

Privacy Notice

Introduction

Fidentia Insurance Brokers (Ireland) DAC 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 Fidentia Insurance Brokers (Ireland) DAC in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Fidentia Insurance Brokers (Ireland) DAC
- Contact details: info@fidentiains.com
- When we refer to 'we' it is Fidentia Insurance Brokers (Ireland) DAC

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?

- *Fidentia Insurance Brokers (Ireland) DAC is a wholly owned subsidiary of Fidentia Insurance Brokers Limited, a UK registered company that provides insurance mediation services both in the UK and internationally. We provide both wholesale and retail insurance mediation services in Ireland and across the EEA, covering both personal lines and commercial lines business.*

Our GDPR Owner and data protection representatives can be contacted directly here:

- Name: Joe Knoblauch
- Email address: info@fidentiains.com
- Phone number: 00 44 203 150 0080

Purpose for processing your data

There are a number of reasons for gathering information about you. For instance, we need to know how to get in touch with you, we need to be certain of your identity and we need to understand your financial circumstances, so we can offer you products and services and give you the best possible customer experience. The information we collect falls into various categories.

Why we are processing your data? Our legal basis.

In order to provide you with our services it is necessary for us to collect and process your personal data. We are required, therefore, to inform you of the legal bases for processing your personal data. One such legal basis is that the processing is necessary for the performance of the advisory services contract (and

any other contract) that we commit to delivering to you from time to time. Another legal basis is that some processing is necessary for the purposes of the legitimate interest that we have, as a firm that is authorised and regulated by the Central Bank of Ireland, in the proper administration and correct operation of our firm. There may also be circumstances where the legal basis for processing your personal data is consent (where we have sought it and it has been provided to us), in which case that consent may be withdrawn at any time.

In any event, Fidentia Insurance Brokers (Ireland) DAC 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 Fidentia Insurance Brokers (Ireland) DAC use the personal data it collects about me?

Fidentia Insurance Brokers (Ireland) DAC 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 endeavor 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 Fidentia Insurance Brokers (Ireland) DAC 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 Fidentia Insurance Brokers (Ireland) DAC 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 include:

- Your authorised representatives including your attorney (under a Power of Attorney) and any other party authorised by you to receive your personal data.
- Third parties we need to share your information with in order to facilitate payments you have requested (for example, SWIFT, credit card issuers and merchant banks) and those you ask us to share your information with.
- When you apply to us for insurance.
- Insurers and reinsurers.
- We may request information relating to your health for underwriting and claims administration purposes.
- If you make a claim, any information you give us, or to the insurer, may be put onto a register of claims and shared with other parties to prevent fraudulent claims. A list of the participants is available from the insurer.

- Within our Group of companies, to our agents and other insurers and third parties for administration, regulatory, customer care and service purposes, and to investigate or prevent fraud.
- When you use a joint product.
- If you open or hold a joint account or product, this may mean that your personal data will be shared with the other applicant. For example, transactions made by you will be seen by your joint account holder, and you will see their transactions.
- Guarantors.
- Any person or entity which guarantees your obligations to us (for example, if a parent guarantees your mortgage or an entity provides a guarantee as part of a statutory scheme) or gives us an indemnity concerning these obligations.
- Companies that provide support services for the purposes of protecting our legitimate interests.
- Our service providers can include marketing and market research companies, analytics companies, investment companies, IT and telecommunication service providers, software development contractors, data processors, debit/credit card producers, computer maintenance contractors, printing companies, property contractors, document storage and destruction companies, custodians and providers of administration services, archiving services suppliers, debt collection agencies, budgeting and advice agencies, tracing agencies, receivers, liquidators, examiners, official Assignee for Bankruptcy and equivalent in other jurisdictions, auditors and consultants, including legal advisors.

We may also share information with the following third parties to help us manage our business for our legitimate interests:

- Insurers/re-insurers and insurance bureaux.
- Trade associations and professional bodies, non-statutory bodies and members of trade association.
- Pension fund administrators, trustees of collective investment undertakings and pensions trustees.
- Persons making an enquiry or complaint.
- Healthcare professionals and medical consultants.
- Business partners and joint ventures. In such cases, we, our business partners or those involved in the joint venture will let you know that your information is being shared and who it is being shared with.
- Statutory and regulatory bodies (including central and local government) and law enforcement authorities.
- Credit reference/rating agencies, including The Irish Credit Bureau.
- Third parties in connection with a sale or purchase of assets by a member of Fidentia Insurance Brokers Group.
- Correspondent banks and other financial institutions engaged to supply status opinions in accordance with banking practice.
- Where you cannot be found or you become insolvent.

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

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:

Fidentia Insurance Brokers (Ireland) DAC 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**
- **Right to judicial review:** in the event that Organisation Name 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. Fidentia Insurance Brokers (Ireland) DAC will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Fidentia Insurance Brokers (Ireland) DAC or how your complaint has been handled, you have the right to lodge a complaint with the Fidentia Insurance Brokers (Ireland) DAC's data protection representative.

You may also lodge a complaint with the Data Protection Commission in Ireland, whose details are:

Data Protection Commission
Canal House,
Station Road,
Portarlinton,
Co. Laois, R32 AP23
Phone: + 353 57 868 4800 / + 353 761 104 800
Fax: + 353 57 868 4757
Web: www.dataprotection.ie
Email: info@dataprotection.ie

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.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 0044 207 150 0080 or email info@fidentiains.com

Privacy policy statement changes

Fidentia Insurance Brokers (Ireland) DAC 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 March 2021.