



DATA PRIVACY NOTICE

INTRODUCTION

At Dooley Insurance group we take your privacy seriously. We are committed to:

Protecting you and your information

The security of your personal information comes first.

Giving you control

We want you to have full control of your personal data. We will never abuse any information you permit us to use, nor will we inundate you with irrelevant promotional messaging. We will only use your data to improve the experience you have with our everyday services, or, where you have expressly consented, talk to you about new products or services we believe offer value to you or your business. We will never provide your information to other companies for marketing purposes without your express permission.

Being transparent

We want you to understand what we do with your information, why we do it and what it means to you. By being transparent, we hope to build on the trust you already have in us. We want to make our customers' lives better, and to be able to bring you products and services that are of benefit to you.

Creating value for you

The information you provide about yourself has value. With your explicit consent, we will selectively use your information to bring services, products and offers that we believe are of genuine relevance and interest to you. This Data Privacy Notice (Notice) is an important document. Please read it carefully. If you would like a printed copy, please contact us and we will send you a copy.

This notice applies to all our products and services. We will also provide you with additional information specific to a particular product or service if we use your personal data in a different way.

You have significant rights in relation to the processing of your personal data, including the right to object to the processing of your personal data where that processing is carried out for our legitimate interests.

We are committed to managing your personal data only in a manner that complies with applicable legislation. If you want to know more about how we gather, store, share or use your personal data, or if you want to make changes to the personal data that we store on your behalf, please contact us.

1) Who we are

Throughout this Notice, 'we', 'us', 'our' and 'ours' refer to Dooley Insurance Group which also trades under the name Dooley Insurances Ltd as well as Dooley Insurances & Mortgage Brokers.

2) The information we collect about you

Gathering and processing your personal data allows us to look after and to service the contract (policy) you have with us or are included in. Legislation and various codes of conduct require us to gather additional information from and about you. For example, we gather documentation to prove your identity and validate your address to comply with anti-money laundering legislation. We use this information to create a better understanding of all our customers, and to help us to meet changing needs. Having this information also allows us, where you have provided us with your explicit consent to do so, to update you about new offers or services that might be of interest.

3) When and how we collect information about you

We collect information you give us, information from your use of our products and services and information we get from third parties.

We collect information about you:

When you ask us to provide you with certain products and services. For example, certain insurance products require us to collect relevant health information from and about you.

When you use our website and online services provided by us (including mobile applications) and visit our offices.

When you or others give us information verbally or in writing, or if you make a complaint. This information can be on application forms, in records of your transactions with us and/or if you make a complaint.

When you use our products or services, including making transactions on your policy, we gather details about who you pay money to, how much the payments are for and when the payments are made.

From information publicly available about you. For example, in trade directories, on online forums, websites, Facebook, Twitter, YouTube and other social media. This information helps us to better understand your financial needs and helps us find out if specific products or services are suitable for you or can be recommended to you. From your online activities with third parties where you have given us your consent.

If you apply for or hold a financial product in joint names, you should not give personal information about someone else, for example as a joint applicant or dependant, without their permission.

4) How we use your information

A) To provide our products and services to you and perform our contract with you.

To provide our products and services to you and perform our contract with you we use your information, including where relevant special category data e.g. data relating to your health, to:

Establish your eligibility and acceptance for our products and services.

Manage and administer your accounts, policies, benefits or other products and services that we or, where you have consented, our partners provide you. For example, if you have a mortgage protection policy with us, we need to share information with other parties, such as your mortgage provider and your bank.

Process your application for insurance or financial services.

Carry out reviews, including automated decision processes (which can have a legal or similarly significant effect on you). We do this when you apply for a policy and keep a record of the review, even if the application does not go ahead.

Process payments that are paid to you or by you. For example, if you pay by direct debit, we will share transaction details with your payment service provider (for example, Bank of Ireland, etc.).

Contact you by post, phone, text message, email, social media, fax, using our online website or other means, but not in a way contrary to your instructions to us or contrary to law.

Monitor and record our conversations when we speak on the telephone.

Recover debts you have with us.

Manage and respond to a complaint or appeal.

B) When you apply to us for insurance and/or make a claim.

We will pass your details to the insurance intermediary, reinsurer, medical professional and/or claims agent.

We can request information relating to your health for underwriting and claims administration purposes. This information can be obtained by, or shared with, medical screening companies and claims handlers, as well as medical professionals.

We disclose your information to our agents and other insurers and third parties for administration, regulatory, customer care and service purposes and to investigate or prevent fraud.

C) When you take out a joint policy or product

Taking out a joint policy or product means that your personal data will be shared with the other applicant. For example, transactions made by you will be seen by your joint policy holder, and you will see their transactions.

D) To manage our business for our legitimate interests, subject to us not over-riding your interests or fundamental rights and freedoms.

To manage our business we use your information to:

Carry out credit management activities, including collecting and enforcing debts and arrears.

Provide service information, to improve our service quality and for training purposes.

Conduct marketing activities, including running competitions and promotions research, analytics and related activities where you have consented to such use.

Gather your information to assess the quality of service we provide you.

Risk management, strategic planning and business portfolio management.

Compile and process your information for audit, statistical or research purposes (including, in particular instances, making your data anonymous) to help us understand trends in our customer behaviour and to

understand our risks better, including for providing management information, operational and data risk management.

Test and maintain our systems.

Financially assess the performance of the business in line with reporting requirements and internal business assessment metrics.

Assist in compliance with our legal obligations in connection with the prevention of money laundering and terrorist financing. For example, to screen for suspicious transactions.

Protect our business, reputation, resources and equipment, manage network and information security (for example, developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services), and prevent and detect fraud, dishonesty and other crimes (for example, to prevent someone trying to steal your identity). We may also use CCTV at our premises.

Manage and administer our own legal and compliance affairs, including complying with regulatory guidance and mandatory or voluntary codes of practice to which we have committed.

Enable us to share or access your information for internal administrative purposes, audit, prudential, statistical or research purposes (including making your data anonymous) to help us understand trends in customer behaviour, for helping us to understand our target market better and for the purposes set out in this Privacy Notice (but not for the purposes of marketing where you have not consented to this).

Assist our business to buy or sell assets. Dooley Insurance Group may in the future wish to sell, transfer or merge part or all of its business or assets or to buy a new business or the assets of another business or enter into a merger with another business. If so, we may disclose your personal information under strict duties of confidentiality to a potential buyer, transferee, merger partner or seller and their advisers, so long as they agree to keep it confidential and to use it only to consider the transaction. If the transaction goes ahead, the buyers, transferee or merger partner can use or disclose your personal information in the same way as set out in this notice.

To facilitate potential or actual transfers of a product provided to you or in connection with a securitisation.

To transmit your details within the business and to third parties for internal administrative purposes, including the processing of your personal data, subject to having appropriate safeguards, including contractual provisions, in place.

E) To comply with our legal and regulatory obligations.

We need to use your information to comply with legal obligations including:

Complying with your data rights.

Providing you with statutory and regulatory information and statements.

Establishing your identity, residence and tax status in order to comply with law and regulation concerning taxation and the prevention of money laundering, fraud and terrorist financing. We are required by law to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result, we need to disclose information to government and other statutory bodies.

Preparing returns to regulators and relevant authorities, including preparing income tax, capital gains tax, capital acquisition tax and other Revenue returns.

Reporting to and, where relevant, conducting searches on industry registers.

Complying with binding requests from regulatory bodies including the Central Bank of Ireland.

Complying with binding production orders or search warrants, orders relating to requests for mutual legal assistance in criminal matters received from foreign law enforcement agencies/ prosecutors.

For other reasons where a statutory basis exists we do so, including use of your Personal Public Service (PPS) number.

Complying with court orders arising in civil or criminal proceedings.

F) Where you have given us consent (which you can withdraw at any time).

Where you have given us your consent including explicit consent (which you can withdraw at any time) we can:

Send electronic messages to you about product and service offers from our business.

Share your data with third parties for electronic messaging purposes.

Use cookies

Use your data for marketing purposes

Use your data to facilitate solely automated decisions that have a legal or similarly significant effect (for example, to approve or reject an application for a policy).

In circumstances where you purchase your policy/product through the Dooley Insurance Group to share your personal data with the Dooley Insurance Group to form a single view of your entire relationship with the Group. This will enable us to better manage and develop our relationship and provide you with the best possible customer experience.

Note: Withdrawal of your consent will not affect the lawfulness of any processing carried out while it was in place.

5) Who we share your information with

There's a number of individuals and companies with whom we share your information, but only as necessary and in accordance with applicable Data Protection rules.

Our product providers, as well as attorney and any other party authorised by you to receive your personal data.

Dooley Insurance Group in order to enable us to better manage our business e.g. to provide us with combat money laundering services etc.

Service providers who provide us support services. These include marketing and market research companies, analytics companies, investment companies, IT and telecommunication service providers, software development contractors, data processors, computer maintenance contractors, printing companies, property contractors, document storage and destruction companies, archiving services suppliers, debt collection and tracing agencies, reinsurance companies, medical professionals, claims handlers, consultants and advisors including legal advisors and third party administrators.

Note: We only permit service providers to use your information in accordance with our instructions, and we ensure that they have appropriate measures in place to protect your information.

Third parties with whom we share your information at your request, such as your employer, other life assurance companies and pension providers.

Statutory and regulatory bodies. These include the courts and those appointed by the courts, government departments, statutory and regulatory bodies in all jurisdictions where Dooley Insurance Group operates including: the Central Bank of Ireland, the Office of the Data Protection Commissioner, Financial Services and Pensions Ombudsman, Pensions Authority, An Garda Síochána/police authorities/enforcement agencies, Revenue Commissioners, Criminal Assets Bureau, EU and other designated authorities in connection with combating financial and other serious crime.

Third parties in connection with a sale or purchase of assets by a member of our Group. For example parties who are interested in or participating in buying or selling, (including by way of a loan assignment/transfer and securitisation scheme, collateralisation scheme or any other funding arrangement).

Payment facilitators and other financial institutions, such as SWIFT, MoneyGram, banks and building societies.

Courts and court-appointed persons/entities.

Receivers, liquidators, examiners, official Assignee for Bankruptcy and equivalent in other jurisdictions, debt collection agencies, budgeting and advice agencies and tracing agencies.

National Treasury Management Agency (NTMA) and its agents or other parties designated by or agreed with NTMA or designated under the relevant legislation.

Trade associations such as Insurance Ireland and professional bodies, non-statutory bodies.

Business associates and other advisers.

Employers.

Pension fund administrators and pensions trustees.

Police forces and security organisations, ombudsmen and regulatory authorities, as well as fraud-prevention agencies.

Insurers/re-insurers and insurance intermediaries.

Healthcare professionals and medical consultants.

Business partners, auditors, and joint ventures we, our business partners or joint ventures will tell you about any such sharing of your information.

6) HOW LONG WE HOLD YOUR INFORMATION

The length of time we hold your data depends on a number of factors, such as regulatory rules and the type of financial product we have provided to you. These factors include:

The regulatory rules set by authorities like the Central Bank of Ireland and the Data Protection Commission, etc.

Any statutory obligations we are subject to, including the Pensions Act 1990 and the Unclaimed Life Assurance Policies Act 2003 etc.

The type of product we have provided to you.

Whether you and/or us are in a legal or other type of dispute with another person or each other.

The type of data we hold about you

Whether you or a regulatory authority asks us to keep it for a valid reason.

As a general rule, we keep your information for a specified period of time from the date of when your contract ceases and/or you cease to be a customer. Typically this period is 7 years, however it may be held for a longer or shorter period depending on a number of factors, including

- the type data,
- the purpose for which it was collected,
- regulatory rules, and
- the type of product we have provided.

7) IMPLICATIONS OF NOT PROVIDING INFORMATION

We need your information in order to:

Provide our products and services to you

Fulfil our contract with you

Comply with our legal obligations

Manage our business for our legitimate interests

Of course, you can choose not to share your information, but doing so will limit the services we are able to provide to you.

We will not be able to provide you with certain products and services that you request.

We will not be able to continue to provide you with or renew existing products and services.

We will not be able to assess your suitability for a product or service, or, where relevant, give you a recommendation to provide you with a financial product or service.

When we request information, we will tell you if providing it is a contractual requirement or not, and whether or not we need it to comply with our legal obligations.

8) THE LEGAL BASIS FOR USING YOUR INFORMATION

We will use your data and share your data where:

Its use is necessary in relation to a service or a contract that you have entered into or because you have asked for something to be done so you can enter into a contract with us.

Its use is necessary because of a legal obligation that applies to us (except an obligation imposed by a contract). An example of this would be us sharing your information with the Revenue Commissioners in the case of a pension or life assurance policy.

You have consented or explicitly consented to the using of your data in a specific way.

Its use is necessary to protect your "vital interests". This will only arise in exceptional circumstances where we will use and/or disclose information about you to identify, locate and protect you, for example, if it comes to our attention that you are in imminent physical danger and this information is requested by An Garda Síochána or your relative.

Its use is in accordance with our legitimate interests e.g. to manage our business, subject to those interests not over-riding your fundamental rights and freedoms.

9) WHERE YOUR INFORMATION IS STORED

Your information is stored on systems within Dooley Insurance Group's premises and with providers of information storage. We transfer information about you and your products and services with us to our service providers and other organisations. It might be the case that a number of these are outside the European Economic Area (EEA), but only if they agree to act solely on our instructions and protect your information to the same standard that applies in the EEA.

For example, we process payments using third parties (including other financial institutions such as banks and worldwide payments system) if, for example, we make a foreign payment to you. Those external organisations will process and store your personal information abroad and can have to disclose it to foreign authorities to help them in their fight against crime and terrorism.

10) HOW TO EXERCISE YOUR INFORMATION RIGHTS INCLUDING THE RIGHT TO OBJECT

Providing and holding personal information comes with significant rights on your part and significant obligations on ours.

You have several rights in relation to how we use your information:

Find out if we use your information, to access your information and to receive copies of the information we have about you.

Request that inaccurate information is corrected and incomplete information updated.

Object to particular uses of your personal data for our legitimate business interests. However, doing so will have an impact on the services and products we can / are willing to provide.

Object to use of your personal data for direct marketing purposes. If you object to this use we will stop using your data for direct marketing purposes.

Have your data deleted or its use restricted – you have a right to this under certain circumstances. For example, where you withdraw consent you gave us previously and there is no other legal basis for us to retain it, or where you object to our use of your personal information for particular legitimate business interests.

Transfer your information to another provider, known as the right to data portability.

Withdraw consent at any time, where any processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on consent before its withdrawal.

We will endeavour to respond to you as soon as we can. If we are unable to deal with your request fully within a month (due to the complexity or number of requests), we may extend this period by a further two months. Should this be necessary, we will explain the reasons why.

You also have the right to complain to the Data Protection Commission or another supervisory authority.

11) HOW TO CONTACT US AND/OR THE DATA PROTECTION COMMISSION

You can contact the Office of the Data Protection Commission at:

<https://www.dataprotection.ie>

Telephone +353 (0)761 104 800

Lo Call Number 1890 252 231

Fax +353 57 868 4757

E-mail info@dataprotection.ie

Postal Address:

Data Protection Commission
Canal House
Station Road
Portarlinton
R32 AP23
Co. Laois

How to contact us and/or our Data Protection Officer

If you have questions about how your information is gathered, stored, shared or used, or if you wish to exercise any of your data rights, we would ask that you contact us by post in the first instance using the address below by completing a Subject Access Request (SAR) Application Form which is available on our website.

Data Protection Officer
Dooley Insurance Group
2(A) Sycamore House
Millennium Park
Naas
Co. Kildare

Incoming and outgoing calls may be recorded for service, verification, analysis and training purposes.

You can contact our Data Protection Officer online at info@dooleyinsurances.com

12) CHANGES TO THIS NOTICE

We will update this Data Privacy Notice from time to time. Any changes will be made available on our website.