

Privacy Policy

Thrust Financial Services Ltd t/a Capital Plan, Mortgage Plan

Version

February 2026

Introduction

Thrust Financial Services Ltd t/a 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 t/a 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 t/a Capital Plan, Mortgage Plan.**

- **Thrust Financial Services Ltd t/a 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 t/a Capital Plan, Mortgage Plan.

Who are we?

Thrust Financial Services Ltd t/a 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

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 t/a 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 t/a 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 t/a 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 t/a 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 t/a Capital Plan, Mortgage Plan use the personal data it collects about me?

Thrust Financial Services Ltd t/a 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 t/a 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 fulfill 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.

Data Subjects Rights

Then Thrust Financial Services Ltd t/a 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

Registered Address: 14 Mach House, North Street Business Park, Swords, Co. Dublin, K67A037

Director: Andrew Nolan. Registered in Dublin, Ireland. Company Registration No: 802474
Thrust Financial Services Ltd t/a Capital Plan, Mortgage Plan is regulated by the Central Bank of Ireland

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 t/a 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 t/a 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 t/a 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 t/a 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 t/a 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 t/a 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 24 February 2026.

