



## DATA PRIVACY NOTICE

Priority Insurance & Finance Solutions is committed to respecting and protecting your privacy. We wish to be transparent in 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 our client. Our principle business is to provide advice and arrange transactions on behalf of clients in relation to Life, Pensions, Investments and Deposits, Mortgages and General Insurance products. We provide our services from the selection of products provided by the Companies we have agencies with. We recommend the product that, in our professional opinion is best suited to you. In providing this service to you we will need to obtain personal information from you. The following outlines how we deal with this information and how it is used. Any questions or concerns you have can be addressed to us directly by email: [info@pifs.ie](mailto:info@pifs.ie).

This Privacy Notice sets out the basis on which we gather, use, process and disclose any Personal Data we collect about you, or that you provide to us.

This Privacy Notice applies to you, whether you are a current, past, or prospective customer. It also applies to third parties whose Data you provide to us in connection with our relationship with you (for example, the names of relatives). Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to us.

### Who controls your Personal Data?

We control your Personal Data to allow us to give you advice and recommendations on your financial affairs. Your data is then passed on to the relevant company/companies we have agencies with by way of application forms, by post, email or online, through their secure websites.

### Data we may collect about You

In order for us to give you a recommendation and information on financial products, we need to collect and process personal information about you. If you do not provide the information we need, we may not be able to offer you advice or provide our services to you. The types of personal data that are processed may include:

- Individual details - Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you.
- Financial detail - full details on any debts, loans, assets you may own.
- Identification details - Identification numbers issued by government bodies or agencies, including your PPS Number, passport number, tax identification number.
- Claims information - information you give us with regards claims you notify us about or ask for help on.

- Policy Information - Information about the quotes you receive and policies you take out.

### Special Categories of Personal Data

- Health information which has additional protection under Data Protection Law. We do not process health information other than hold the information on application forms you have filled in. The Insurers process and control your health data to allow them to underwrite your policy or decline cover. They may have further information they have obtained with your approval from your doctor, but we are not privy to this information.

**Where do we collect your Personal Data from?** We may collect your personal data from various sources, including;

- You,
- Your employer or their representative,
- Life Companies we have agencies with,
- Any other contracts of insurance you may have with us or when you sought a quote from us for insurance policy under our agencies.
- We will need a letter of authorisation from you to allow us contact other companies on your behalf.
- When you visit our website and input a request for us to contact you.

Which of the above sources apply will depend on your circumstances and the product or service you are interested in or that your enquiry relates to. You are not obliged to provide us with your personal information. However, if you do not, we might not be able to carry out the services you have requested of us.

### Why are we processing your data?

We are processing your data

- To give you information on and provide you with recommended financial products.
- To disclose data to policyholders, life assured, beneficiary, trustee, assignee, successors, group company or to other parties.
- To comply with legal and regulatory requirements including Anti-Money Laundering regulations.
- To understand how people interact with our websites (if applicable).
- To carry out and determine the effectiveness of advertising, and of marketing campaigns.

### Legal basis for processing your information

We will only use your Personal Data for lawful reasons. These are:

- a) The use is necessary for the performance of a contract to which you are a party to or to take steps at your request prior to entering a contract (such as providing a recommendation).
- b) The use is necessary to comply with our legal obligations. You have consented to us using your information in such a way.



- c) The use is necessary for our legitimate interests.
- d) The use is necessary for the performance of a task carried out in the public interest, such as assisting a regulatory authority's investigation of a criminal offence

#### **Who we share your Data with?**

In order to provide our services and to comply with legal obligations imposed on us, we may share your information with:

- Pension Trustees, beneficiaries of pensions & other financial products, relatives & guardians, (in certain circumstances and within the law)
- Insurance and Assurance companies, Stockbrokers, Investment companies we have agencies with
- Employers - past, present, and prospective
- Legal, financial, investment, medical, & other professional advisors in the process of submitting your application on the various products/services we offer
- Third party service providers (e.g. IT, Cloud and Payment service providers)
- Database/ CRM system provider - all data encrypted
- Lenders
- Businesses that refer your business to us
- Regulators and law enforcement agencies (if there is a legal reason to share your data with them) i.e. Central Bank of Ireland, The Pensions Authority, Financial Services & Pensions Ombudsman, Data Protection Commissioners, Revenue Commissioners (pensions & dirt tax)

#### **Privacy Notice amendments as per Section 21(3) of the Consumer Insurance Contracts Act 2019**

If you hold insurance against a liability that may be incurred by you against a third party, where for whatever reason you cannot be found or you become insolvent, or the court finds it just and equitable to so order, then your rights under the contract will be transferred to and vest in the third party even though they are not a party to the contract of insurance.

The third party has a right to recover from the insurer the amount of any loss suffered by them.

Where the third party reasonably believes that you as policyholder have incurred a liability the third party will be entitled to seek and obtain information from the insurer or from any other person who is able to provide it concerning:

- the existence of the insurance contract,
- who the insurer is,
- the terms of the contract, and
- whether the insurer has informed the insured person that the insurer intends to refuse liability under the contract.

#### **How long do we keep Your Information?**

When providing products to you it may be necessary to retain your information for an extended period of

time.

We keep your information for as long as required by law for the purpose that you gave it to us for. As a general rule for legal and best practice reasons we are required to keep your information for 6 years after the date on which our relationship with you ends.

#### **Your Rights**

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- the right to access your personal data - you can request a copy of the information we hold about you
- the right to request the rectification and/or erasure of your personal data if it is inaccurate or incomplete
- the right to restrict the use of your personal data, where certain circumstances apply the right to object to the processing of your personal data – you can object to certain types of processing e.g. direct marketing
- the right to receive your personal data, which you provided to us, in a structured, commonly used, and machine-readable format or to require us to transmit that data to another controller.

#### **Automated/Profiling Decision Making**

Where we use automated decision-making, you will always be informed & you will be entitled to have a person review the decision so that you can contest it and put your point of view and circumstances forward. E.g. When we produce quotes for the business you are contacting us about or when we want to market our products and services to you we may run a program which allows us to identify certain criteria of clients (all those with that fit within a certain criterion for example).

#### **Complaints**

If you are dissatisfied about the way we handle your Personal Data, please contact us. We will do our best to address your concerns swiftly and resolve any issues you have. You have the right to complain to the Office of The Data Protection Commission, Canal House, Station Road, Portllington, Co. Laois, R32 AP23. www.dataprotection.ie Tel.: +353 (0)761 104 800. Fax: +353 57 868 4757. E-Mail: info@dataprotection.ie