

Privacy Statement/Notice

8th September 2020

Wexford Financial Services Ltd t/a Wexford Insurances, Wexford Financial Services, Professional Indemnity.ie 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 (General Data Protection Regulation) in relation to not only processing your data but to ensure you understand your rights as a customer of ours.

It is the intention of this privacy statement to explain to you the information practices of Wexford Insurances in relation to the information we collect about you

The Data Controller is Wexford Financial Services Ltd t/a Wexford Insurances, Wexford Financial Services, Professional Indemnity.ie, The Arc, Drinagh, Wexford, Y35 RR92. Email info@wexfordinsurance.com

For the purposes of the GDPR the data protection officer:

Contact details: info@wexfordinsurance.com

When we refer to 'we' it is Wexford 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.

What is GDPR?

GDPR is the General Data Protection Regulation. It comes into effect from 25th May 2018. It sets out a series of new EU laws on how data is processed and used. The objective of the regulation is to strengthen and standardise data protection laws for all EU citizens. These regulations will apply to any organisation that controls and/or processes data on behalf of an individual or group of individuals. Those responsible for adhering to these regulations include employees of the organisation, including contractors, consultants, agents and third parties who have access to data either directly or indirectly.

What information do we collect?

Your Data:

- Contact and Identifying information. The types of information you give to Wexford Insurances may include name, date of birth, marital status, home address, contact address, email address, phone number, dependents, employment details, payment details, financial details or photo ID.
- Claims Data (From you and any relevant third parties)
- Health Information – *Sensitive information under GDPR*
- Criminal Conviction – *Sensitive Information under GDPR*
- When you provide personal information to us we will only use this information for the purposes described at point of collection such as for providing an insurance quote or applying for career options.
- **Special Category Data** -if we collect any special categories of personal data we will ensure that we obtain your explicit consent. Special Category data includes: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health data, data concerning a natural person's sex life or sexual orientation and genetic/biometric data processed to uniquely identify a natural person.

Other people's Data:

- As well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy.

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NOTE: If you are providing information about another person we expect you to show them this data protection notice and ensure that they have given you permission to provide this information to us and so that we can provide a quote. If they have any concerns please ask them to contact us as outlined in 'Contact us' section.

How do we collect your information?

We collect information from you when:

- i. You provide it to Wexford Insurances
- ii. When you use our products, services or our website
- iii. Information provided to us by Third Parties

How we use your Information

We use information about you to:

Provide professional services for our clients

- Identify ways we can improve our products and services
- Protect your interests and defend you
- Decide and recommend how our products and services might be suitable for you.
- Generate quotations and process applications and proposals for the products and services we offer
- Carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us
- Administer the products and services that we supply to you
- Process claims
- To contact you if required or to respond to any communications that you might send to us.
- We may contact customers by phone who avail of our online quotation platform to offer sales support
- To notify you about changes to our service
- To administer our site including data analysis, testing, research, statistical and survey purposes

Legal Basis

- In order to provide you with services such as: providing quotations, arranging policies, managing and administration of policies, claims handling or sharing personal details with insurers, other agents or any professional body such as medical or legal practitioners it is necessary for us to collect and process your personal data. We are required, therefore, to inform you of the legal basis for processing your personal data.
- One such legal basis is that 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.
- Wexford Insurances may disclose information it has collected about you on our websites if required to do so by law or when necessary to protect the rights of Wexford Insurances or its employees
- Use for our legitimate interests (which you may object to or opt to decline) such as managing our business including providing service information, conducting marketing activities, training and quality assurances, portfolio advice and strategic planning for retirement benefits.

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.

Who we share your information with?

We may make your information available to third parties with whom we have a relationship to provide services on our behalf. We will only provide to those third parties the information that is necessary for them to perform the services and we take measures to protect your information.

- Your authorised representatives.
- Third parties with whom we need to share your information to facilitate transactions you have requested and you ask us to share your information.
- Services providers who provide us with support services.
- Statutory and regulatory bodies (including central and local government) and law enforcement authorities.
- Third parties in connection with the sale or purchase of investment assets by us: persons making an enquiry or complaint, advice agencies and other regulated intermediaries, receivers, liquidators, examiners, official assignee for bankruptcy and equivalent in other jurisdictions including court orders.
- Trade associations and professional bodies, non-statutory bodies and members of trade associations.
- Pension fund administrations, trustees of collective investment undertakings and pensions trustees, insurers and product producers.
- Healthcare professionals and medical consultants.
- Business of joint venture partners
- Any prospective seller or buyer of any business or assets related to the site, a Wexford Insurances product or all or part of Wexford Insurances
- Any business partners, members of our corporate group, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- 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 hold your data for?

How long we hold your data for is subject to legislation and regulatory rules we must follow, set by authorities such as the Central Bank of Ireland and the type of financial product provided to you. 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 (Central Bank of Ireland) and our internal governance.

What happens if I don't provide my data?

If you do not provide information we may not be able to:

- Provide requested products or services to you
- To continue to provide and/or renew existing products or services
- Assess suitability for product/service recommendations

Profiling – automatic decision making

Profiling;

The main categories are

- Risk profiling.
- Profiling for marketing purposes.
- Establishing affordability and providing quotations for financial services and mortgage product

Risk Profiling

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

Profiling for marketing purposes

When we seek to contact you about other services, as outlined above we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs. We process information you give to us and information we receive about you from other sources. Note that we do not disclose personal information about you to third parties.

- Establishing affordability and providing quotations for financial services products.
- To provide you with information about other goods and services that we offer which are similar to those that you have already purchased or enquired about
- For occasional market research and statistical purposes. You may 'opt out' of participating in such market research at any time.
- To send you offers, with your consent, for products which we feel are relevant to your needs
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

How to access your information, rights including the rights to object?

Wexford Insurances facilitate you, our customers rights in line with our data protection policy and the subject access request procedure which is available on request.

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 Wexford 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.

If you wish to exercise any of your data rights, you can contact us at Wexford Insurances, The Arc, Drinagh, Co Wexford Y35 RR92, or at email: info@wexfordinsurance.com

Data Security

We have appropriate measures in place to ensure that users' personal details are not misused, accidentally destroyed, lost or altered when we process your data either by electronic or paper means. Occasions will arise when customer information is passed outside Wexford Insurances to our trusted third party suppliers, but they will only act upon instruction from Wexford Insurances in order to perform the services required.

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.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Wexford Insurances or how your complaint has been handled, you have the right to lodge a complaint with our Data Protection Officer

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
Web: www.dataprotection.ie
Email: info@dataprotection.ie

Contact Us

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

Wexford 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.