

DATA PROTECTION PRIVACY POLICY

Introduction

The Insurance Shop Ltd is committed to protecting and respecting your privacy. We comply with our obligations under the General Data Protection Regulation and Data Protection Acts 1998 to 2018.

This Privacy Notice tells you how we use your information and confirms that the Data Controller responsible for your information is The Insurance Shop Ltd.

Purpose for collecting and processing your data

As an Insurance Intermediary, the personal data we collect from you is passed on to an insurance company in order to obtain a premium and provide you with a quotation in relation to a service you have requested, arrange a transaction on your behalf, administer, manage your policy, provide premium renewal details and assist with claims as part of our service. We may also collect your personal data to verify your identity or to compile and process your information for audit, statistical or research purposes, for compliance with regulatory and legal requirements, for internal record keeping and to protect your vital interests. We may also process your personal data where we have a legitimate interest to do so, subject to those interests not over-riding your fundamental rights and freedoms. This includes: market research and statistical analysis to improve our services and products, to protect our business, reputation, resources and equipment, manage network and information security and prevent and detect fraud, dishonesty and other crimes, investigating complaints, training and monitoring staff.

The personal data we require about you (and, if applicable, other people insured or named under your policy of insurance) will be gathered and stored safely as set out below. Where personal data is provided to a third party to us, you confirm that you have explained to them that you have provided their personal data to us and that we will process such data in accordance with and for the purposes outlined below.

Personal Information we collect

Your Data: The personal information we collect and use may include your name, address, telephone number and/or email address, date of birth or age, occupation, other products you have purchased from us, insurance requirements including details about your home or vehicle, claims history, employer details (where necessary) driver licence details, bank account details or payment card details, marital status, unspent criminal convictions and for motor insurance, penalty points, Road Traffic offences.

Other people's data: As well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy.

Note: If you are providing information about another person we expect you to show them this data protection privacy notice and ensure that they have given you permission to provide this

information to us so that we can provide a quote. If they have any concerns, please ask them to contact us in one of the ways described in the 'Contacting Us' section.

Claims data: If a claim is made we may also collect personal information about the claim from you and any relevant third parties.

Note: You don't have to provide us with any personal information, but if you don't provide the information we need we may not be able to proceed with your application or any claim you make. We will let you know what information is required to proceed with your application or any claim you make.

Health data: We may need to ask for details relating to your health data or the health data of somebody else covered under your policy.

Criminal conviction data: We may ask for details relating to any unspent criminal convictions you and anybody else covered under your policy may have.

We recognise that information about health data and criminal convictions is particularly sensitive information. We will only collect and use such data as follows:

Criminal conviction data is used for the purposes of providing quotes and underwriting, processing any claims you may have, fraud investigation and handling any complaints you may have.

Health data is used for the purposes of providing quotes and underwriting, processing any claims you may have, fraud investigation and handling any complaints you may have.

We may also need to use your health and/or criminal data for the purposes of establishing, exercising or defending legal rights, including in connection with advice, claims, or proceedings, and where authorised by law.

Note: Some personal data is mandatory in order for the performance of the contract. In the event you decide not to provide the mandatory personal data we will be unable to provide you with a certain service or product. We will indicate to you where any personal data required is mandatory or optional.

Why we are processing your data? Our Legal Basis

In order for The Insurance Shop Ltd to provide you with any of the insurance services listed above, The Insurance Shop Ltd needs to collect personal data to be able to provide a quotation, arrange a transaction on your behalf, administer, manage your policy and assist with claims as part of our service.

Our reason (lawful reason) for processing your data under the EU's General Data Protection Regulation (GDPR) is:

Legal basis – The Insurance Shop Ltd needs to collect and process your data on the basis that it is necessary to do so to enter into and/or to perform a contract with you.

We are committed to ensuring that the information we collect and you give us is appropriate for this purpose and does not constitute an invasion of your privacy.

The Insurance Shop Ltd will process (collect, store and use) the information you provide in a manner compatible with EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary.

Special Categories of Personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data), we will ensure the below:

We will obtain your explicit consent

We may collect and use your information for the purposes set out below:

1. To provide a quote, including making a decision as to whether we can provide you with cover and at what price.
2. To verify your identity.
3. To provide you with insurance cover and administer your insurance policy, including dealing with any queries or changes, payments, renewals and processing a cancellation of your policy.
4. To validate, investigate and/or process any claims you or another person makes in relation to your insurance policy.
5. For management information purposes including portfolio assessment, risk assessment, performance reporting and management reporting.
6. For a proposed portfolio transfer, reorganisation, transfer, disposal or other transaction relating to our business.
7. To detect and prevent fraud.
8. To comply with laws and regulation.

How we share your information with others

We may share your personal information with:

Third parties who provide services to us, and insurers (either directly or via those acting for the insurer such as loss adjusters or investigators) to help us administer our products and services;

With regulatory bodies and law enforcement bodies, including the Gardai, e.g. if we are

to comply with a relevant legal or regulatory obligation;

The Insurance Shop Ltd may disclose information it has collected about you, in the course of transacting business, if required to do so by law or when necessary to protect the rights of The Insurance Shop Ltd or its employees.

How we share your personal information with others for fraud prevention:

The data you provide may be used by us and shared with insurers as well as certain Statutory and other authorised bodies for anti-fraud purposes including:

Sharing information about you with insurers (including where you are purchasing a motor insurance policy, for the purposes of validating any No Claims Discount) and public bodies including the Department of Transport, Tourism and Sport, the Department of Finance and the Gardai.

Managing your accounts and/or insurance policies.

Data Security:

The Insurance Shop Ltd's intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect online, including the use of encryption when collecting or transferring sensitive data such as credit card information. However, you should always take into consideration that the internet is an open forum and that data may flow across networks with little or no security measures, and therefore such information may be accessed by people other than those you intended to access it.

We have issued all our third party processors with a Data Processor checklist asking them GDPR specific questions.

If we transfer personal data to a third party outside the EU we, as the data controller, will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available.

Data Subject Rights:

The Insurance Shop Ltd facilitates you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

Your rights as a data subject:

Right of access – you have the right to request a copy of the information that we hold about you.

Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

Right of portability – you have the right to have the data we hold about you transferred to another organisation.

Right to object – you have the right to object to certain types of processing such as direct marketing.

Right to object - to automated processing, including profiling.

Right to judicial review – in the event that The Insurance Shop Ltd refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data.

Additional information we are providing you with to ensure we are transparent and fair with our processing.

Retention of your personal data:

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. The Insurance Shop Ltd will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body The Central Bank and our internal governance.

Complaints:

In the event that you wish to make a complaint about how your personal data is being processed by The Insurance Shop Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and The Insurance Shop Ltd's data protection representatives Data Protection Officer, GDPR owner.

Failure to provide further information:

If we are collecting your data for a contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

Profiling for market purposes

When we seek to contact you about other services, as outlined above, we may run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

Additional Processing:

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

Contact Us:

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 01 8366663 or info@tis.ie

Privacy policy statement changes:

The Insurance Shop Ltd may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you are aware of any changes. By using our services you agree to this privacy policy.

This privacy policy was last reviewed in May 2018.