



# Start Mortgages

## PRIVACY NOTICE

### Start Mortgages

Trimleston House, Beech Hill Office Campus,  
Clonskeagh, Dublin 4. D04CK80. Ireland.

[www.start.ie](http://www.start.ie)

Start Mortgages DAC, (trading as Start Mortgages), is regulated by the Central Bank of Ireland.

## Introduction

This Privacy Notice is issued by Start Mortgages DAC, Trimleston House, Beech Hill Office Campus, Clonskeagh, Dublin 4, D04CK80, and the beneficial owner of your mortgage (*see the list of Beneficial Owners at the end of this document*), who act as joint controllers of your personal data in line with our obligations under the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”) and the Data Protection Act 2018.

The purpose of this Privacy Notice is to inform you of the personal data relating to you that we collect, the uses (including disclosures to third parties) we make of your data and what rights you have in relation to your personal data.

Start Mortgages DAC have day to day responsibility for all matters relevant to your personal data processing. If you have any questions about our use of your personal data, please contact us at customerservices@start.ie or write to the Customer Services Manager at the above address.

## Personal Data that we Collect and Process – Borrowers

We may collect, have transferred to us and process personal data relating to you during the course of our relationship with you. Such personal data may include:

- your name, date of birth, gender, marital status, occupation, family composition and contact details, including your address, phone number and email address;
- your PPS number;
- your debit card and or bank account details;
- other financial information relating to your account with us including details of your income, expenditure, debts and assets, including property assets, bank accounts, shares, motor vehicles, redundancy payments, investments and other assets;
- information about your credit history from the Central Credit Register;
- images and voice recordings; and
- health data e.g. contained in medical reports etc.

We may record voice calls with you for the management of your account. At the start of any such call, we note that the call is recorded for training and verification purposes and for the purposes of managing your account and that any information that is provided during the call will be retained for the management of your account.

We operate CCTV at our business premises so if you were to visit our office your image will be captured on CCTV. Such CCTV is used primarily for security purposes. Where relevant and proportionate, CCTV images may be used in connection with legal proceedings and/or shared with An Garda Síochána for the purposes of a criminal investigation/criminal proceedings

We may collect and process criminal conviction data relating to you for the purposes of performing our contract with you, where we are required by law, or where it is necessary for the purposes of or in connection with actual or prospective legal claims or proceedings (subject always to ensuring suitable and specific safeguards for the processing of this personal data).

Where we collect personal data relating to your family, this may include personal data relating to children under 18. Any such data will only be collected and processed for relevant and proportionate purposes. We understand that extra considerations must be taken when processing the personal data of children under 18, and have taken this into account in putting in place appropriate procedures and safeguards for the protection of this personal data.

The terms of this Privacy Notice also apply as appropriate to any person or entity who guarantees a borrower's obligations under a loan agreement (i.e. "guarantors").

### **Personal Data that we Collect and Process – Website Usage**

When you access our website ([www.start.ie](http://www.start.ie)) your computer's browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data on the use of our website. This information may be used to help us to improve our website and the services we offer.

### **Purposes of Processing and Legal Basis - Personal Data**

We may use personal data relating to you for the purposes of and based on the legal bases set out below

Purpose	Legal Basis for Processing
<ul style="list-style-type: none"> <li>• administering your loan/mortgage with Start Mortgages, including by corresponding with you and processing payments from you, obtaining information from the Central Credit Register and reviewing your account in the event of arrears and or default in assessing and ensuring affordability and suitability. In connection with these matters, you may provide to Start Mortgages some special categories of personal information (e.g. information about your health)</li> </ul>	<ul style="list-style-type: none"> <li>• it is necessary for compliance with a legal and regulatory obligation that applies to us, e.g. to comply with our obligations to the Central Bank of Ireland</li> <li>• it is necessary for the performance of a contract to which you are a party</li> <li>• it is necessary for the purposes of our legitimate interests in conducting our business in a responsible and commercially prudent manner and dealing with any disputes that may arise</li> <li>• in the case of special category data, such as health data, <ul style="list-style-type: none"> <li>○ (i) to the extent necessary and proportionate in connection with the mortgaging of property in accordance with Section 50(d) of the Data Protection Act 2018, or</li> <li>○ (ii) where the processing is otherwise necessary for</li> </ul> </li> </ul>

	<p>reasons of substantial public interest on the basis of applicable law or</p> <ul style="list-style-type: none"> <li>○ (iii) where the processing is necessary for the establishment, exercise or defence of legal claims.</li> </ul>
<ul style="list-style-type: none"> <li>• establishing your identity and/or proof of address</li> </ul>	<ul style="list-style-type: none"> <li>• it is necessary for compliance with a legal obligation that applies to us e.g. to comply with our obligations under the Criminal Justice Act 2013</li> <li>• it is necessary for the performance of a contract to which you are a party; and</li> <li>• it is necessary for the purposes of our legitimate interests in conducting our business in a responsible and commercially prudent manner.</li> </ul>
<ul style="list-style-type: none"> <li>• uploading personal data to the Central Credit Register</li> </ul>	<ul style="list-style-type: none"> <li>• it is necessary for compliance with a legal obligation that applies to us e.g. to comply with our obligations under the Credit Reporting Act 2013</li> </ul>
<ul style="list-style-type: none"> <li>• dealing with complaints, claims</li> </ul>	<ul style="list-style-type: none"> <li>• it is necessary for</li> </ul>

<p>or legal proceedings</p>	<p>compliance with a legal obligation that applies to us, e.g. responding to queries from authorities such as the An Garda Síochána, the Financial Services and Pensions Ombudsman, the Data Protection Commission</p> <ul style="list-style-type: none"> <li>• it is necessary for the purposes of our legitimate interests in conducting our business in a responsible and commercially prudent manner and dealing with any disputes that may arise</li> </ul>
<ul style="list-style-type: none"> <li>• maintaining the safety of visitors and employees and protecting company property</li> </ul>	<ul style="list-style-type: none"> <li>• it is necessary for compliance with a legal obligation that applies to us e.g. the Safety, Health and Welfare at Work Act 2005</li> <li>• it is necessary for the purposes of our legitimate interests in conducting our business in a responsible and commercially prudent manner and dealing with any disputes that may arise</li> </ul>
<ul style="list-style-type: none"> <li>• We may collect website usage data to generate and analyse statistics regarding the overall usage of the website</li> </ul>	<ul style="list-style-type: none"> <li>• it is necessary for the purposes of our legitimate interests in conducting our business and</li> </ul>

	operating our website in a responsible and commercially prudent manner and dealing with any disputes that may arise
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**Requirement to Provide Data**

Please note personal data is necessary for us to administer your loan/mortgage and if you refuse to provide us with certain personal information, this may adversely influence how we manage your account under the Code of Conduct on Mortgage Arrears.

**Recipients of Data**

We may disclose your personal data in connection with the above purposes, including:

- to third parties who we engage to provide services to us, such as IT service providers, professional advisers, solicitors, auditors and outsourced service providers;
- to competent regulatory authorities or bodies including the Central Credit Register as requested or required by law;
- to banks or other financial companies that finance the purchase of loans by Start Mortgages, and to other companies involved in loan securitisation;
- to Third Party Authorities that act for you;
- to the applicable beneficial owner(s) listed at the “*Beneficial Owners*” section below;
- to any person or entity that guarantees your obligations; and
- in the case of joint owners, a disclosure of details in relation to one joint owner to the other joint owner where relevant and proportionate. For example, where a protective certificate as part of an insolvency event has been issued in favour of one joint owner, then we may need to notify the other joint owner if such protective certificate also directly or indirectly affects the other joint owner.

### **Retention**

We will not retain your personal data for longer than necessary. We retain your personal data only for as long as we need it for the purposes described above, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between you and us.

### **Security**

We take our security responsibilities seriously and we employ appropriate physical and technical measures (including staff training and awareness) to protect your data. We review our security measures regularly to ensure that they meet our strict requirements.



## Cookies

A cookie is a block of data that a web server places on a user's machine. Typically, it is used to ease navigation through the website however, it is also a useful means of the website identifying the user, tracking the user's path through the website, and identifying repeat visits to the website by the same user (or same user's machine). Our website does not currently use cookies. If this changes, we will include full details of this on our website

## Transfers Abroad

If we transfer your personal data to a country outside European Economic Area ("EEA"), we will only transfer (i) to a country that provides an adequate level of protection for personal data as set down by the European Commission ("EC"), or (ii) where we have entered into a contract governing the transfer which contains the 'standard contractual clauses' approved for this purpose by the EC or (iii) where we have identified an alternative transfer mechanism which complies with Chapter V of the GDPR.

If you would like to receive further details of the measures that we have taken in this regard, please contact us at [customerservices@start.ie](mailto:customerservices@start.ie).

## Your Rights

You have the following rights, subject to certain restrictions, in relation to your personal data:

- the right to access your personal data;
- the right to request the rectification and or erasure of your personal data;
- the right to restrict the use of your personal data;
- the right to object to the processing of your personal data;
- the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller;
- the right not to be subject to a decision based solely on automated processing; and
- the right to withdraw your consent at any time where processing is based on consent.

In order to exercise any of these rights, please contact us at [customerservices@start.ie](mailto:customerservices@start.ie) or write to the Customer Services Manager, Start Mortgages DAC, Trimleston House, Beech Hill Office Campus, Clonskeagh, Dublin 4, D04CK80.

### **Changes to the Privacy Notice**

Our Privacy Notice may change from time to time and any changes to the notice will be posted in this document which is available on our website.

### **Complaints**

If you are not happy with the way we have used your information or addressed your rights, you have the right to make a complaint to the Data Protection Commissioner by writing to:

#### **The Data Protection Commission**

Canal House,  
Station Road,  
Portarlinton,  
Co. Laois, R32 AP23, Ireland.

Dublin Office:  
21 Fitzwilliam Square,  
Dublin 2.  
D02 RD28, Ireland.

Phone +353 (0) 1 7650100 / +353 1800 437 737

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

## Sale of Business

Please note that we reserve the right to transfer information (including your personal data) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of the Privacy Notice. The legal basis upon which we will transfer such information is:

- with regard to personal data, that this is necessary for the purposes of our legitimate interests (and those of the third party transferee) in conducting business in a responsible and commercially prudent manner; and
- with regard to special categories of personal data (such as health data), that the processing is necessary and proportionate for the purposes of the mortgaging of property or that it is otherwise necessary for reasons of substantial public interest on the basis of applicable law.

## Beneficial Owners

The communication address for each beneficial owner is listed below:

- European Residential Loan Securitisation 2019-NPL1 DAC,  
(1-2 Victoria Buildings, Haddington Road, Dublin 4.)
- European Residential Loan Securitisation 2019-NPL2 DAC,  
(1-2 Victoria Buildings, Haddington Road, Dublin 4.)
- European Residential Loan Securitisation 2020-NPL1 DAC,  
(1-2 Victoria Buildings, Haddington Road, Dublin 4.)
- Lansdowne Mortgage Securities No. 1 Plc,  
(2 Grand Canal Square, Grand Canal Harbour, Dublin 2.)
- Lansdowne Mortgage Securities No. 2 Plc,  
(2 Grand Canal Square, Grand Canal Harbour, Dublin 2.)
- LSF IX Java Investments DAC,  
(Fitzwilliam Court, Leeson Close, Dublin 2.)
- LSF IX Paris Investments DAC,  
(Fitzwilliam Court, Leeson Close, Dublin 2.)
- LSF XI Glas Investments DAC,  
(Fitzwilliam Court, Leeson Close, Dublin 2.)
- LSF XI Glas II Investments DAC,  
(Fitzwilliam Court, Leeson Close, Dublin 2.)
- LSREF III Stone Investments DAC,  
(Fitzwilliam Court, Leeson Close, Dublin 2.)
- Merrion Square Residential 2023-1 DAC,  
(1-2 Victoria Buildings, Haddington Road, Dublin 4.)
- Primrose Residential 2021-1 DAC,  
(1-2 Victoria Buildings, Haddington Road, Dublin 4.)
- Shamrock Residential 2022-2 DAC,  
(1-2 Victoria Buildings, Haddington Road, Dublin 4.)

- Shamrock Residential 2023-1 DAC,  
(1-2 Victoria Buildings, Haddington Road, Dublin 4.)



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