Privacy Policy

Thrust Financial Services Ltd trading as Mortgage Plan, Capital Plan

Version 4 | August 2026

Introduction

Thrust Financial Services Ltd trading as Mortgage Plan, Capital 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 Mortgage Plan, Capital 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 Mortgage Plan, Capital Plan**

Thrust Financial Services Ltd trading as Mortgage Plan, Capital Plan can be contacted on 01 5672078 or by email at andrew@mortgageplan.ie.

Registered office: 14 Mach House, North Street Business Park, Swords, Co Dublin, K67 A037.

When we refer to 'we' it is Thrust Financial Services Ltd trading as Mortgage Plan, Capital Plan.

Who are we?

Thrust Financial Services Ltd trading as Mortgage Plan, Capital 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 can be contacted directly here:

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

How do we collect your information?

The personal information we collect varies depending upon the nature of our services. 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;
- use our website or apps and it installs cookies or other tracking technologies onto your device;
- engage with us on social media, for example LinkedIn, Facebook or Instagram;
- contact us with a complaint or query;
- 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, date of birth, contact details: email, mobile, landline.
2.	Unique identifiers, e.g. • PPS number — we collect your PPS number to provide it to life assurance companies and mortgage lenders who require it to set up policies and products for you. • Pension scheme reference number — we collect this to provide it to life companies and product providers who record this information for Revenue and the Pensions Authority. • Insurance policy numbers — we collect this to link your existing policies and obtain updated information so as to advise you correctly.
3.	Demographic details: age, gender, marital status, lifestyle and insurance requirements; date of birth, dependants, 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, such as your children or spouse.
4.	Family and beneficiary data, e.g. dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney, and details of your solicitor, tax adviser or accountant.
5.	Employment information, e.g. role, employment status (such as full time, part time or contract), salary information, employment benefits and employment history. This information is necessary for our Fact Find with our clients.
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) and medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information. We require this data for certain life policies, e.g. life cover and health insurance.
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 and Pension Adjustment Orders.
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, and PRSI contribution details required by mortgage lenders.
10.	Claims data, from you and any relevant third parties.
11.	Online information, e.g. information about your visits to our websites. Please refer to our Cookie Policy on www.mortgageplan.ie.
12.	Social media information (e.g. likes and posts) arising from our social media presence, including LinkedIn, Facebook and Instagram.
13.	Criminal records information, e.g. the existence of or alleged criminal offences, which may appear following our AML and PEP due diligence.
14.	Searches that we undertake in relation to sanctions, money laundering and credit checks. We use our online applications and CRM for PEP, AML and sanctions searches.

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and that 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 express consent. Further information about our use of cookies can be found in our Cookie Notice at the footer of our web pages: www.mortgageplan.ie and www.capitalplan.ie.

Purpose for processing your data

We need to gather your data to provide advice to you. The data provided will be analysed by us and, where you require a specific product, 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

In order for us to provide you with financial advice we need to collect personal data in order to provide recommendations in the areas of life assurance, pensions and mortgage lending. Our lawful reasons for processing your data under the GDPR are performance of a contract, compliance with our legal obligations, our legitimate interests and, in certain cases, your consent. These are set out in the Legal Basis table below.

In any event, we 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 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 and pension products, financial advice and quotations.

1.	Performing services for our clients and prospective clients — when you require insurance or 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: • AML and sanctions checking • Knowing your customer ("Fact Find") • Adherence to the Consumer Protection Code
3.	Communicating and marketing to you — we communicate with clients using email, text message, phone calls, written letters and via our website and social media channels.
4.	Processing claims — we submit any claim form to the relevant product provider on your behalf if requested by you.
5.	Contacting you if required, or responding to any communications that you might send to us.
6.	Administering our site, including data analysis, testing, research, statistical and survey purposes.
7.	Carrying out our obligations arising from any contracts entered into between you and us, and providing you with the information, products and services that you request.
8.	Providing our professional services to you.
9.	Handling complaints. Please see our complaints procedure on www.mortgageplan.ie.
10.	Notifying 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, and regulatory purposes in respect of the Central Bank of Ireland.
Consent	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, reinsurers and other insurance providers. We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely, and that we use clear and plain language. If you give us your consent you can withdraw it easily at any time. 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.
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 on you under the applicable data privacy laws. We rely on legitimate interests to group clients into service categories so that we can organise and allocate our ongoing service, and to manage and improve that service. Where processing is instead required of us by law or by our regulator — for example assessing and evidencing suitability, carrying out reviews, and maintaining client records — we rely on legal obligation rather than legitimate interests. We have carried out and documented a legitimate interests assessment for our client segmentation, and will provide a summary of it on request. Where we rely on legitimate interests you have the right to object to the processing. See Your Rights below.

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

How will we use the personal data we collect about you?

We 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 or ethnic origin — financial information is not classified as a special category 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.

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.

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 our 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 on to 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 are available to you as the data subject.

Who are we sharing your data with?

1.	Insurance partners where we need to manage the services provided to you, such as product providers and insurance underwriters, and financial institutions and lenders with whom we hold a written appointment as outlined in our Terms of Business.
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. These include the Central Bank of Ireland, An Garda Síochána, the courts, fraud prevention agencies and other bodies we are required by law to cooperate with.

3.	Third-party processors: we outsource certain 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, accounting and payroll providers, and CRM providers. • OA Life & Mortgages CRM • MTC Solutions, our IT partner 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.
4.	BeresfordMcArdle Unlimited Company trading as Dermot O'Malley & Company, our external auditors, where necessary for the conduct of company audits; and Hennessy Perrozzi Solicitors, where necessary to investigate a complaint or security threat.

AI-assisted processing

We use AI-assisted software provided by our technology suppliers to help us prepare documents, correspondence, reviews and analysis. These suppliers act as our data processors under written contract, and your information is not used to train their artificial intelligence models. Where such a supplier processes information outside the European Economic Area, we rely on the European Commission's Standard Contractual Clauses as the safeguard for that transfer.

Any advice, recommendation or client document produced with the assistance of these tools is reviewed and approved by a qualified financial adviser before it is issued to you. These tools are not used to make decisions about you.

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

We shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

We 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 is set out in our Retention Schedule, along with the criteria used to determine this period, including any statutory obligations we have. A copy is available on request.

Data subject rights

We facilitate you, our clients, in exercising your rights in line with our data protection policy and our 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 the right to correct data that we hold about you that is inaccurate or incomplete.
- Right to erasure — 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, you have the right to restrict the processing.
- Right to data 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 direct marketing at any time, and to object to processing we carry out on the basis of our legitimate interests, including our client segmentation. Where you object to processing based on legitimate interests we will stop unless we can show compelling legitimate grounds that override your interests, rights and freedoms.
- Rights in relation to automated decision-making and profiling — you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. We do not make decisions about you in that way; the tools we use are described under Profiling and automated tools above, and a person makes every recommendation.
- Right to a response — in the event that we refuse your request under rights of access, we will provide you with a reason as to why, and you may complain to the Data Protection Commission or seek a judicial remedy.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data, as we have indicated above.

Additional information

Retention of your personal data

Data will not be held for longer than is necessary for the purpose or purposes for which it was obtained. We will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (the 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 us, or about how your complaint has been handled, you have the right to lodge a complaint directly with our GDPR Owner and with the supervisory authority.

The supervisory authority in Ireland is the Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963 — www.dataprotection.ie.

Failure to provide further information

If we are collecting your data for a contract and you cannot provide this data, the consequence could be that the contract cannot be completed, or that details are incorrect.

Profiling and automated tools

We use automated tools to help us advise you. They are as follows.

a) Risk-profiling calculators. To help establish your attitude to investment risk for pensions and investments, we use calculators that produce an indicative risk category from a series of questions you answer.

b) Affordability and quotation tools. To indicate borrowing capacity or the affordability of premiums, and to produce quotations.

No decision about you is made solely by automated means. These tools produce an input. Your adviser considers that input alongside your circumstances, your objectives, your capacity for loss and what you tell us, and it is your adviser — a person — who forms any recommendation. Your adviser can and does depart from what a tool suggests, and where that happens the reason is recorded on your file. Where you apply for a mortgage or for protection cover, the lending or underwriting decision is made by the lender or insurer, not by us; their own privacy notice will explain how they make it.

We describe these tools here so that you understand how they are used, what information they rely on, and what you can do if you disagree with an outcome one of them suggests.

What this means for you. You may ask us how a risk profile or an affordability figure was arrived at, ask us to review it, and give us further information you think we should take into account. If you think a profile does not reflect you, tell your adviser and we will look at it again. You may also object to processing we carry out on the basis of our legitimate interests — see the Legal Basis table and Your Rights below.

Client segmentation and ongoing service

To make sure our ongoing service is appropriate and consistently applied, we group clients into service categories. This grouping is carried out by our advisers and is not an automated decision.

How the grouping works. Your category is based on the nature and value of the arrangements we look after for you, whether those arrangements need active ongoing management, and whether ongoing advice from us is likely to add value to you, together with your adviser's judgement. Your adviser may move you to a higher level of service and records the reason for doing so. Where your financial decisions are made under a formal decision-support or representation arrangement — for example a decision-making representation order, a co-decision-making agreement or a registered enduring power of attorney — you receive our highest level of ongoing review regardless of the value of your arrangements.

What each category means in practice. Your category determines how often and in what form we review your position with you — for example an annual review, an annual review with a mid-year valuation, or a one-off invitation to take up ongoing service. What each level includes is set out in our Client Service Schedule, which we publish alongside our Terms of Business and will provide on request.

How we make sure a lower level of service does not disadvantage you. Your category affects how often we come to you. It does not affect the standard of advice you receive, the care we take, or our obligations to you in respect of any product arranged through us — those attach to the product and to the advice given, and do not change with your category. No client is moved out of ongoing service without being written to twice and given a clear opportunity to opt in. Where we continue to hold an agency on a policy for a client we are not actively reviewing, that client receives a valuation each year as a minimum. And any client, at any level, can contact us at any time to ask about what they hold, ask for a valuation, or ask us to look at their position — you do not need to wait for a scheduled review, and you do not need a reason.

You may ask us at any time which category applies to you and why, and you may ask us to review it. Categories are reconsidered each quarter and whenever your circumstances change.

Additional processing

If we intend to further process your personal data for a purpose other than that for which the data was collected, we will provide this information prior to processing that 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@mortgageplan.ie.

Privacy policy statement changes

We 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 that you are aware of any changes. By using our services you agree to this privacy policy.

This privacy policy was last reviewed on 11 August 2026.