
viepal Financial Services Limited

Privacy Statement

Date of issue: 1st March 2020

Your Right to Privacy

In this policy statement we explain how we respect your privacy in relation to the information you provide to us when you use this website and any viepal App.

When we talk about Apps we mean an viepal application which can either be downloaded from a software application to a mobile device and can be used to access viepal services.

When we talk about “viepal” or “us” or “we” in this statement we are talking about viepal Financial Services Limited, and its subsidiaries, affiliates and their respective parent and subsidiary companies (“viepal”).

viepal is the registered business name of viepal Financial Services Limited, registered in Ireland, company number 662280, with a registered address of 88 Harcourt Street, Dublin 2, Ireland.

Information we collect and Use

When you visit our website and/or our Apps we collect information relating to your interactions through these online channels.

In some cases, the information we collect will be anonymous and it will simply tell us what pages have received the most activity and are of particular interest to our customers in general.

Where you log onto and use our apps or website, we will be able to identify what pages you have shown a particular interest in, what pages you have visited multiple times and also what pages you have spent the most amount of time on. We will mostly do this work ourselves however sometimes we will use Google Analytics to assist us. In all cases we will carry this work out in a responsible manner.

We will always let you know how we intend to use your information before collecting it, so that you can decide if you wish to provide that information.

We may collect and process information about you such as:

- Information you give us when applying for a product or service
- Information (e.g. phone location) from your mobile device
- What pages you have viewed
- Certain interactions you have had on those pages
- The number of times you may have visited a specific page
- The amount of time you may have spent on certain pages

This information enables us to provide you with a more efficient and effective customer service by developing a wider understanding and appreciation of our customer base.

Where we have identified you specifically, we can offer you a more bespoke user experience and assist you with any customer service issues you may have experienced or may be experiencing.

To use your information lawfully, we rely on one or more of the following legal bases:

- performance of a contract
- legal obligation
- protecting the vital interests of you or others
- public interest
- our legitimate interests
- your consent

To meet our regulatory and legal obligations, we collect some of your personal information, verify it, keep it up to date through regular checks, and delete it once we no longer have to keep it.

We may also gather information about you from third parties to help us meet our obligations. If you do not provide the information we need, or help us keep it up to date, we may not be able to provide you with our products and services.

Sometimes we need your consent to use your personal information. With direct marketing for example, we need your consent to make you aware of products and services which may be of interest to you. We may do this by phone, post, email, text or through other digital media.

When we use sensitive personal information about you, such as medical or biometric data, we ask for your consent. Before you give your consent, we tell you what information we collect and what we use it for. You can remove your consent at any time by contacting us.

Interactive Areas

Our website and Apps may offer chat options which allow you to speak directly with a viepal staff member while you are browsing online. These chat options may appear automatically on your screen, they are an optional service and you can decide if you wish to interact with them.

This chat service is governed by the terms and conditions of use for viepal.com which are available on our website and which you should read before using a chat option.

It is important that when you interact with these chat options and other Interactive Areas (discussion forums, bulletin boards, blogs) you do so in a responsible way.

Under no circumstances should you provide any bank account details, transactional history, personal or financial information when using these services.

You may however choose to provide us with certain information, such as your name and contact details, if you would like us to contact you directly. If you do, we will use this information solely to respond to and deal with your comments or queries.

Sharing Data

We may share your information with third parties.

For example, to:

- provide products, services and information
- analyse information
- research your experiences dealing with us
- sell whole or part of our business
- prevent financial crime
- help trace, investigate and recover funds on your behalf
- trace information
- protection both our interests
- meet any applicable law, regulation or lawful request

Where the third party is a data controller, they have the same obligations under Data Protection law to protect your data, as we do.

Where the third party is a data processor, we require that these third parties provide a sufficient guarantee that the necessary safeguards and controls have been implemented to ensure there is no impact on your data rights and freedoms.

We also have to share information with third parties to meet any applicable law, regulation or lawful request.

When we believe we have been given false or misleading information, or we suspect criminal activity we must record this and tell law enforcement agencies, which may be either in or outside Ireland.

International Transfer of Data

We may transfer your personal information outside of the European Economic Area (EEA) to help us provide your products and services.

We expect the same standard of data protection is applied outside of the EEA to these transfers and the use of the information, to ensure your rights are protected.

How We Keep Your Information Safe

We know that you care about how your information is used, stored and shared. We appreciate your trust in us to do that.

To protect your information, we use security measures that comply with Irish Law and meet international standards. This includes computer safeguards and secure files and buildings.

When you contact us to ask about your information, we may ask you to identify yourself. This is to help protect your information.

How Long We Keep Your Information

We do not hold your information for longer than necessary to meet our legal and regulatory obligations.

We will hold your information while you are a customer and for a period of time after that. We do not hold it for longer than necessary.

Your rights

You have a number of rights in relation to your information which you have shared with us.

- *Access to your personal information:* You can ask us for a copy of the personal information we hold. You can ask us about how we collect, share and use your personal information.
- *Updating and correcting your personal details.*
- *Removing consent:* You can change your mind wherever you give us your consent, such as for direct marketing, or using your sensitive information, such as medical or biometric data.
- *Restricting and objecting:* You may have the right to restrict or object to us using your personal information or using automated decision making.
- *Deleting your information (your right to be forgotten).* You may ask us to delete your personal information.
- *Moving your information (your right to Portability).* Where possible we can share a digital copy of your information directly with you or another organisation.

If you wish to exercise any of your data rights, contact us at privacy@viepal.com to action your data protection rights.

Data Protection Office

Our Data Protection Officer oversees how we collect, use, share and protect your information to ensure your rights are fulfilled. You can contact our Data Protection Officer at privacy@viepal.com or by writing to them at: Data Protection Officer, viepal, 88 Harcourt St, Dublin 2, Ireland.

Making a Complaint

If you have a complaint about the use of your personal information, please contact us as soon as possible, giving us the opportunity to put things right as quickly as possible.

If you wish to make a complaint you may do so in person, by telephone, in writing and by email.

Please be assured that all complaints received will be fully investigated. You can register a complaint through our contact centre, our Website, by phone, or by email.

We ask that you supply as much information as possible to help our staff resolve your complaint quickly.

You can also contact the Office of the Data Protection Commission using the below details:

- Visit their website www.dataprotection.ie.

Cookies

The use of cookies allows us to improve our service to you and an option to manage your cookie preferences is available in our Cookie Notice.

Disclaimer

This Site and our Apps may contain hypertext links to associated web sites maintained by viepal and you are warned that when you enter such sites, you will be subject to the terms and conditions of those sites.

There may also be links to web sites **not** maintained by viepal and you are warned that when you enter other websites via such hypertext links, you will not be subject to the terms and conditions of www.viepal.com and you will not benefit from the protections afforded to you in using our Site.

viepal will not be liable in any way for the content, availability or use of such third party websites and you use such links entirely at your own risk.

Additional Information

viepal partners with third parties who provide services to us. You can navigate to these parties' websites from our website. Our partners may use cookies, and you can find out more on their website.

Amendments

viepal reserves the right in its sole discretion to amend this privacy statement at any time, you should regularly check this privacy statement for any amendments.

Terms and Conditions

This Privacy Statement is subject to the Terms and Conditions of Use of the viepal Financial Services Limited website, a copy of these is available on www.viepal.com.

It is important that you read the terms and conditions of use as where there is a conflict between this Privacy Statement and the Terms and Conditions of Use, the Terms and Conditions of Use shall prevail.

In certain circumstances we may be obliged to disclose personal information relating to you to third parties in order to prevent, detect or prevent fraud.

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