

Pat Treacy Insurance Brokers Limited

Regulated by the Central Bank of Ireland.

Privacy Statement

Introduction

Pat Treacy Insurance Brokers Limited is committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the General Data Protection Regulation (GDPR) in relation to, not only processing your data, but ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of our Company in relation to the information we collect about you.

For the purposes of the GDPR the Data Controller is our Managing Director, Pat Treacy to whom all queries should be directed at our office in 261 Crumlin Road, Dublin 12.

Please read this Statement carefully as this sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Pat Treacy Insurance Brokers Limited is regulated by the Central Bank of Ireland as an Insurance Intermediary registered under the European Communities (Insurance Mediation) Regulations, 2005 and as an Investment Intermediary authorised under the Investment Intermediaries Act, 1995.

In order for us to provide you with the appropriate financial product or service we need to collect personal data from you for this product/ service. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – Pat Treacy Insurance Brokers Ltd. needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract.

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

How will Pat Treacy Insurance Brokers Ltd. use the personal data it collects about you?

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

Special Categories of personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data) – we will ensure that we obtain your explicit consent.

Who are we sharing your data with?

In order to carry out a fair analysis of the market we will share your data/information only with appropriate service providers e.g. Insurance Companies, in order to seek the most suitable and appropriate product or service that you are seeking.

We can provide a list of these service providers, all of whom are accountable with the GDPR.

Retention of your personal data

Data, which will be held on paper file and/or Computer Data Base, will not be held for longer than is necessary for the purpose(s) for which they were obtained. We maintain a contract with the Computer Data Processor which covers liabilities and responsibilities under GDPR. We 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.

Failure to provide further information

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

Profiling – automatic decision making

Risk Profiling

To establish a customer's attitude to investment risk (relates to pensions and investments) we may use automated calculators which calculate the customer's attitude to various levels of risk, having answered a series of questions.

Providing quotations for financial services products.

To determine quotations for Life Cover it will be necessary to supply age & smoker/non smoker information in order to obtain best quote.

We will explain these processes to you should we see the need to utilise either of these options for you.

Additional Processing of Personal Data

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 and obtain your specific consent.

CCTV

Pat Treacy Insurances Limited wishes to bring to the attention of our clients and others using our public office that, for security purposes, we have installed CCTV on our premises.

The cameras are focussed on a number of locations including the public office, the rear entrance and the shared adjacent corridor.

As mentioned this is purely for security purposes and should you have any misgivings about conducting your business in the public office we have the option of dealing with you in one of our private offices within the main office building in which there are no cameras.

The images recorded on these cameras are kept for a maximum of fourteen days and are destroyed completely within that time frame

Data Subjects Rights;

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review:** in the event that Victor O'Rourke Insurances Limited 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.

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us.

Complaints;

If you have a complaint about the use of your personal information, please let a member of staff know, giving them the opportunity to correct things as quickly as possible. If you wish to make a complaint you may do so in writing and by email. Please be assured that all complaints received will be fully investigated. We ask that you supply as much information as possible to help our staff resolve your complaint quickly. You may also contact the Data Protection Commission in Ireland to lodge a complaint (details of both below).

Data Protection Commission
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Station Road
Portarlinton
Co. Laois, R32 AP23
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Fax: + 353 57 868 4757
Web: www.dataprotection.ie
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