

The Avant Money Privacy Notice

Data Privacy is important to us at Avant Money.
Please read this important document carefully.

This is the Privacy Notice of Bankinter, S.A. branch in Ireland (“Bankinter Ireland” or “Avant Money”). Bankinter S.A., trading as ‘Bankinter’ or ‘Avant Money’ is authorised by the Banco de España in Spain and is regulated by the Central Bank of Ireland for consumer protection rules. Bankinter S.A. has its registered office at Paseo de la Castellana, 29, 28046, Madrid, Spain, and Avant Money branch at Dublin Road, Carrick on Shannon, Co. Leitrim (CRO branch number 910258).

This Privacy Notice applies to all products underwritten by Avant Money including Avant Money mortgage, credit card and loan products and An Post Money credit card and loan products.

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1. Policies of other service providers

While you explore the services offered through the Avant Money and Bankinter S.A. hosted websites, Apps, and websites owned by other members of the Bankinter Group, please be alert for and review any specialised privacy notices and terms of use applicable to particular products, websites or Apps, or portions of them, as they may differ depending on the provider, product or service, on offer. Please be aware that if you were introduced to us by a broker, credit intermediary, other online retailers, partners, third-party internet sites, and third-party services accessible through the Avant Money website, they will have separate privacy and data collection policies and practices which are independent of and may differ from Avant Money's policies and practices. Avant Money is not responsible or liable for these independent policies and practices. It is your responsibility to review them and decide whether such policies and practices protect your rights to your satisfaction before proceeding.

If you ask us to share your information with or allow third-party providers access to your information, for example, Account Information Service Providers (AISPs), please ensure you review their privacy notices and terms of use.

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2. Your privacy is important to us

We are committed to providing you with products that are suitable to your needs and are backed by consistently top-quality service. We also take our obligations under data protection law very seriously. The Data Controller of your personal data is Bankinter, S.A. branch in Ireland ("Bankinter Ireland" or "Avant Money") with its registered office at Dublin Road, Carrick on Shannon, Co. Leitrim and CRO branch number 910258.

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3. Security

We will take measures to ensure that personal data will be processed in a manner that ensures appropriate security and confidentiality of the personal data, including for the prevention of unauthorised access to or use of personal data and the equipment used for the processing. We have appropriate technical and organisational measures to ensure an appropriate level of security, including:

- the pseudonymisation and encryption of personal data;

- verification of the identity of our customers through the use of personal passwords or other information before assisting them;
- the use of vigilant protection measures in order to protect our customers' accounts from fraudulent use;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

We ensure that anyone acting on our behalf that has access to personal data does not process the personal data except on instructions from us.

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4. What we collect and how long we will keep it for

The personal information that Avant Money, and credit intermediaries and/or third-parties appointed by us or acting on our behalf, collects about you may include the following:

Personal Information	Retention Period
Information in connection with your application for one of our products, which includes your name, address, date of birth, PPS number, employment details, email address, phone numbers, marital status, number of dependents, anti-money laundering documentation (e.g. copies of official identification and household bills), bank account details, income and expenditures, assets, debts, and credit history.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information gathered which may include your credit card details, any phone number you call us from, details of the financial transactions processed by us, our credit intermediaries or third-parties appointed by us.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.

Personal Information	Retention Period
Information gathered about you which may include electronic details about you, your computer or your internet protocol address.	Avant Money will retain this information for 12 months from the date the electronic details about you, your computer or your internet protocol address were gathered.
Information we gather about you through your interactions with us, credit intermediaries and third-parties appointed by us, which may include your debit card details.	Avant Money will normally retain your debit card details for 30 days following the completion of debit card transactions that you authorise us to complete; however, if a dispute arises, we may need to retain until such time as that dispute is resolved.
Information received from searches made in your name with credit reference and fraud prevention agencies.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information you provide about others or others provide us about you e.g. information provided as part of a joint application or concerning a jointly held bank account.	<p>Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.</p> <p>Please ensure that you share a copy of this Privacy Notice in advance of sharing information of another individual so as to ensure that individual understands how their personal data will be processed and retained in accordance with this Privacy Notice. Do not provide any personal information of another individual unless it is necessary and relevant to the application.</p> <p>If you share information on any other individual such as a joint applicant, additional cardholder or representative, Avant Money assumes that you share such information based on the permission of such third party and any such relevant information will be retained as part of your application for the above referred period.</p>
Information you may voluntarily provide in the onboarding process and/or during the execution of your relationship with us which includes special categories of personal data such as but not limited to	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.

Personal Information	Retention Period
Biometric data (fingerprints, facial and voice recognition) or health information.	
Information provided in situations where you are a beneficiary, guarantor, director or representative of one of our customers or where your circumstance has a material impact on our customers and their ability to abide by the terms and conditions of their credit agreement.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information about any and all applications underwritten by Avant Money or any and all accounts which you, or any member of your household, hold with or through us.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012.
Information received from anyone who is allowed to provide information about you.	Avant Money must retain these records for six years from the date on which we ceased to provide any product or service to you. This is aligned to the requirements of the Consumer Protection Code 2012
Information provided when registering for the Avant Money App (user ID and passwords).	Avant Money must retain this information for as long as you are a user of the Avant Money App.

You are not under a statutory or contractual duty to provide us with any personal information; however, the personal information requested from you is necessary to allow Avant Money to properly and appropriately provide or administer its products and services. If you do not provide us with sufficient information, we may be unable to provide such products or services to you.

Please DO NOT provide personal information relating to another individual in your application or in the documentation which you submit to support your application where it is not relevant and necessary to the consideration of your application. If you provide us with the personal information of an individual, for example, a joint applicant, additional cardholder or representative, you must ensure that the individual is informed and that they have given you permission to share their personal information. **You must also provide that individual with a copy of this Privacy Notice in advance of sharing their personal information with us and ensure that the individual understands that their personal information will be used as set out in said Privacy Notice.**

Your personal information will be stored by Avant Money on a computerised database and/or in any other secure manner. Any personal information which you provide when you apply for a product or hold an account underwritten by us will be used in accordance with the terms and conditions of the particular agreement which you have entered into with us and in accordance with the General Data Protection Regulation (2016/679) and the Data Protection Act 2018 (together “Data Protection Law”).

5. How we use Personal Information

Avant Money uses your personal information for the following purposes:

Purpose	Legal Basis
To assess any application for credit that you make to us directly or through a credit intermediary or third-party acting on our behalf. This includes applications for a mortgage, credit card, loan product or other such products which may be offered in the future.	This is necessary before we can enter into a contract with you and to fulfil our contractual obligations to you.
When you are completing an application for one of our products, we may need to contact you by phone (including your place of employment), SMS or email in relation to that application. We may also need to contact you by phone, SMS or email to administer any account that you hold with us.	This is necessary in order to take steps at your request prior to entering into a contract with you and for the performance of a contract to which you are party to. This may also be necessary, in some cases, to comply with Irish law. We also rely on your consent (if you have given it) to call you at your place of employment. You can withdraw this consent at any time online by going to the settings menu of My Avant Money or by contacting us.
When you are completing an application for one of our products, we may collect information to identify you through voice, facial or fingerprint (biometric data) recognition technology or request a third-party to complete this on our behalf.	We rely on your explicit consent to process biometric data. You can withdraw your consent at any time by emailing DPO@avantmoney.ie .
When you use the Avant Money app, we may send you notifications to keep you informed of your activity in the application.	We rely on your consent to send these push notifications. You can easily withdraw your consent at any time by disabling notifications in your mobile phone settings.
When you are completing an application for one of our products, we may use the services of an image recognition service provider to assist us with the extraction of data from the documents you provide.	This is necessary to achieve our legitimate commercial interest in operating our business efficiently and processing applications quicker.
To carry out searches (for anti-money laundering, credit history and legal purposes) and to disclose information to	This is necessary before we can enter into a contract with you, to fulfil our obligations once we have entered into a contract with

Purpose	Legal Basis
<p>credit reference agencies for the purpose of assessing applications for credit and credit related services and for on-going credit review.</p>	<p>you, and in some cases to comply with Irish law. This is also necessary to achieve our legitimate interest in promoting greater financial stability by supporting a full and accurate assessment of loan applications, aiding in the avoidance of over-indebtedness, assisting in lowering the cost of credit, complying with and supporting compliance with legal and regulatory requirements, enabling more consistent, faster decision-making in the provision of credit and assisting in fraud prevention.</p>
<p>To provide you with an open banking option as part of your credit application. Open banking is a secure way to give us access to your financial information through an AISP.</p>	<p>This is necessary to achieve our legitimate commercial interest in operating our business efficiently and processing applications quicker.</p>
<p>To generate a financial profile through categorisation of the data extracted from the financial information provided as part of your credit application.</p>	<p>This is necessary to achieve our legitimate commercial interest in operating our business efficiently and processing applications quicker.</p>
<p>To administer the services or products that we supply to you and administer and manage any accounts that have a co-borrower, including processing the co-borrower's personal data and disclosing your personal data to the co-borrower, if necessary, in relation to these accounts.</p>	<p>This is necessary to fulfil our contractual obligations to you.</p>
<p>To establish and confirm how you operate account(s) underwritten by Avant Money and to ensure compliance with any applicable terms and conditions. This includes where you become an Avant Money customer following the purchase by us of your card, loan and/or mortgage account from another financial service provider; we will need to process your personal information to allow us to plan and prepare for the proper transfer of your account from your previous financial services provider's systems to our systems.</p>	<p>This is necessary to fulfil our contractual obligations to you, and to achieve our legitimate commercial interest in operating our business efficiently.</p>
<p>To review and analyse your financial position with us and where required, complete a restructuring of your account with us. This may include requesting and</p>	<p>This is necessary to fulfil our contractual obligations to you in terms of any financial products you have with us and in making any decisions in respect of further requests</p>

Purpose	Legal Basis
processing additional personal data from you, e.g., details regarding your income and expenditure.	for products that you may make. This is also necessary to achieve our legitimate commercial interest in operating our business efficiently.
To provide your personal information to third-party processors and contractors who provide services to and for Avant Money, such as IT systems providers and professional services firms (e.g. brokers, mortgage services, auditors and external legal counsel).	This is necessary to fulfil our contractual obligations to you.
To provide your personal information to debt collection agencies who act on behalf of Avant Money.	Where it becomes necessary, this is to achieve our legitimate commercial interest in ensuring we are paid for our products and services in accordance with the contract we have agreed with you.
To prevent and detect fraud, or other unlawful activity and to trace those responsible.	This is necessary to fulfil our contractual obligations to you, and in some cases to comply with Irish law.
<p>To comply with any applicable laws and regulations, for example:</p> <ul style="list-style-type: none"> • To provide you with statutory and legal information and communications • To ensure we have up to date identification documentation on account opening and thereafter in order to prevent Money Laundering, Fraud and Terrorist Financing • To screen applications made to us to comply with international laws in order to prevent and combat terrorism and other criminal activities. • To improve and fix data quality and ensure accurate reporting to Irish and Spanish Credit Referencing Agencies (i.e. Central Credit Register or CCR and the Central Bank of Spain Risk Information or CIRBE). • To ensure identification of any representatives acting on your behalf • To provide reports and returns requested by regulatory bodies such 	This is necessary to comply with Irish or Spanish law.

Purpose	Legal Basis
<p>as the Central Banks of Ireland and Spain.</p> <ul style="list-style-type: none"> • To fulfil any court orders related to your account. • To monitor your use of our online services including My Avant Money, the Avant Money App or other services to prevent fraud • To assess your suitability and the affordability of a particular product as required under the Consumer Protection Code <p>To provide information to Revenue when requested.</p>	
<p>To carry out statistical analysis and market research to analyse, monitor and improve our business or to instruct a third-party to perform this on our behalf.</p>	<p>This is necessary to achieve our legitimate commercial interest in operating our business efficiently.</p>
<p>To evaluate whether there are other products that we offer suitable to your needs.</p>	<p>This is necessary to achieve our legitimate commercial interest in ensuring products offered are appropriate.</p>
<p>For direct marketing purposes so that we may inform you of our products or services.</p>	<p>For marketing through email, SMS, voice call (landline) and direct mail, we rely on our legitimate commercial interest in marketing similar products and services to you. For marketing through voice calls to your mobile phone, we rely on your consent. You can update your marketing preferences online by going to the settings menu of My Avant Money or by contacting us on marketing.preferences@avantmoney.ie.</p>
<p>To undertake research, testing, IT review and repairs and to process improvements to our services and IT platform.</p>	<p>This is necessary to achieve our legitimate commercial interest in operating the business efficiently.</p>
<p>To process payments to and from your Avant Money underwritten mortgage, credit card or loan accounts.</p>	<p>This is necessary to fulfil our contractual obligations to you.</p>
<p>To offer and operate loyalty and reward programmes either offered by us and/or that you have signed up to.</p>	<p>This is necessary to fulfil our contractual obligations to you.</p>
<p>To monitor and record telephone conversations to help us improve customer</p>	<p>This is necessary to achieve our legitimate commercial interest in operating our business efficiently.</p>

Purpose	Legal Basis
service and for quality and training purposes.	
Information you provide about others as part of your application (unless you provide information available in a publicly available database).	<p>In case information is provided as part of your application on another individual (e.g. in case of a joint application, multiple applicants in one application, etc.), the processing of such information is necessary before we can enter into a contract and to fulfil our contractual obligations to you and such other applicant.</p> <p>In case information is provided about another individual who is not an applicant (e.g. providing evidence of a joint account for a single application only), the processing of such information is necessary to achieve our legitimate interest of assessing the application in accordance with our terms, operating our business efficiently and processing applications quicker.</p>

Where we rely on our legitimate interests as the legal basis for processing, we will not process your personal data for these purposes if to do so would constitute an unwarranted interference with your own interests, rights and freedoms.

Interest-Based Advertising

Avant Money uses third-party ad-serving companies such as Google and Facebook to display interest-based advertising. Interest-based ads, also sometimes referred to as personalised ads or targeted ads, are displayed to you based on information gathered from your interaction with us or your interaction with the third-party websites and services.

We may use your personal data such as your email address, mobile phone number and other information collected in accordance with this Privacy Notice to provide an interest-based ad or offer to you on third-party websites or to ensure that you do not see advertising or offers from Avant Money that are not relevant to you. This is necessary to achieve our legitimate commercial interest in ensuring products offered are appropriate.

You can object to Avant Money’s interest-based advertising at any time and free of charge by emailing dpo@avantmoney.ie.

You can also find out more about how your personal data may be used in connection with advertising on the third-party websites and options for opting out through the individual privacy policies of each third-party. These privacy policies are available on their respective websites.

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6. International Transfers

Where Avant Money transfers personal information to third-parties for processing we ensure that we have an appropriate contract in place that protects your personal information and complies with our obligations under Data Protection Law. For transaction data, we transfer your transaction information to anywhere in the world where you make a financial transaction through a payment system using one of our products.

Where any person working for us is processing personal data on our behalf and that processing is outside of Europe, Avant Money will ensure that the processing is on the basis of either an adequacy decision by the European Commission or appropriate or suitable safeguards as required by Data Protection Law and that appropriate contracts are in place to confirm this.

A number of firms working for us avail of Binding Corporate Rules. Binding Corporate Rules or "BCRs" were developed by the European Union Article 29 Working Party (now the European Data Protection Board) to allow multinational corporations, international organizations, and groups of companies to make intra-organizational transfers of personal data across borders in compliance with Data Protection Law. A copy of these Binding Corporate Rules is available on request.

Mastercard and Visa International Transfers

Some of the processing of personal data by Mastercard and Visa may be located outside of Europe and where this is the case, Mastercard and Visa will ensure that processing is in line with Data Protection Law.

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7. Who we share Personal Information with

- Any person working for us for the purposes we have listed above in the "How we use Personal Information" section.
- If you arrange insurance through us, to the insurer.
- Any regulatory or statutory bodies, for example (but not limited to) the Central Bank of Ireland, the Data Protection Commission, the Financial Services and Pensions Ombudsman and the Central Bank of Spain.
- External consultancy firms e.g., legal, accountancy and audit and other professional services.
- Any organisation which backs any of our products which you hold.
- Any guarantor of any agreement between you and us.
- Any payment system under which we issue your card (i.e., Visa or Mastercard).
- Any person we transfer our rights or obligations to under any agreement we may have with you.
- Anyone you authorise us to give personal information to.
- Any merchant or third-party that we need to make enquiries with in relation to your account or that you have a disputed transaction with.

- Any credit intermediary, third-party or mortgage service provider and broker appointed by or payment services agent of Avant Money.
- Credit Reference Agencies E.g. Central Credit Register and the Central Bank of Spain Risk Information (CIRBE).
- Any partner providing benefits to you on your card purchase transactions.
- Any communications provider that acts on our behalf in relation to communications we may send to you.
- Any third-party we sell the whole or part of our business to.
- Any third-party, in accordance with the provisions of law, to meet our legal requirement or request, e.g., if we suspect criminal activity, we may share this with law enforcement agencies.
- Service providers to enable them to provide support to our business operations e.g. data quality and accuracy services; technology services; card, PIN, letters and statement producers and other printing services; anti money laundering sanctions list checking and compliance checks; account/card processing services and to store customer data, transaction and payment data.
- When you apply for a loan through the DoneDeal portal on the Avant Money website, we may share some personal data (your name, email address and mobile phone number) with the car dealership that you are purchasing a vehicle from.
- When you apply for a Green Home Improvement Loan, your Borrower Personal Data (name, address, email address and telephone number or any updated contact details) may be communicated to the Strategic Banking Corporation of Ireland (SBCI), and with the exception of the your telephone number, onward transferred to the European Investment Fund (EIF), the European Investment Bank (EIB) and/or any other Relevant Party, all acting as independent data controllers.

Link to the SBCI Data Protection statement is here:-

[Data Protection Notice- SBCI](#)

Link to the EIF Data Protection Statement Processing of Final Recipient's personal data is here:-

[final-recipients-monitoring-dataprotection.pdf \(eif.org\)](#)

Link to the EIB privacy statement is here:-

[Privacy statement for lending and other investment and advisory activities \(eib.org\)](#)

- Your Borrower Personal Data contained in the Home Energy Summary Report will also be communicated to the Sustainable Energy Authority of Ireland (SEAI) as well

as to the SBCI, acting as independent data controllers, including the details of the MPRN of the Relevant Property; Eircode and the dates that are 12 months prior to and 36 months after the date of the Borrower Transaction Offer Letter. Any Account Information Service Provider (AISP) that you have instructed to access your account information.

- Image recognition software providers who assist Avant Money with data extraction from scanned documents or image files provided by you as part of your credit application.
- Identity Service Provider who assists with the verification of identity documents.
- Data categorization services who will create a financial profile to assist Avant Money provide you with an accurate credit decision.

We will only share your personal data with the above parties where it is necessary to fulfil our contractual and legal obligations; in accordance with our legitimate interests or where required, we have consent to do so.

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8. Credit Reference Agencies

Central Credit Register (CCR).

Under the Credit Reporting Act 2013, Avant Money is required to provide personal and credit information for credit applications and credit agreements of €500 and above to the CCR. This information will be held on the CCR and may be used by other lenders when making decisions on your credit applications and credit agreements. We, along with other lenders, must transfer personal and credit information on a monthly basis to the CCR for loans, credit cards and mortgages.

As part of the Credit Reporting Act 2013, we are required to obtain and evidence an individual's PPSN when an application for credit is completed.

It is important to note that if you do not keep up your repayments on the mortgages, loans or credit cards underwritten by us, the missed payments will be reported to the CCR and will appear on your credit report. In addition, should you enter into a restructure arrangement with us arising out of financial difficulties; this restructure will be reported to the CCR.

You have the right to:

1. Request your credit report from the CCR at any time and the first credit report each year is free;
2. Insert a 200-word explanatory statement on your credit report;
3. Apply to have your information amended if you believe it is:
 - a. Inaccurate;
 - b. Incomplete; or
 - c. Out of date; and

4. Make a report to the CCR if you reasonably believe that someone has, is, or is about to impersonate you.

For more information about the Central Credit Register

- Website: www.centralcreditregister.ie
- Email: consumerinfo@centralcreditregister.ie
- Landline: 01 224 5500

Central Bank of Spain Risk Information (CIRBE).

To comply with Chapter VI of the Spanish Law 44/2002, which entered into force on the 24 November, on Measures to Reform the Financial System, Avant Money is required to provide the data necessary to identify the persons with whom credit risks are held, directly or indirectly, as well as the characteristics of those persons and risks, including, in particular, those affecting the amount and recoverability of those risks. This obligation extends to risks held through special purpose vehicle entities and to those that have been transferred to third parties, while the entity retains its management.

The data referred to in the previous paragraph shall include those that reflect a situation of non-compliance and all data declared to the CIRBE by Avant Money must be accurate and updated, so that they truthfully respond to the current situation of the risks and their holders on the date of the declaration.

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9. Mastercard

As part of the agreement between Avant Money and Mastercard, Mastercard will process your personal data in line with section 3.10 of the Mastercard rules which you can find at <https://www.mastercard.us/en-us/about-mastercard/what-we-do/rules.html>, including for internal research, fraud, security and risk management purposes. Some of this processing will be located outside of Europe and where this is the case, Mastercard will ensure that processing is in line with Data Protection Law.

The Mastercard Binding Corporate Rules have been approved by the EEA data protection authorities and you have the right to enforce these rules as a third-party beneficiary. The Mastercard Binding Corporate Rules can be viewed at <https://www.mastercard.us/content/dam/mccom/en-us/documents/mastercard-bcrs-february-2017.pdf>.

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10. Automated Decision Making and Profiling

Lending Decisions

When you apply for one of our products or if you request a credit limit increase for your existing credit card product, we may use an automated decision-making system to process the personal information that you provide and the personal information that we are allowed to collect from others. These automated decisions can affect the products and services we may offer you now or in the future or the price that we charge you for them. These automated decisions can also affect whether or not we will approve your request for a credit limit increase. This automated decision-making system can lead to quicker decisions which are more appropriate and consistent.

For credit applications and credit limit increase requests, the system analyses your personal information, your credit score from the credit reference agencies, your financial history and whether you meet our minimum credit requirements. If the system finds that you do not meet our minimum credit requirements, we may not approve your application or request. In assessing your application or request, the automated decision-making system will look at various pieces of information to assess your Stability, Ability and Willingness (as defined below) to pay. This assists in making fair and responsible lending decisions.

- “Stability” – How stable is your situation in relation to time in employment and residential status. This is assessed by looking at employment, residential status etc.
- “Ability” - Can you afford the payments based on the income and expenditure information provided or other outstanding debts you hold etc.
- “Willingness” – How reliable and responsible are you in relation to your other bills and paying other debt?

If requested, we shall manually assess your application or request. As part of this assessment, one of our credit underwriters will review the decision made by the automated decision-making system and the data created and considered as part of the automated decision-making.

In addition, when you apply for one of our products and while you are a customer of Avant Money, we will use automated tools to review the personal information you provide or that we are allowed to collect from others to evaluate and tailor other products or services that may be suitable to your needs. We will only contact you in relation to these offers if you have agreed to this contact. You have the right to object to this profiling or appeal a decision at any time by contacting DPO@avantmoney.ie.

Financial Behaviour Decisions

We will use technology to help us analyse and assess the information we collect through your use of our products and services e.g. credit limit, balance, payments, spends and interest charged. This helps us evaluate and understand your financial behaviour and assists us to tailor the most appropriate action in relation to your account.

You have the right to object to this type of profiling at any time by contacting DPO@avantmoney.ie.

We regularly test our profiling and automated decision-making tool to ensure that the decisions made through it are fair, effective and unbiased.

If you believe that the results of any automated decision-making are incorrect, you can appeal the results by contacting:

- For Avant Money credit card and loan accounts - 0818 409 511
- For An Post Money credit card and loan accounts – 0818 205 410

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11. Your Rights

Under the applicable Data Protection Law, you have the following rights:

- **Access, Rectification or Erasure:** You have the right of access to personal information we hold about you in our records. You are also entitled to have your personal data corrected if it is inaccurate or erased if we do not have a legitimate reason for retaining your data.
- **To be Informed:** you have the right to be informed how your personal information is being processed.
- **To Restrict Processing:** you have the right to restrict the processing of your personal information where you are contesting the accuracy of that information, you have objected to processing (as described below), or where the processing is unlawful.
- **To Object:** where your personal information is being processed based solely on our legitimate interests ([see section 5](#)), you have the right to object to that processing.
- **To Data Portability:** for personal information which you have provided to a controller, where processing was based on your consent or for the performance of our contract with you or where processing is done by automated means, you have the right to be able to move your data from one IT system to another in a safe and secure way.
- **To Withdraw Consent:** if Avant Money are processing personal data based on your consent, you may withdraw that consent at any time.

If you wish to exercise any of your data rights or have any concerns about how we process your personal data, please contact our Data Protection Officer at the details below.

By email - DPO@avantmoney.ie

In writing - Data Protection Officer, Avant Money, Dublin Road, Carrick-on-Shannon, Co Leitrim, N41 V328.

You can also contact the Office of the Data Protection Commission using the below details:

Visit their website www.dataprotection.ie.

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12. Sale of the Avant Money Business

We may disclose your personal information to potential direct or indirect acquirers of Avant Money, or of any part of our business, as part of a due diligence process including for testing purposes in preparation for migration. Where we make such disclosures, we will do so subject to strict confidentiality agreements and security arrangements. Where there is a transfer of our business, or any part of it, to a third-party, we may transfer your personal information to that third-party in order to allow them to continue to provide services to you.

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13. Telephone Calls

We record inbound and outbound telephone calls for quality assurance and training purposes.

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14. Corporate and Commercial Lending

When we provide credit facilities to businesses, partnerships, or other corporate / small and medium sized enterprises (“SME’s”), we process personal data relating to individuals associated with those entities, such as directors, beneficial owners, guarantors, and authorised representatives.

What Personal Data We Process

We may collect and process:

- Identification and contact details (e.g. name, address, PPS number, date of birth, nationality, contact information, role)
- Verification documents (e.g. passport, utility bills, tax IDs) for AML, CTF, and KYC checks
- Corporate and financial information (e.g. ownership structure, shareholding, financial connections)
- Screening data (e.g. sanctions, adverse media, internal risk classifications)

Who Processes Your Data

We engage a third-party loan administration provider to carry out AML, KYC, and onboarding activities on our behalf. Acting as a data processor under Article 28 GDPR, they

process personal data strictly in accordance with our documented instructions and security requirements. Their services include verifying documentation, calculating AML risk scores, and conducting ongoing screening.

How We Use Personal Data

Purpose	Legal Basis
To assess and manage the corporate / SME lending facilities and the ongoing relationship, including onboarding, servicing, and due diligence.	This is necessary for the performance of a contract to which the corporate / SME entity is party, or in order to take steps at the entity's request prior to entering into a contract (Article 6(1)(b) GDPR – contractual necessity).
To comply with legal and regulatory obligations, including anti-money laundering (AML) checks, counter-terrorist financing requirements, and mandatory regulatory reporting (e.g., to the Central Credit Register or CIRBE)	This is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(c) GDPR – legal obligation).
To protect our legitimate commercial interests, such as managing credit and operational risk, undertaking internal risk scoring, fraud prevention, debt collection, and establishing, exercising, or defending legal claims.	This is necessary for the purposes of the legitimate interests pursued by us or by a third party (Article 6(1)(f) GDPR – legitimate interests).

How Long We Keep Your Data

Data is retained in line with regulatory obligations and the retention periods in Section 4 of this Privacy Notice.

Who We Share Your Data With

We may share data with service providers, regulators, and other entities as outlined in Section 7.

International Transfers

Where data is transferred outside the EEA, we apply safeguards such as Standard Contractual Clauses or adequacy decisions. See Section 6 for details.

Your Rights

You have rights under Articles 12–22 GDPR, including access, rectification, objection, and erasure. See Section 11 for more information.

15. Changes to our Privacy Notice

We may change this Privacy Notice from time to time and to ensure we continue to follow best practice when it comes to your privacy. When such a change is made, we will post a revised version on this website. Changes will be effective when they are posted. It is your responsibility to review this Privacy Notice from time to time to be aware of any such change. Your continued use of the service will indicate your agreement to any such change. This Privacy Notice was last updated in January 2026.

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16. Tell us what you think

Avant Money welcomes your question and comments about privacy, and you can do so by writing to the Data Protection Officer, Avant Money, Dublin Road, Carrick-on-Shannon, Co Leitrim.

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You can access information in relation to our Cookies policy [here](#)

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