

Your personal  
data is important  
and taking steps  
to protect it is a  
priority for us

Data Protection Notice

How we use your personal data  
and your data protection rights

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# Data Protection Notice

Your personal data is important to you and protecting it is a priority for us. This data protection notice explains how we, as a “data controller” under the General Data Protection Regulation (“GDPR”) use your personal data, and your rights, as a “data subject”, in relation to your personal data.

## 1. Who we are

When we talk about ‘PTSB’, or ‘we’ or ‘us’, we are talking about Permanent TSB plc trading as PTSB and PTSB Asset Finance with registered offices at 56-59 St. Stephen’s Green, Dublin 2, D02 H489, Ireland. and registered company number 222332, and its parent company (Permanent TSB Group Holdings plc), subsidiaries and affiliates.

Permanent TSB plc trading as PTSB and PTSB Asset Finance is a provider of retail and business banking services in Ireland. We offer savings, current accounts, overdrafts, credit cards, term loans, mortgages, invoice financing and asset financing (e.g. financing for private cars and commercial vehicles). We also act as an intermediary for home insurance, life assurance, investments and pensions.

For more information, visit [www.ptsb.ie](http://www.ptsb.ie)

## 2. What is personal data

When we talk about personal data we are talking about any information that relates to you.

Personal data covers items such as name, address, email address, mobile number, date of birth and Personal Public Service Number (‘PPSN’). It also includes the numbers of any accounts or policies you hold, and financial information, including details of transactions and balances appearing on your account, information on your personal finances including sustainability preferences or requirements, details relating to creditworthiness and information on any collateral or security you provide to us. Personal data also includes certain communications you may have with us or our service providers, for example, letters, emails, documents, recorded calls, and call transcripts relating to you, your services, or your security that we or our representatives may hold relating to you.

Personal data also includes special categories of data relating to you which attract additional protection, such as data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and your genetic data, biometric data for the purpose of uniquely identifying you for some of our services, or data concerning your health or sexual orientation.

In addition, personal data includes data relating to criminal convictions and offences, We also collect various other types of data including the geographical location of your device, online identifiers such as Internet Protocol address (IP address), your device ID, and other information linked to your device. This information helps us to establish your location when you use online banking in order to help prevent fraud and comply with regulatory requirements.

### 3. How we collect your personal data

We ask you directly for the personal data that we require to deliver our products and services to you. In addition, we gather your personal data:

- Through our interactions with you, for example via email, postal correspondence, telephone calls, video calls, over our websites and the PTSB Mobile Banking App, including our Support Chat function.
- When you enquire about, make an application for, or use, any of our products and services, including through the transactions you make and the technology you use, such as our online services (e.g. website, apps).
- If you allow it, during an application process, we can securely access your account information from other regulated financial institutions. This helps us understand your overall financial situation better and make quicker decisions on your application for financial services or products, like mortgages and loan applications.
- From publicly available sources, such as electoral registers, the Companies Registration Office and online media.

We will also, with your consent, collect your location data (e.g. to help you locate a branch via the PTSB Mobile Banking App or to apply for an Explore Account in-App) and gather data through the cookies we use on our website. Cookies are small text files that may be stored on your computer or mobile device that contain data relating to a website you visit. For more details on how we use cookies, see our Cookie Notice, which is available on [ptsb.ie/legal-information/our-policies-other-important-information/cookies/](https://ptsb.ie/legal-information/our-policies-other-important-information/cookies/)

In addition, we receive personal data from third parties such as credit reference agencies, credit intermediaries (including, but not limited to, car dealerships), fraud prevention or government agencies. We may also receive your personal data from third parties such as brokers if you engage with them in relation to availing of any of our products or services.

Please note that if you provide us with another person's personal data (e.g. in a joint application for a bank account or insurance product) you need to obtain their consent to do so and provide them with this data protection notice.

We may sometimes process your personal data even if you are not our customer, for example, if you process debit and credit card transactions with our customers, if you receive payments from our customers, if you are a guarantor, director, shareholder, an additional card holder, a representative, or authorised attorney of our customers. In such cases, we will process your personal data in accordance with this notice.

## 4. How we use your personal data

We collect and use (or "process") your personal data for a number of different reasons. Any time we process your personal data, we must have a legal basis to do so. The various ways we process your personal data and the legal bases we rely on are outlined below:

### 4.1 For the performance of our contract with you

We process your personal data in order to offer or provide the products or services that we have agreed with you in accordance with our terms and conditions. This includes processing to:

- Help us assess and understand your requirements and, where relevant, your capacity to repay a loan. In this context, we will collect and use information provided by you at the time of application, information obtained from credit reference agencies and information we may already hold about you. This includes details such as your employment status, salary and financial commitments (monthly outgoings, number of dependants etc.), and the manner in which you manage your bank accounts. For more information on how we use credit scoring to assess applications, see section 6 below
- Set up and manage your account(s), policies and any other services.
- Contact you by post, telephone, video call, text message, email or via our Open24 Online Banking or PTSB app, including to provide you with service related information.

- Process the transactions associated with your account(s) including payments made by or to you, deposits, withdrawals, interest and other agreed fees and charges.
- Manage the administration of any loyalty or reward programmes that you may have signed up to.
- Administer and manage any account that is in joint names, or any loan that has a co-borrower or guarantor, including processing the other party's personal data, and disclosing your personal data to that party, if required in relation to such account(s) or loan.
- Facilitate any restructure of your loan or other contract with us. For this purpose, we may need to request and process additional personal data from you, such as details regarding your income and expenditure.
- Manage any arrears on your account(s) and, where necessary, facilitate the recovery of outstanding borrowings or liabilities due to the Bank. In such circumstances, we may use third-party debt recovery agencies and solicitors, and, in this context, disclose your personal data to such parties as is necessary in the circumstances.

#### **4.2 Where you provide your consent**

We may, at times, request your consent to process your personal data for specific reasons, such as:

- Where we wish to provide you with marketing information in relation to PTSB products and services, or partner company products or services, which we believe may be of interest to you. We will only contact you for direct marketing purposes where you have specifically consented, and you may opt out of direct marketing at any time (see section 12 below).
- Where you have appointed a third party to assist or represent you and deal with us on your behalf (for example in an arrears situation) and we need to share your personal data with them.
- Where we need to process special categories of data (for example, where you disclose health related data in the context of a forbearance request). We may also process your biometric data to verify your identity when you open or operate your account or product with us. In such cases we will ask for your explicit consent.
- Where you have engaged a broker to assist you, and you wish us to share information in relation to your selected product or service with your broker.

Where we process your personal data on the basis of your consent,

you have the right to withdraw your consent at any time (see sections 11 and 12 below for more details).

### 4.3 For compliance with our legal obligations

We will use your personal data to the extent necessary in order to comply with applicable legal and regulatory obligations. We will process your personal data on this basis, including but not limited to the circumstances described below:

- To fulfil our tax and regulatory reporting obligations, for example:
  - verifying your PPSN (or foreign equivalent) to comply with Revenue requirements
  - collecting, reviewing and reporting certain information (such as your jurisdiction of residence and Tax Identification Number) to Revenue and applicable international tax authorities in compliance with the Common Reporting Standard ('CRS') and Foreign Account Tax Compliance Act ('FATCA')
- Where we are required to disclose information by or to a court or regulatory authority with appropriate jurisdiction, or to law enforcement agencies such as an Garda Síochána.
- To comply with our legal obligations under anti-money laundering ('AML')/ counter-terrorist financing and sanctions laws, we will:
  - request certain documents, such as photo ID and proof of address, at account opening and at intervals thereafter in order to verify your identity and address; and retain a copy of these on file
  - conduct customer due diligence checks in line with the risk of financial crime
  - screen new applications, existing customers and incoming/ outgoing payments to comply with international laws on sanctions, combatting terrorism and other financial crime
  - if any suspicion of financial crime activity is identified, report to relevant law enforcement authorities
- To assess your suitability for a particular product.
- For compliance with our obligations under the Central Bank of Ireland ('Central Bank') Consumer Protection Code or other Central Bank codes of conduct, which includes retaining data in relation to the provision of financial products and services to you for specified time periods.

- Before offering you a loan or other credit product, we are required to assess your ability to repay. To do this, we will check your credit records with credit reference agencies, such as the Central Credit Register ('CCR').
- We are required under the Credit Reporting Act 2013 to report to the CCR on how you repay your loan or other agreed credit facility (including reporting any arrears or failure to repay such facilities). This also includes data on guarantors and guarantees in respect of prospective credit agreements.
- Your credit records will be available to lending institutions and may affect your future ability to borrow.
- If you have a mortgage or other credit facility with us, and you fall into arrears, we will use your contact details to get in touch with you to understand the cause and try to help you address your arrears problem.
- In the event that we repossess a property you own which secures any liabilities owed to us, we will, if requested by Revenue, provide Revenue with certain personal data relating to you, such as your name, date of birth and correspondence address, in order to facilitate the assessment and collection of Capital Gains Tax, Income Tax and Value Added Tax.
- Where required or permitted by law we will process data in relation to criminal convictions and offences, including in the context of applications for home insurance products.
- To comply with our obligations to assess and manage our credit risk and to have an up-to-date view and understanding of all credit facilities, we analyse our customer loans, current and historical, using complex mathematical models. We will include your data in this analysis.

#### **4.4 Where necessary, in our legitimate interests**

We process your personal data where it is in our legitimate interests as a bank. When we process your personal data in our own interests, we will seek to maintain a balance between our interests and your rights and freedoms. We will process your personal data on this basis:

- In certain circumstances we will check your credit records with the Central Credit Register under powers granted by the Credit Reporting Act 2013.
- For day to day operational and business purposes to ensure we conduct our business in a responsible and commercially prudent manner including for:

- management, financial and regulatory reporting
- we carry out activities such as: internal administration, communication, operational efficiency and planning, including statistical analysis, modelling and research, strategic planning and audit purposes
- management of PTSB legal and compliance affairs
- maintaining and improving internal business processes, such as creating efficiencies in the manner in which we conduct our day to day business to ensure our processes are cost effective and optimised to best serve our customers
- use of AI-powered productivity tools, to assist with tasks such as drafting content, transcription of calls and meetings, summarising information, and generating insights.
- management of network and information security including testing our websites and other systems, and ensuring fraud prevention protections are in place
- maintenance of business continuity, disaster recovery and back up arrangements
- ensuring the safety of our staff, customers and premises, for example through the recording of CCTV images at PTSB premises and ATMs, and processing such CCTV images where necessary for security, crime and fraud prevention purposes
- We will share your personal data with third party service providers where necessary in our legitimate interests for operational and business purposes. Examples of such third parties are listed in section 7 below.
- To help us improve our services and systems, and our customers' experience with us through:
  - analysis of personal data generated from your use of our services
  - quality assurance of our sales and services including the review of our application processes, recorded calls, webchat transcripts, online and branch interactions to identify training and process improvements
  - analysis of complaints, errors and feedback
- To understand and assess our customers' requirements, and to help us continually develop, improve or identify products and

offerings for our customers (including to identify products which might be relevant and personalised to you); for these purposes, we carry out activities such as:

- analysis of trends and behaviours in the usage of our products and services, for example the use of Open24, our banking app and branch visits
- market research at individual, group or industry level
- analysis of customer demographics such as gender, age and occupation
- transactional analysis, for example in relation to direct debits, average balances and purchases, this can include applying categories to the transaction information you create and provide which assists us to make faster decisions in relation to mortgage and other loan applications.
- combining data from your interactions with us across multiple platforms to create a single view of your relationship with PTSB
- placing you into a segment with similar customers, in order to better tailor our products and services, and our marketing messages, to your individual needs
- combining your personal data with third party data such as economic or research data

In carrying out the above activities, we may share your personal data with our service providers, including when contacting you for customer or market research or to deliver personalised communications. You can ask us to stop using your data for direct marketing purposes at any time (see section 12 below).

- We may also contact you (e.g. via your email address) to carry out surveys to help us improve our products and services.
- We record and monitor our interactions with you including telephone calls, webchat transcripts and electronic communications. This is in the interests of training, verification, analysis, quality assurance and for regulatory purposes.
- When obtaining advice from external legal advisors and other advisors that we may engage, we may need to share certain personal data.
- In connection with the reorganisation or sale of the whole or part of our business or the transfer (including by way of securitisation or loan portfolio sale) of any loan or product provided to you.

- In circumstances where we repossess your property, we may, if requested by Revenue/Local Authorities, provide them with certain personal data relating to you, such as your name, date of birth and correspondence address, in order to facilitate the assessment and collection of Local Property Tax ('LPT') and the Non Principal Private Residence ('NPPR') charge.

## 5. Implications of not providing your personal data

Please note that, in some cases, if you do not provide the personal data we need, or help us keep your data up-to-date, we may not be able to continue to operate your account and/or provide certain products and services to you.

## 6. Decisions made using automated processing

We use automated processing for example, in connection with our money laundering, fraud and terrorist financing prevention obligations. We may also use automated processing to screen for suspicious transactions, or to identify payments which may be subject to international sanctions and to monitor calls, transactions and patterns to prevent and investigate fraud.

### 6.1 Credit scoring

When you apply for a credit facility, asset financing, or business leasing, an automated statistical analysis or evaluation known as "credit scoring" may be included as part of the credit assessment process. This helps determine whether the product suits your needs and also assesses risk consistently and fairly. This automated process is essential in evaluating your application and forming a credit agreement with you.

Credit scores are calculated using various data points, including information you provide us, data from credit reference agencies, and any existing information we may have about you. This can involve your salary, financial commitments, account management, current borrowings, spending habits, payment history on past credit facilities, and any relevant court orders or judgements, such as bankruptcy declarations.

Credit scoring is only one part of the overall assessment when you apply for a loan. We regularly test our credit scoring models to ensure they remain fair, reasonable, effective, and unbiased.

## 6.2 Credit Decisions based on solely automated data processing

When you apply for a credit product on-line, the decision whether to approve credit may be made based solely on automated processing and scoring of your application, using the information and methodology described at 6.1 above.

If you do not agree with any decision we make in relation to you which is based solely on automated processing, you can speak to a branch member or call Open24.

## 7. Who we share your personal data with

We will share your data, when necessary, within PTSB. In addition, we will share your personal data (as described in Section 2 above) with third parties in the course of providing our services to you, and where necessary based on our legitimate interests for business, legal and regulatory purposes, including in the circumstances described below:

- We will share your personal data with third parties who provide a service to us, for example:
  - print and distribution services providers
  - legal advisors
  - debt recovery agencies
  - tracing agencies
  - estate agents
  - professional services consulting firms
  - identity verification agencies, fraud and financial crime technology providers
  - IT solutions companies including cloud service and storage providers
  - electronic signature technology providers to facilitate contract execution
  - marketing and market research agencies
  - companies we appoint to help us manage arrears resolution and companies we appoint (including Pepper Ireland) to provide loan servicing or asset management and administration services

- our instant mobile payments service provider
- our loyalty and reward programme partners
- secure storage facility providers
- in the context of asset finance, with asset finance intermediaries and insurance providers
- We will share your data where necessary to facilitate payments to or from your account, for example with other banks and payment processing service providers, with our card issuer, Visa, with providers of payment-processing schemes such as SWIFT (Society for Worldwide InterBank Financial Telecommunications) which enables money transfers, and EBA Clearing, which enables transfers in euros within the SEPA area (Single Euro Payments Area) and, where you have signed up for digital wallet services, with providers such as Apple Pay or Google Pay.
- Where you have chosen home insurance and/or life assurance products with our insurance partners, we will share your data with those companies in connection with the provision and administration of insurance products and related services.
- Where we partner with the Strategic Banking Corporation of Ireland (SBCI) to provide loans, or with companies who provide services such as invoice financing.
- Where we re-organise, sell or transfer all or part of our business (including by way of securitisation or loan portfolio sale of any loan or product provided to you), information may be shared with any relevant third party.
- If your loan is transferred, we will continue to retain and process your personal data for a minimum period after the transfer, for compliance with Central Bank of Ireland or other legal or regulatory requirements, including engaging with the relevant third party in relation to your loan where required for such purposes.
- We also have to share information with third parties where required by applicable law or regulation including to statutory, regulatory and enforcement authorities, such as Irish Government or statutory bodies (for example Revenue, the Central Bank of Ireland, the Data Protection Commission).
- Where required or permitted by law we will share your information with law enforcement agencies such as An Garda Síochána which includes divisions such as the Financial Intelligence Unit and the Criminal Assets Bureau.

- We will share your personal data with your authorised representative, such as for assisted decision-making, appointing a trusted third party, or to provide financial information to authorities for state-assisted programmes like the “Fair Deal Scheme”.

If you hold an account in joint names, or any loan that has a coborrower or guarantor, your personal data may be shared with the other party. In the case of a joint account, certain details in relation to the joint account may be shared with a joint account holder’s personal representatives if required.

In circumstances where we engage a third party service provider, we require assurances that they have implemented appropriate safeguards and controls in relation to the protection of personal data.

In any case where we share your personal data with a third party data controller (including, as appropriate, counterparties to transactions on your accounts), the use by that third party of your personal data will be subject to that third party’s own data protection policies.

Where you engage a regulated third party payment services provider (Account Information Service Provider (‘AISP’) or Payment Initiation Service Provider (‘PISP’)) to provide services involving your online accessible accounts, they will have access to view and transact on all accounts that are available for you to view on Open24, which will include your personal data. This can include accounts on which you are a joint account holder or otherwise have access. You need to let any other person who has an interest in a joint account or other account to which you have access know that you have appointed a third party payment service provider.

If you choose to submit your PTSB bank statements electronically to other financial services providers, e.g. when applying for another banking service, the other bank will request your consent to allow us to share your information.

## 8. Transferring your personal data outside of the EEA

Personal data may, at times, be transferred outside Ireland in connection with transactions on your account or in connection with the services you receive from us. Such transfers will be made in accordance with your instructions, where you have explicitly consented, and/or as otherwise required or permitted by law.

We may transfer your data outside of Ireland to other countries within the European Economic Area (‘EEA’), which have data protection laws which

are the same as or broadly equivalent to Irish data protection law.

Some transfers may be to countries outside of the EEA. Some of those countries we may transfer your personal data to outside of the EEA have data protection laws that have been deemed, by the European Commission, to be the same or equivalent to those in Ireland. However, if we transfer your personal data to countries which have not been deemed to have data protection laws that are the same or broadly equivalent, we will take steps to put appropriate safeguards in place to comply with our obligations under applicable data protection law and ensure that your personal data is still protected. The measures that we rely on to protect your personal data when it is transferred to such countries include:

- use of Standard Contractual Clauses that have been approved by the European Commission.
- reliance on Binding Corporate Rules.
- reliance on one of the derogations set out in Article 49 of the GDPR, such as where the transfer outside of the EEA is necessary for the performance of a contract.

We also take measures to ensure that entities that provide services to us, that subsequently transfer your personal data outside the EEA, have in place appropriate safeguards to comply with data protection laws and ensure that your data is still protected.

More information in relation to international data transfers and the safeguards which can be implemented can be obtained on the EU Commission website:

[commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/rules-international-data-transfers\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/rules-international-data-transfers_en)

## 9. How long we keep your personal data

We will retain your personal data for no longer than is necessary for the purpose for which it was obtained by us as a data controller or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes, including, if relevant, to deal with any claim or dispute that might arise in connection with the services you receive from us.

In general, the period for which we retain your personal data will be determined having regard to, amongst other matters, any statutory obligations imposed on us by law. For example, we are required under the Consumer Protection Code to retain certain information (e.g. details of products and services provided to you) for 6 years after the end of our relationship with you.

We may, in certain cases, retain your information for longer periods, particularly where required by order of a court, or in the context of an investigation by regulatory or law enforcement agencies. This is to ensure that we will be able to produce relevant records as evidence, if required.

## 10. Keeping your personal data safe and secure

We have implemented technical and organisational security measures to protect your personal data when it is being processed and stored. These include:

- Controlling access to help prevent unauthorised viewing or alteration of your personal data.
- Minimising the data sets and/or anonymising data that we use to protect our customers when we process your personal data for the various activities outlined above
- Using encryption mechanisms, where appropriate.

## 11. Use of Artificial Intelligence

We can use AI technology to make sure your identity is verified quickly and securely, to detect and prevent fraud, and to improve the quality and efficiency of the services you receive. Additionally, AI assists us prepare statistical analyses that offer valuable insights into our customer behaviour and financial trends. We will implement all necessary safeguards when utilising AI relating to your personal data, ensuring compliance with applicable laws and regulations.

## 12. Your rights in relation to your personal data

Under data protection law, you have a number of rights in relation to your personal data. You have the right to:

- **Access:** to know if we process your personal data, access your personal data and receive a copy of your personal data that we process in paper or (if you request) electronic form.
- **Rectification:** to have your data rectified where it is shown to be inaccurate or out of date
- **Erasure:** to have your data erased in certain circumstances (for example if you withdraw your consent to the processing of such data, provided that there is no legal requirement for us to retain it).

- **Restriction:** to request a restriction on our processing of your personal data, for example, where you believe that:
  - the processing is based on inaccurate data, or
  - we are not processing your personal data in a lawful manner
- **Objection:** to object to processing activities in our legitimate interests, including the right to object to profiling on this basis (such as the activities described in section 4.4 above) where such activities impact on your rights and freedoms as an individual and we have no compelling interests outweighing your rights and freedoms.
- **Portability:** to receive a copy of your personal data in a portable format in circumstances where you have provided your data on the basis of your consent, or for the provision of our services and which is generated through the use of that service. You can also request that a copy of this data-set is sent to another bank or other service provider. Please note however that where you have asked us to send your personal data to a third party, we are not responsible for their use of your personal data. We would recommend that you read any data protection notice that such third party provides to you.
- **Withdraw your consent:** to withdraw any consent that you have provided for specific processing activities. Please note that if you withdraw your consent to our processing of your personal data for any specific activity, this will not affect the validity of any processing carried out on the basis of your consent prior to such withdrawal.

PLEASE NOTE: The above rights are subject to exemptions and may not apply in all circumstances. If you object to, or ask us to restrict, our processing of your personal data, or ask us to delete your data, we may have to suspend the provision of our products and services to you.

## 13. How to exercise your rights

In PTSB we have established a dedicated team to help you to exercise your rights under data protection law. You can contact this team directly:

- By post: Data Subject Rights, Permanent TSB plc, 56/59 St. Stephen's Green, Dublin 2, D02 H489
- Via Open24 Online Banking: Please click the "Do More" link in the navigation menu and then select "Manage my data"

You can also go to your local branch or call our telephone banking service on 0818 50 24 24.

In exercising your rights we will need to verify your identity to help ensure that no one else seeks to use your rights to access or interfere with your personal data

### **How to object to direct marketing**

- If, at any time, you wish to object to, or 'opt out' of, direct marketing, we will stop marketing to you if you write to us at FREEPOST F4940, Customer Data Quality (Direct Marketing), Permanent TSB plc, 56-59 St. Stephen's Green, Dublin 2, D02 H489, phone 0818 50 24 24 or +353 1 212 4101, or go to your local branch.

## **14. Contacts**

If you wish to exercise your data protection rights, please contact our Data Subject Rights team using the contact details set out in section 13 above.

If you have any queries about how we process your personal data, please contact our Data Protection Officer ('DPO'), by email at [dpo@ptsb.ie](mailto:dpo@ptsb.ie) or in writing to Data Protection Officer, Permanent TSB plc, 56-59 St. Stephen's Green, Dublin 2, D02 H489.

If you wish to make a complaint in relation to your data protection rights, please provide as much detail as you can regarding your complaint so that it can be effectively addressed. We would however caution you against including large amounts of personal data in an email, as email is an inherently insecure communication and may be viewed in transit by third parties.

You also have the right to make a complaint to the Data Protection Commission where you feel that your rights have not been appropriately served by us. You can contact the Data Protection Commission via: [dataprotection.ie/en/contact/how-contact-us](https://dataprotection.ie/en/contact/how-contact-us); or writing to Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963.

## 15. Changes to this Data Protection Notice

We will make changes to this notice from time to time, particularly when we change how we use your personal data and/or change our technology and products. Please visit our website [ptsb.ie/dataprotection/](https://ptsb.ie/dataprotection/) to view the most up-to-date version of this notice.

You can ask us for a hard copy of this notice either in branch, by calling 0818 50 24 24, or writing to Customer Services, Permanent TSB plc, 56-59 St. Stephen's Green, Dublin 2, D02 H489.

Permanent TSB plc trading as PTSB and PTSB Asset Finance is regulated by the Central Bank of Ireland.

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