

Privacy Policy

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan

Version 2
May 2026

Introduction

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan 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 as a client.

It is the intention of this privacy statement to explain to you the information practices of Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan in relation to the information we collect about you. For the purposes of the GDPR the data controller is:

- **Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan.**
- **Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan** can be contacted on 01 6873780 or by email at andrew@capitalplan.ie.
Registered office: 14 Mach House, North Street Business Park, Swords, Co Dublin, K67A037.
When we refer to 'we' it is Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan.

Who are we?

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan is a financial planning firm who advise customers on products such as life assurance, mortgage and pension planning. We collect your data to enable us assist with the provision of advice in these areas.

Our GDPR Owner / Data Protection Officer can be contacted directly here:

- Andrew Nolan
- andrew@capitalplan.ie
- 01 5672078

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;
- register with or use any of our websites or online applications; *please outline in further detail if your firm does*
- use our website/apps and it installs cookies or other tracking technologies onto your device.
- engage with us on social media; *please outline in further detail if your firm uses LinkedIn, Twitter, Facebook etc*
- contact us with a complaint or query;
- apply for a position with us; *and please outline in further detail if your firm does*
- *Please update here if there are any further methods your firms uses to collect personal data.*

What information do we collect?

The information we collect about you includes the following:

Below are some examples please update/remove for your specific organisation.

Please only include if your firm collects this information. You need to be specific to ensure you are not collecting unnecessary data.

Purpose for processing your data

We need to gather your data to provide advice to you. The data provided will be analysed by Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan and where you require a specific product; then we will be required to share some or all of this data with an insurance company or mortgage lender. We will inform you in advance before providing your data to any third party.

Why we are processing your data?

Our legal basis. In order for us to provide you with financial advice then Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan need to collect personal data in order to provide recommendations in the areas of life assurance, pensions and mortgage lending.

Our reason (lawful reason) for processing your data under the GDPR is:

- Legal basis – then Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan needs to process your data as this is necessary in relation to a contract of insurance or mortgage product to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract.

In any event, then Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

How will Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan use the personal data it collects about me?

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

Special Categories of personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data) we will ensure the below.

Subject to suitable and specific measures being taken to safeguard the fundamental rights and freedoms of data subjects, the processing of data concerning health shall be lawful where the processing is necessary and proportionate for the purposes of the following:

- (a) a policy of insurance or life assurance,
- (b) a policy of health insurance or health-related insurance,
- (c) an occupational pension, a retirement annuity contract or any other pension arrangement, or
- (d) the mortgaging of property

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to then Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan 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 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 GDPR 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. The third parties that we pass your personal data to are:

- Financial institutions/Lenders/Life Assurance companies with whom we hold a written appointment with as outlined on our Terms of Business;
- Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, An Garda Síochána, the courts, fraud prevention agencies and other bodies to enable us cooperate by law as we are required to do so;
- We use a number of IT platforms to assist us in delivering our services.
- We also have a number of service providers we use to store and manage our data.

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.

1.	Contact and Identifying information, e.g., name, address, date of birth, 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>give reasons here</i> • pension scheme reference number- the reason why we collect this is <i>give reasons here</i> • insurance policy numbers, the reason why we collect this is <i>give reasons here</i>
3.	Demographic details, age, gender, (<i>check if you do collect</i>) 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.	<i>Employment information e.g., role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history; 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. <i>Please update here if you collect any further personal data publicly.</i>
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. <i>please list if there is anything in addition you collect, please also list the policies that you may require this data for e.g., life cover, health insurance.</i>
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, <i>please list if there is anything in addition you collect</i>
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, <i>please list if there is anything in addition you collect or delete those that do not apply to your firm</i>
10.	Claims Data (From you and any relevant third parties).
11.	<i>Marketing preferences: we will only send you direct marketing if you explicitly consent. Please update your direct marketing practices here. If you rely on legitimate interest include a reference here. You <u>cannot</u> rely on legitimate interest if you are marketing by electronic means, e.g. by email, SMS text, or telephone, other than in very limited circumstances: by email to existing customers where certain criteria <u>must</u> apply. See Brokers Ireland Guidance on Direct Marketing Data Protection and E-Privacy for more information. If you do not direct market delete this section.</i>
12.	Online information: e.g., information about your visits to our websites; <i>Please refer to your Cookie policy on our website</i>
13.	Social media information (e.g., likes and posts) with our social media presence; this includes, LinkedIn, Facebook, instagram
14.	Criminal records information e.g., the existence of or alleged criminal offences, which may appear following our AML/PEP due diligence.
15.	Searches that we undertake in relation to sanctions, money laundering and credit checks. We use our online applications CRM for <i>PEP/AML/Sanctions searches.</i>

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. Further information about our use of cookies can be found in our [Cookie Notice](#) at the footer of our web page. www.mortgageplan.ie

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 insurance, investment, protection, pension products, financial advice, quotes.

1.	Performing services for our clients and prospective clients – when you require insurance/investment products, we use your data to enable us to provide the required product
2.	Statutory and other regulatory requirements – we are required to carry out various obligations which include: <ul style="list-style-type: none"> • AML/Sanction checking • Knowing your customer “Fact Find” • Adherence to the Consumer Protection Code
3.	Communicate and marketing to you – <i>We communicate with clients using email, text message, phone calls written letters and via our website and social media channels. and market.</i>
4.	Process claims – <i>we submit any claim form to the relevant product provider on your behalf if requested by you.</i>
5.	To contact you if required or to respond to any communications that you might send to us.
6.	To administer our site including data analysis, testing, research, statistical and survey purposes. <i>Delete if not relevant.</i>
7.	Carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.
9.	Provide our professional services to you
10	Handling complaints . <i>Please see our complaints procedure on our website www.mortgageplan.ie</i>
11	To notify you about changes to our service

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.

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., pension contributions for Revenue Certificates, 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. 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 and other insurance providers.</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.

How we share your data

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements. *Each Broker to update these measures.*

1.	Insurance Partners where we need to manage the services provided to you such as Product Providers and insurance underwriters
2.	Public authorities, regulators and government bodies , where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity; <i>Please include links to forms used here.</i>

<p>3.</p>	<p>Third-party processors: We outsource our processing operations to suppliers that process personal information on our behalf. Examples include IT service providers who manage our IT and back-office systems and telecommunications networks, and accounting and payroll providers, CRM providers.</p> <p>OA Life & Mortgages CRM MTC Solutions our IT partner</p> <p>These processing operations remain under our control and we have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.</p>
<p>4.</p>	<p>BMCA Ltd trading as Beresford Mc Ardle our external auditors where necessary for the conduct of company audits.</p> <p>Hennessy Perrozzi Solicitors or to investigate a complaint or security threat.</p>

Security

The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

Retention

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

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.

Data Subjects Rights

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan facilitate you, our clients, 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.
- 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 Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan 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.

Additional information we are providing you with to ensure we are transparent and fair with our processing

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank of Ireland) and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan's data protection representatives (Data Protection Officer / GDPR Owner).

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.

Profiling – automatic decision making

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan uses automatic decision making in the provision of pension and mortgage related products as follows –

- a) Risk Profiling. To establish a customer's attitude to investment risk (relates to pensions and investments) where we use a series of automated calculators which calculate a customer's attitude to various levels of risk having answered a series of questions.
- b) Establishing affordability and providing quotations for financial services products.

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.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (01 5672078) or email andrew@capitalplan.ie.

Privacy policy statement changes

Thrust Financial Services Ltd trading as Capital Plan, Mortgage Plan may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services you agree to this privacy policy. This privacy policy was last reviewed on 23rd May 2026.

