LHK Group Privacy Notice

LHK Group is committed to protecting and respecting your privacy. We aim to be transparent about how we process personal data and to demonstrate accountability under the General Data Protection Regulation (GDPR). This Privacy Notice explains how we collect, use, share, and protect your personal data, and outlines your rights.

For the purposes of data protection law, the controller of your personal data will normally be the LHK Group legal entity that provides services to you. The relevant entities are listed below. In certain circumstances, more than one LHK Group entity may jointly determine how and why your personal data is processed. Where this occurs, we will make the respective responsibilities of the entities clear to you.

LHK Group regulated entities:

LHK Insurance Ltd. T/A LHK Insurance and LHK Group. Company No. 515970.

LHK Kelleher Insurance Ltd. T/A LHK Kelleher Insurance, and LHK Group. Company No. 34377.

Finance One Ltd. T/A Finance One, LHK Mortgages, and LHK Group. Company No. 409757.

R J Croly & Co. Ltd. T/A LHK Group. Company No. 108865.

Insurances & Financial Services Ltd. T/A LHK Group. Company No. 156156.

Contact details:

Dublin: Rosemount House, Dundrum Road, Dublin 14, D14 P924	**Tel:** 01-205 5600
Drogheda: 12 Trinity Street, Drogheda, Co. Louth A92 RH63	**Tel:** 041 983 7660
Drogheda: 80 Trinity Street, Drogheda, Co. Louth A92 TW29	**Tel:** 041 983 7660

When we refer to “we”, “us” or “our”, we mean the relevant LHK Group regulated entity listed above that processes your personal data.

Please read this Privacy Notice carefully as this sets out the basis on which any personal data that you provide to us will be processed by us.

Who we are

LHK Group comprises regulated entities providing general insurance, mortgage and financial planning services to commercial and personal clients nationally.

How we collect your personal data

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. We may collect personal data when you:

- Request a service from us.
- Register for or use our websites or online applications
- Use our website or apps (including cookies and similar technologies).
- Engage with us on social media.

- Contact us with a complaint or enquiry.
- Apply for a position with us.

Sources of personal data

In most cases, we collect personal data directly from you. However, where relevant and permitted by law, we may also obtain personal data from third parties, including:

- Employers, pension scheme trustees, or scheme administrators
- Insurance providers, underwriters, or reinsurers
- Premium finance providers
- Introducers or professional advisers acting on your behalf
- Publicly available sources such as the Companies Registration Office (CRO) or the Register of Beneficial Owners

Where we obtain personal data from third parties, we will ensure this is done in accordance with GDPR and that you are informed where required.

Categories of personal data we collect

The categories of personal data we may collect include:

Contact and Identification information
Name, address, email address, mobile and landline numbers

Unique identifiers
PPS number, pension scheme reference numbers, and insurance policy numbers (where required to perform a contract).

Demographic details
Age, gender, marital status, lifestyle, insurance needs, date of birth, dependants, and photo identification. This may also include information about other individuals you wish to insure, such as a spouse or children.

Family and beneficiary data
Dependants, next of kin, nominated beneficiaries, Powers of Attorney, and contact details for solicitors, tax advisers, or accountants.

Employment information
Job role, employment status, salary information, benefits, and employment history. This information is required to complete our Fact Find process.

Publicly available information
Information available in the public domain, such as director details from the Companies Registration Office (CRO) or the Register of Beneficial Owners.

Health information (special category data)
Health status, medical history, medical assessments, personal habits (e.g. smoking or alcohol consumption), biometric data and disability information.

Pensions and insurance benefits information
Details of current benefits, pension entitlements, retirement date, voluntary contributions, and Pensions Adjustment Orders.

Financial information
Bank account details, credit history, bankruptcy status, salary, tax code, deductions, bonuses, benefits, and contribution data.

Claims data
Information relating to claims made by you or relevant third parties.

Marketing preferences
Your preferences in relation to receiving direct marketing communications.

Online and technical data
Information about your visits to our websites, including IP address and browser data. Further details are set out in our Cookie Policy.

Events and social media information
Information about your interest in or attendance at events, and your interactions with our social media channels (e.g. LinkedIn and Facebook).

Criminal convictions, offences and compliance checks
Information relating to criminal convictions or offences, but only where processing is authorised by law and necessary for the particular service or regulatory requirement. We may also carry out identity verification, sanctions, politically exposed person, anti-money laundering, fraud-prevention and credit-risk checks using appropriate third-party and publicly available sources.

Calculation data
Information used in calculators to generate quotations for life insurance or mortgage protection products.

Special categories of personal data
Where we process special categories of personal data, such as health information, we will identify both a lawful basis under Article 6 GDPR and an appropriate condition under Article 9 GDPR. Depending on the circumstances, this may include your explicit consent or processing necessary for the establishment, exercise or defence of legal claims. We will apply additional safeguards to protect this information.

Information we collect automatically
We may automatically collect certain information when you visit our websites or communicate with us electronically. This may include IP addresses, server logs, cookies and similar technologies. Non-essential cookies (including analytics and marketing cookies) are only used with your consent.

The use of cookies on our website
You can browse our website without providing personal information. Cookies used on our website may store both personal and non-personal data, such as language preferences or device type. You can manage or withdraw your cookie consent at any time using the Manage Cookies Consent option on our website. Further information on cookies is available at www.allaboutcookies.org.

How and why we use your personal data

How we use personal data	Legal basis
To provide quotations and arrange or administer insurance, mortgage and financial services	Taking steps at your request before entering into a contract and performing our contract with you
To communicate with you about your policies, products, applications and services	Performance of a contract and, where appropriate, our legitimate interest in managing our relationship with you
To meet anti-money laundering, Know Your Customer, sanctions, regulatory and record-keeping requirements	Compliance with a legal obligation
To assess insurance risk, affordability, suitability or eligibility for a product or service	Taking steps before entering into a contract, performance of a contract, compliance with legal obligations and, where relevant, legitimate interests
To manage and investigate claims	Performance of a contract, compliance with legal obligations, legitimate interests and the establishment, exercise or defence of legal claims
To respond to enquiries and complaints	Performance of a contract, compliance with legal and regulatory obligations, and our legitimate interest in managing complaints and improving our services
To arrange premium finance and facilitate payments	Taking steps before entering into a contract and performance of a contract
To prevent and detect fraud, financial crime and misuse of our services	Compliance with legal obligations and our legitimate interests in protecting our customers and business
To administer, secure and improve our websites, systems and services	Our legitimate interests in operating secure and effective systems; consent applies to non-essential cookies
To send marketing communications and manage marketing preferences	Consent or another basis permitted under applicable electronic-marketing law. Consent may be withdrawn at any time
To recruit employees and manage job applications	Taking steps at the applicant's request, compliance with legal obligations and legitimate interests
To establish, exercise or defend legal claims and obtain legal or professional advice	Our legitimate interests and, where relevant, the establishment, exercise or defence of legal claims
To notify you of changes to our services, terms or this Privacy Notice	Performance of a contract, compliance with legal obligations and legitimate interests

Use of AI, automated tools and profiling

We may use AI and automated tools to support certain business activities, such as research, scheduling, document preparation, data analysis, risk assessment, affordability checks and the generation of insurance quotations. These tools support our staff and are subject to appropriate human oversight.

We do not currently make decisions that produce legal or similarly significant effects on you solely by automated means. Where automated processing is used, you may contact us to request further information or human review where applicable.

Sharing your personal data

We may share personal data where necessary to provide our services, meet legal or regulatory obligations, protect our legitimate interests or where you have authorised us to do so. Depending on the service, recipients may include:

- Vetting and risk management agencies
- Legal advisers, loss adjusters and claims investigators
- Medical professionals (where relevant)
- Regulators and public authorities
- Third-party processors such as IT, payroll, and CRM providers
- Internal and external auditors
- Insurers, underwriters and reinsurers
- Banks, lenders and mortgage providers
- Pension, investment and other product providers
- Premium finance providers
- Other LHK Group entities, where necessary and lawful
- Identity-verification, AML, PEP and sanctions-screening providers

All third parties are required to protect your data and process it in accordance with GDPR.

International transfers

Where personal data is transferred outside the EEA, we ensure appropriate safeguards are in place, including adequacy decisions or Standard Contractual Clauses. Transfers to the UK are permitted under the EU adequacy decision.

Security

We implement appropriate technical and organisational measures to protect personal data against loss, unauthorised access, misuse, or disclosure.

Retention

We retain personal data only for as long as necessary for the purpose for which it was collected and to meet applicable legal, regulatory, accounting and reporting requirements. The retention period will depend on the type of record, the service provided, applicable regulatory and anti-money laundering requirements, and relevant legal limitation periods. Personal data is securely deleted or anonymised when it is no longer required.

Liability insurance

- If you hold insurance against a liability that may be incurred by you against a third party, where for whatever reason you cannot be found or you become insolvent, or the court finds it just and equitable to so order, then your rights under the contract will be transferred to and vested in the third party even though they are not a party to the contract of insurance. The third party has a right to recover from the insurer the amount of any loss suffered by them. Where the third party reasonably believes that you as policyholder have incurred a liability, the third party will be entitled to seek and obtain information from the insurer or from any other person who is able to provide it, including LHK Group concerning:
- the existence of the insurance contract,
- who the insurer is,
- the terms of the contract, and
- whether the insurer has informed the insured person that the insurer intends to refuse liability under the contract.

Your rights as a data subject

You have the right to:

- Access your personal data
- Rectify inaccurate data
- Request erasure (subject to legal limitations)
- Restrict processing
- Data portability
- Object to processing, including direct marketing
- Not be subject to a decision based solely on automated processing that produces legal or similarly significant effects, except where permitted by law.
- Withdraw consent at any time where processing is based on consent, without affecting the lawfulness of processing carried out before consent was withdrawn.
- Lodge a complaint with the Data Protection Commission

Complaints and contact details

If you have concerns about how we process personal data, please contact:

Email: dataprotection@lhkgroup.ie

Phone: 01 205 5600

You may also contact the Data Protection Commission
Data Protection Commission
21 Fitzwilliam Square South
Dublin 2, D02 RD28
Email: info@dataprotection.ie.
Website: www.dataprotection.ie

Failure to provide further information

Where we require personal data to enter into or perform a contract with you, or to comply with a legal or regulatory obligation, failure to provide the required information may mean that we are unable to provide the requested product or service or fulfil our obligations to you.

Changes to this Privacy Notice

When we update this Privacy Notice, we will post a revised version online. Changes will be effective from the date on which they are posted. We encourage you to review this Privacy Notice periodically so that you are aware of any updates.

This Privacy Notice was last reviewed on 23 November 2026.