

Data Privacy Notice/Statement

Introduction

D'Arcy Cleary Insurances 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 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 D'Arcy Cleary Insurances in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- D'Arcy Cleary Insurances
- 46 Kenyon Street, Nenagh, Co. Tipperary (067-32044)
- When we refer to 'we' it is D'Arcy Cleary Insurances

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?

- D'Arcy Cleary Insurances is a General and Life insurance broker.

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

- Alan D'Arcy
- alan.darcy@darcyinsurance.ie
- 067-32044

Purpose for processing your data

Personal identification information

We may collect personal identification information from you in a variety of ways, including, but not limited to, when Users visit our site, fill out a form, and in connection with other activities, services, features or resources we make available on our Site. Users may visit our Site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

Non-personal identification information

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers' utilised and other similar information.

This privacy policy was last reviewed in May 2018

Web browser cookies

Our Site may use “cookies” to enhance User experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the Site may not function properly.

How we use collected information

D’Arcy Cleary Insurances may collect and use Users personal information for the following purposes:

- To run a promotion, contest, survey or other Site feature
- To send Users information they agreed to receive about topics we think will be of interest to them.
- To send periodic emails.

We may use the email address to respond to their inquiries, questions, and/or other requests. If User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc. If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or User may contact us via our Site.

Why we are processing your data? Our legal basis.

In order for us to provide you with information, products and services D’Arcy Cleary Insurances need to collect personal data for our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – D’Arcy Cleary Insurances 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, D’Arcy Cleary Insurances 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 D’Arcy Cleary Insurances use the personal data it collects about me?

D’Arcy Cleary Insurances 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 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 D'Arcy Cleary Insurances 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 fulfill the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our 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.

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:

D'Arcy Cleary Insurances 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 D'Arcy Cleary Insurances 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. D’Arcy Cleary Insurances 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 D’Arcy Cleary Insurances or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and D’Arcy Cleary Insurances data protection representatives Data Protection Officer.

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 use your Customer Data for the provision and administration of insurance products and related services. Examples of the actual or possible uses of your Customer Data are: processing your insurance application, processing claims, statistical analysis, underwriting purposes, fraud prevention, market research, risk management and the provision of advice. This gathering of information is consistent with our offline work practices.

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 (067) 32044 or email info@darcyinsurance.ie

Privacy policy statement changes

D’Arcy Cleary Insurances 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.

This privacy policy was last reviewed in May 2018