our obligations under the General Data Protection Regulation (GDPR). The GDPR, together with associated data protection law places enhanced accountability and transparency obligations on organisations when using your information. The GDPR gives you greater control over your personal information, including a right to object to processing of your personal information where that processing is carried out for our business purposes. Please take time to read this notice carefully. If you are under 16 years of age you should take a look at our Youth Data Privacy Summary available at [bankofireland.com/privacy](https://bankofireland.com/privacy). If you have any questions about how we use your information, please contact our Data Protection Officer at the details below.

**This summary explains the most important aspects of how we use your information and what rights you have in relation to your personal information. You can get more detailed information by viewing our full Data Privacy Notice at [bankofireland.com/privacy](https://bankofireland.com/privacy), in-branch, by mail to Bank of Ireland, PO Box 12940, Dublin 18 or by contacting 01 688 3674.**

## 1. Who we are

Throughout this document, “we”, “us”, “our” and “ours’ refer to Bank of Ireland and Bank of Ireland Group. Your information is held by The Governor and Company of the Bank of Ireland and members of the Bank of Ireland Group. You can find more information about us at [investorrelations.bankofireland.com](https://investorrelations.bankofireland.com).

Your product or service terms and conditions will specify which of our businesses is providing the relevant product or service to you. Some of our businesses have their own Privacy Notices, including New Ireland Assurance Company plc, the Davy Group and Bank of Ireland UK plc. If you are a customer of one of these businesses, you should read their Data Privacy Notice. If you were introduced to us by an intermediary or broker or if you use third party payment providers you should also read their Data Privacy Notice.

## 2. The information we collect about you

We will hold:

- ▶ data to identify you, including your contact information;
- ▶ your financial details/financial circumstances;
- ▶ your marital status and/or your financial associations;

- ▶ information you provide us about others or others provide us about you (e.g. joint account applications);
- ▶ information which you have consented to us using (such as biometric information);
- ▶ sensitive or special categories of data;
- ▶ information from online activities (e.g. cookies and information about your internet browser settings and Internet Protocol (IP) address); and
- ▶ other personal information such as: telephone recordings, CCTV images at our branches and ATMs and information provided when exercising your data rights.

Sometimes we may use your information even though you are not our customer. For example, you may be a beneficiary, guarantor, director, cardholder or representative of a customer of ours or be a potential customer applying for one of our products or services.

### 3. When we collect your information

We collect information: (i) you give us; (ii) information from your use of our products, services or our websites and mobile apps, and; (iii) information provided to us by third parties.

### 4. How we use your information, the categories of information used and the legal basis

<b>Legal basis:</b> <i>We use, and share, your data where:</i>	<b>Categories of data typically processed based on this legal basis (see section 2 above and also section 2 of the Bank's Data Privacy Notice for more information on each category)</b>
you have agreed or explicitly consented to the using of your data in a specific way (you may withdraw your consent at any time);	<ul style="list-style-type: none"> <li>▶ Identity and contact information</li> <li>▶ Financial details/circumstances, such as your bank account details and payment reference information</li> <li>▶ Marital status and/or financial associations</li> <li>▶ Sensitive or special categories of data, such as biometric data to identify you</li> <li>▶ Information from online activities</li> <li>▶ Other personal information</li> <li>▶ All categories (where you have made the information public).</li> </ul>
use is necessary in relation to a service or a contract that you have entered into (e.g. to provide you with banking and payment services when you open or use a joint account or product) or because you have asked for something to be done so you can enter into a contract with us (e.g. you have asked us to provide you with a loan offer or quote when you apply to us for insurance);	Depending on the nature of the product/ service, this could involve all categories.

use is necessary because we have to comply with a legal obligation (e.g. complying with our “know your client” obligations and reporting to the Central Credit Register, regulatory authorities and law enforcement);	Depending on the nature of the product/service, this could involve all categories.
use is necessary to protect your “vital interests” in exceptional circumstances;	All categories.
use is authorised by regulation or law to perform a task carried out in the public interest;	Depending on the nature of the product/service, this could involve all categories.
use is for our legitimate interests (which you may object to) such as managing our business including credit risk management, providing service information, conducting marketing activities, system testing, fraud prevention, training and quality assurance, portfolio management and strategic planning and the purchase or sale of assets.	All categories.

## 5. How we use automated processing or “analytics”

We may analyse your information using automated means to:

- ▶ help us understand your needs and develop our relationship with you;
- ▶ help us to offer you products and service information we believe will be of interest to you;
- ▶ make assessments where you apply for a financial product (e.g. a loan) including creditworthiness and affordability. We may make lending decisions based solely on an automated analysis of your information. The types and sources of the information we process by automated means about you are listed above in Sections 2 and 3.

We also use automated processing to assist in compliance with our legal obligations in connection with prevention of fraud, money laundering and terrorist financing, for example, to screen for suspicious transactions. Where we make solely automated decisions that affect you in a legal or a significant way, you have the right to provide your point of view and have those decisions reviewed by a member of our team.

## 6. How we use your information for marketing

We’d like to be able to share news about services, products and offers from Bank of Ireland Group as well as from specially selected trusted partners but only if we have your permission to do so or a legitimate interest. We will send you information if we believe it can make your life easier or offer you value for money based on the information we hold about you. You can choose the way we contact you from email,

phone, post, SMS and digital messaging. You can change your mind at any time online (visit [bankofireland.com/privacy/marketing-preferences](https://bankofireland.com/privacy/marketing-preferences)) or by calling us on **01 688 3674**.

## 7. Who we share your information with

When providing our services to you, we may share your information with:

- ▶ your authorised representatives;
- ▶ third parties with whom:
  - (i) we need to share your information to facilitate transactions you have requested, and
  - (ii) you ask us to share your information;
- ▶ Bank of Ireland Group companies;
- ▶ service providers who provide us with support services;
- ▶ statutory and regulatory bodies (including central and local government) and law enforcement authorities;
- ▶ as part of a credit application and ongoing loan management we will carry out credit checks and share information with the Central Credit Register and may also do so with other credit reference/rating agencies. They will keep a record of this information and may give it to other financial institutions that you apply to for credit facilities;
- ▶ third parties in connection with a sale or purchase of assets by us, debt collection agencies, budgeting and advice agencies, tracing agencies, receivers, liquidators, examiners, Official Assignee for Bankruptcy and equivalent in other jurisdictions;
- ▶ trade associations and professional bodies, non-statutory bodies and members of trade associations;
- ▶ pension fund administrators, trustees of collective investment undertakings and pensions trustees insurers/re-insurers, insurance bureaus;
- ▶ where you instruct a Third Party Provider (TPP) to have access to an account you hold with us. Where you choose to instruct a TPP in respect of a joint Account, you should be mindful of the fact that personal information of your joint Account Holder may also be sent to the TPP. Similarly, your joint Account Holder may also choose to instruct a TPP resulting in your personal information being shared with the TPP without further reference to you; and
- ▶ business or joint venture partners.

## **8. How long we hold your data**

How long we hold your data for is subject to legislation and regulatory rules we must follow, set by authorities such as the Central Bank of Ireland and the type of financial product provided to you. In most cases this period is 7 years after a transaction, (but may be up to 13 years where we had a deed in place) or 6 years after you cease to be a customer.

## **9. Implications of not providing your personal data**

If you do not provide your personal data we may not be able to:

- ▶ provide requested products or services to you;
- ▶ continue to provide and/or renew existing products or services;
- ▶ assess suitability; and
- ▶ where relevant, give you a recommendation for a financial product or service provided by us.

We will tell you when we ask for information which is not a contractual requirement or is not needed to comply with our legal obligations.

## **10. Using companies to process your information outside the European Economic Area (EEA)**

In some cases, we may transfer information about you and your products and services with us to our service providers and other organisations outside the EEA. We will always take steps to ensure that any transfer of information outside of the EEA is carefully managed to protect your privacy rights. Full details of transfers are available in our Data Privacy Notice which you can get online, in branch or by telephone.

## **11. How to exercise your information rights including the right to object**

You have the following rights in relation to how we use your information, including the right, without undue delay, to:

- ▶ find out if we use your information, access your information and receive copies of your information;
- ▶ have inaccurate/incomplete information corrected and updated;
- ▶ object to particular use of your personal data for our legitimate business interests or direct marketing purposes;
- ▶ in certain circumstances, to have your information deleted or our use of your data restricted;
- ▶ in certain circumstances, a right not to be subject to solely automated decisions

and where we make such automated decisions, a right to have a person review the decision;

- ▶ exercise the right to data portability (i.e. obtain a transferable copy of your information we hold to transfer to another provider); and
- ▶ to withdraw consent at any time where processing is based on consent (for example if you have given consent to marketing).

If you wish to exercise any of your data rights, you can contact us at **bankofireland.com/privacy**, in-branch, by mail to **Bank of Ireland, PO Box 12940, Dublin 18** or by contacting **01 688 3674**.

If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests) we may extend this period by a further two calendar months and shall explain the reason why. If you make your request electronically, we will try to provide you with the relevant information electronically. You also have the right to complain to the Data Protection Commission or another supervisory authority. You can contact the Data Protection Commission by visiting their website **dataprotection.ie**, by email at **info@dataprotection.ie** or by post at **21 Fitzwilliam Square South, Dublin 2, D02 RD28**.

## **12. How to contact us and/or our Data Protection Officer**

If you have questions about how we use your information, you can reach our Data Protection Officer at **bankofireland.com/privacy**, by mail to **Bank of Ireland, PO Box 12940, Dublin 18** or by contacting **01 688 3674**.

## **13. Updates**

We will update our Data Privacy Notice from time to time. Any updates will be made available on our website at **bankofireland.com/privacy** and, where appropriate, notified to you by SMS, e-mail 365 online our mobile banking app or other communication channel we deem appropriate.

[bankofireland.com](https://bankofireland.com)

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Bank of Ireland is regulated by the Central Bank of Ireland. Bank of Ireland Mortgage Bank u.c. trading as Bank of Ireland Mortgages is regulated by the Central Bank of Ireland. Bank of Ireland trading as The Mortgage Store – powered by Bank of Ireland is regulated by the Central Bank of Ireland. Bank of Ireland Insurance Services Limited trading as Bank of Ireland Insurance and Bank of Ireland Insurance Services is regulated by the Central Bank of Ireland.