

Privacy Notice

Introduction

Starpoint Mortgages Ltd T/A Now Mortgages is committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights.

It is the intention of this privacy statement to explain to you the information practices of Starpoint Mortgages Ltd in relation to the information that we collect about you.

For the purposes of the GDPR the data controller is:

- Eoin Culhane - Director
- Contact details of Eoin Culhane - eoin@nowmortgages.ie
- When we refer to we/us, we mean Starpoint Mortgages Ltd T/A Now Mortgages

Please read this Privacy Notice 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?

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Mortgages and Mortgage Protection. We provide our services from the selection of products provided by the Companies and Lenders we have agencies with. We recommend the product that, in our professional opinion, is best suited to you. In providing this service to you we will need to obtain personal information from you. The following outlines how we deal with this information and how it is used. Any questions or concerns you have can be addressed to us directly.

Our Data Protection Officer / GDPR Owner *and data protection representative* can be contacted directly here:

- Name: Eoin Culhane
- Email address: eoin@nowmortgages.ie
- Phone number: 021 4274136

How do we collect your information and what information do we collect?

The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data.

Our organisation collects personal data in the following ways, if you:

- request a service from us eg application for mortgage or mortgage protection;
- register with or use any of our websites or online applications;
- use our website/apps and it installs cookies or other tracking technologies onto your device.
- engage with us on social media;
- contact us with a complaint or query; and
- apply for a position with us.

What information do we collect?

The information we collect about you includes the following:

1.	Contact and Identifying information , e.g., name, address, contact details; email, mobile, landline
2.	Unique identifiers e.g. <ul style="list-style-type: none"> PPS number – the reason why we collect your PPS number is <i>for personal identification as part of product application process</i>. insurance policy numbers, the reason why we collect this is <i>to ensure that appropriate protection is in place (eg condition of mortgage approval)</i>.
3.	Demographic details , age, gender, marital status, lifestyle, and insurance requirements; date of birth, dependents, photo ID, as well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. E.g., your children/spouse
4.	Family and Beneficiary Data , e.g., dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant.
5.	Employment information e.g., role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history; <i>This information is necessary for our Fact Find with our clients.</i>
6.	Publicly available sources : e.g., Information about you in the public domain such as Director information from the Companies Registration Office.
7.	Health information such as information about your health status, medical records and medical assessment outcomes; We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol), medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information.
8.	Pensions and Insurance Benefits information such as current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, PAO.
9.	Financial details e.g., bank account details, details of your credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details

10.	Claims Data (From you and any relevant third parties).
11.	Marketing preferences: <i>we will only send you direct marketing if you explicitly consent.</i>
12.	Online information: e.g., information about your visits to our websites;
13.	Social media information (e.g., likes and posts) with our social media presence; this includes, LinkedIn, Twitter, Facebook, Instagram.
14.	Calculators on our website. We use this data to perform calculations to prepare quotations for life insurance or mortgages.

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

Information we automatically collect.

We sometimes automatically collect certain types of information when you visit our websites 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 expressed consent.

How do we use your personal data?

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for mortgages, insurance, protection, independent financial advice. For example,

- To give you information on and provide you with recommended financial products.
- Disclose data to the policyholder, the life assured, beneficiary, trustee, assignee, successors, group company or to other parties.
- To comply with legal and regulatory requirements including Anti-Money Laundering and Sanctions compliance.
- To understand how people interact with our websites (if applicable).
- To carry out and determine the effectiveness of advertising, and of marketing campaigns.
- Handling complaints.
- To notify you about changes to our service.

Why we are processing your data? Our Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data. Below are some examples:

Performance of a contract	When we enter a contract with you, we will collect and use your personal data to enable us to fulfil that service.
Legal obligation	The use of some of your personal data is necessary for us to meet our legal obligations e.g. Regulatory purposes to the Central Bank.
Consent	<p>Sometimes we may rely on consent as a legal basis for processing your information. For example, we rely on consent to collect and use personal data for any criminal convictions or alleged offences. This is used when we need to assess risk relating to an insurance policy for you or as a condition imposed by a lending institution. We share this information with other third parties where it is necessary to manage these services provided to you – these services include insurance underwriters, reinsurer, other insurance providers, lending institutions.</p> <p>We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time.</p> <p>Sometimes if you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.</p>
Legitimate interests	Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.

If you require further information on any of the above basis for processing your data, we can provide you with further details.

Who are we sharing your data with?

In order to provide our services and to comply with legal obligations imposed on us, we may share your information with:-

- Pension Trustees, & beneficiaries of Pensions & other Financial Products, Relatives & guardians, (in certain circumstances and within the law)
- Legal, financial, investment, medical, & other professional advisors in the process of submitting your application on the various.
- Businesses that refer your business to us.
- Any business which we are required by law to share the information with, ie compliance resource companies.
- Database provider all data encrypted
- Insurance and Assurance companies we have agencies with
- An Garda Síochána (Anti Money Laundering)

- Central Bank of Ireland. We are authorised by the Central Bank of Ireland and they have the right to inspect our files.
- The Financial Services Ombudsman. In the event of a complaint.
- Data Protection Commissioner
- Lenders

We may pass your personal data on to third-party service providers contracted to Starpoint Mortgages Ltd in the course of dealing with you. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil 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 Starpoint Mortgages Ltd procedures.

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 located outside of the EEA (referred to in the GDPR as ‘third country,’) we will ensure it is done lawfully, i.e. there is an appropriate “level of protection for the fundamental rights of the data subjects”. We will therefore ensure that either the EU Commission has granted an adequacy decision in respect of the third country, or appropriate specified safeguards have been put in place, (e.g., Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs)).

Retention

Starpoint Mortgages Ltd T/A Now Mortgages shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary for the purpose(s) for which they were obtained. The retention period for each category of personal data will be set out in our Retention Schedule along with the criteria used to determine this period, including any statutory obligations we have. Should you require further information we would be happy to provide. Personal data will be disposed of securely.

Data Subjects Rights:

Starpoint Mortgages Ltd T/A Now Mortgages will facilitate your rights in line with our data protection policy and the [Subject Access Request procedure](#). This is available on request.

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. (The erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).
- **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.**
- **Right to make a complaint:** if we refuse your request under rights of access, we will provide you with a reason as to why.

All 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.

Complaints

If you wish to make a complaint about how your personal data is being processed by Starpoint Mortgages Ltd T/A Now Mortgages or how your complaint has been handled, you have the right to lodge a complaint with our Data Protection Officer or GDPR Owner (as identified above).

You may also lodge a complaint with the Data Protection Commission (DPC) in Ireland, whose details are:

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

See website for updated contact details to reach the appropriate section within the DPC.

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 or details are incorrect. When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

Special Categories of personal data

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health data, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for insurance and pension purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

- a policy of insurance or life assurance,
- a policy of health insurance or health related insurance
- the mortgaging of a property

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 021 4274136 or info@nowmortgages.ie.

Privacy notice/ statement changes

When we update this Privacy Notice/Statement, we will post a revised version online. Changes will be effective from the point at which they are posted. We would encourage you to review our Privacy Notice so that you are aware of updates.

This privacy policy was last reviewed in December 2025.