

2018 Data Protection – Privacy Statement - Customers

Introduction

Patrick Quinlan, Insurance Broking Practice, 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 Regulations (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 Patrick Quinlan in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Patrick Quinlan
- Contact detail is - Patrick@pqi.ie
- When we refer to 'we' it is Patrick Quinlan

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.

Who are we?

We are a General Insurance Brokers who are committed to working diligently on behalf of our customers to provide the best service and cover to suit our customers individual insurance requirements.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Name – Patrick Quinlan
- Email address – Patrick@pqi.ie
- Phone number – 01-8829044 or 087-0611931

Purpose for processing your data

We collect and use information for a number of reasons, including:

Underwriting of the Risks proposed

For submission to Third Parties for the purpose of obtaining insurance quotations

The administration of policies at inception, mid-term, renewal and throughout the term of the policy to provide assessment or assistance or processing of any claims

to comply with legislation & regulatory matters governing Insurance Brokers

Internal reporting and statistical purposes

Why we are processing your data? Our legal basis.

In order for us to provide you with our Services (i.e. General Insurance Broking) Patrick Quinlan needs to collect personal data for *your insurance requirements*. Our reason (lawful reason) for processing your data under the GDPR is:

Legal basis – We need to process your data as this is necessary in relation to any contract of insurance (policy) which you, as an individual, want us to enter into on your behalf or process any subsequent change to your policy that you request or renew your policy.

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 Patrick Quinlan use the personal data it collects about me?

Patrick Quinlan will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulations (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 (Sensitive 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

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Patrick Quinlan in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide us on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with their GDPR procedures.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

The third parties that we pass your personal data to are our agents, advisors, service providers and contractors such as:-

- Persons acting on the customer's behalf, eg Insurance Company, Loss Adjusters and/or Assessors, Solicitors and Executors**
- Persons acting on the insurers behalf eg Loss Adjusters, External Investigators, Medical Practitioners & Solicitors**
- Insurance Companies, Managed General Agents and/or Underwriting Agencies and Third Party Underwriters whom we may request and obtain quotations from**
- Re-insurers**
- Loss Adjusters, Repairers and other Claims handling Agents**
- Personal Advisors & Consultants eg Surveyors for the purpose of surveying a risk**
- Entities to verify personal data**
- Financial Organisations**
- The Financial Services Ombudsman, The Central Bank of Ireland, the Financial Conduct Authority or any equivalent foreign supervisory body.**
- Meeting Patrick Quinlan, Insurance Broking Practice, legal and compliance obligations (which include those relating to the prevention of money laundering, financing of terrorism and fraud); and**
- Quality control and Group reporting and management.**

We will endeavour to ensure all our third party processors comply with and meet their obligations under the **General Data Protection Regulations**.

If we transfer personal data to a third party or 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 Subjects Rights:

We facilitate 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

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 we 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. We will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body the Central Bank of Ireland and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Patrick Quinlan or how your complaint has been handled, you have the right to lodge a complaint directly with the Data Protection Supervisory Authority and our data protection representative Patrick Quinlan.

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 – automatic decision making

We do not use this currently.

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 to you 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 01-8829044 or Patrick@pqj.ie

Privacy policy statement changes

Patrick Quinlan 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're aware of any changes. By using our services you agree to this privacy policy.

Date: 25th May 2018
