

Optis Insurances Privacy/Personal Data Protection Notice

GENERAL

Optis Insurances Limited trading as Optis Insurances whose address is Unit 14, Scurlockstown Business Park, Trim, Co. Meath together with any group companies (“we”, “us”, “our”) are committed to respecting and protecting your privacy.

For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data. There may be additional/joint data controllers including your intermediary, insurers and third party service providers where such parties collect personal data directly from you, the “data subject”. Please read this notice carefully to understand our views and practices regarding your personal data and how we will treat it.

CHANGES TO THIS NOTICE

This notice may be updated from time to time and the effective version will be posted on our website. It is important that you check it each time you submit personal data to us or use our services.

ABOUT/CONTACT US

We are an insurance intermediary regulated by the Central Bank of Ireland. We distribute insurance products on behalf of Irish and international insurance companies exclusively through a network of retail insurance brokers. We have been granted authority by these insurance companies to bind insurance policies on their behalf and carry out certain administrative tasks in relation to these policies.

Our Data Protection Officer may be contacted at:

The Data Protection Officer, Optis Insurances Limited, Unit 14, Scurlockstown Business Park, Trim, Co. Meath.
Telephone: (046) 9481667
Email: dpo@optis.ie

HOW AND WHY WE COLLECT AND USE PERSONAL DATA?

We collect and process your personal data for the provision and administration of insurance products and services such as providing quotations, incepting and amending policies, policy administration and handling claims.

We may also use your data for other related activities such as complaint handling, prevention of fraud and statistical analysis.

When you seek/hold an insurance product from us we will collect information in relation to the type of risk you wish to be covered by the insurance product such as details of your business, turnover, employee information, etc.

This information may include special categories of data (such as details of unspent criminal convictions or medical history) and we will seek your consent prior to processing special categories of data.

Where appropriate we may collect personal data from you that relate to other people such as employees, persons entitled to indemnity under your policy, claimants, sub contractors, etc.

Prior to providing us with this information you agree to obtain agreement from such persons to the sharing of their personal data and to bring this notice to their attention.

To provide services to you we may collect and process data about you from your intermediary/broker and also by post, email, telephone, post and via our website. We may record calls for training and verification purposes.

When you visit our website we may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device’s operating system and browser type, for system administration. This is statistical data about our users’ browsing actions and patterns, and does not identify any individual.

OUR LEGAL BASIS FOR COLLECTING AND USING YOUR PERSONAL DATA

Our legal basis for the collection and processing of your personal data is set out here:

Purpose	Legal Basis for necessary processing
<ul style="list-style-type: none">- Provide quotations- Underwriting and pricing- Incept/renew policies- Policy administration- Renewal processing- Communicate with you- Communicate with your intermediary/broker- Receive/make payments- Manage claims	Performance of a contract or to take steps at your request prior to entering a contract
<ul style="list-style-type: none">- Auditing; internal & external- Call recording for training and verification purposes- Customer service- Employees/applicants for employment	For legitimate business interests;
<ul style="list-style-type: none">- Fraud prevention/investigation- Verify your identity- Compliance with laws & regulations- Manage and investigate complaints- Anti - money laundering compliance	To comply with legal obligations

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WHAT PERSONAL DATA DO WE COLLECT FROM THIRD PARTIES?

We may collect personal data about you from third parties, including (but not limited to):

1. Your broker or intermediary
2. Third parties acting on your behalf
3. Insurance industry databases
4. Geocoding databases (to determine location and risk)
5. Credit reference agencies
6. Business search databases such as CRO
7. Publicly available online searches including social media
8. Third party service providers such as loss adjusters, solicitors, claims management companies.
9. Third parties involved in a claim

WHO MIGHT WE SHARE YOUR PERSONAL DATA WITH?

We may share personal data about you with third parties, including (but not limited to):

1. Insurance companies/product providers
2. Your broker or intermediary
2. Third parties acting on your behalf
3. Insurance industry databases
8. Third party service providers such as loss adjusters, solicitors, claim management companies.
9. Our professional advisors such as accountants and legal advisors
10. Regulators such as the Central Bank of Ireland
11. Other companies in the insurance market such as Lloyds brokers, managing general agents, insurers.

Many of these third parties will have their own data protection and privacy policies which may be referred to in their respective policy documents.

Policyholders or proposers of XL Insurance Company SE, Catlin Underwriting Agencies Limited (on behalf of the underwriting members of Lloyd's Syndicates 2003, 3002 and 2088) and XL Catlin Insurance Company (UK) Limited may obtain more information about how they process your personal information, in their full privacy notice at: <http://xlgroup.com/footer/privacy-and-cookies> or by contacting them on compliance@xlcatlin.com

Some of your personal data may be sent to other parties outside of the European Economic Area (EEA). We would only do this in compliance with the appropriate legal and technical safeguards such as the standard data protection clauses adopted by the European Commission or as a result of an adequacy decision of the European Commission

HOW LONG WILL WE KEEP HOLD OF YOUR PERSONAL DATA?

The time periods we retain data for vary depending on the purposes for which we use it. We will keep personal data for no longer than is required or permitted and as set out in our data retention policy. Some of the key periods include:

Proposer Personal Data (Quotations & Proposals)	15 months from date of quotation/proposal
Policyholder Personal Data	72 months after cessation of the policyholder relationship
Claims Personal Data	72 months from finalisation of the claim

In some circumstances we may anonymise your data so that it can no longer be associated with you. In such circumstances we may continue to use this data for research and analysis without further notice to you.

AUTOMATED DECISION MAKING

We use automated (computer based) decision making for pricing and underwriting purposes and to calculate the premium you will have to pay in order to provide you with a quotation.

Where a decision is based on automated decision making you have the right to request human intervention to contest the decision and allow you to make a personal representation.

YOUR PERSONAL DATA RIGHTS

You, as a data subject, have the following rights in relation to the personal data we hold about you:

Right of access: You have the right to request a copy of the data.

Right of rectification: You have a right to rectify any inaccurate or incomplete data.

Right to be forgotten: In certain circumstances (i.e. where it is no longer necessary) you can ask us to erase the data.

Right to restriction of processing: In certain circumstances you have a right to restrict the processing of your data.

Right of portability: You have the right to have the data we hold about you transferred in a portable format.

Right to object: Where our lawful basis for processing is based on our legitimate interests you have the right to object

Right to withdraw consent: If we rely on your consent to process your personal data you have a right to withdraw this consent

Automated decision making: You have the right not to be subject to automated decision making processes.

Please note that if you choose to restrict or revoke the collection and processing of your personal data we may not be able to continue providing certain products and services to you.

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COMPLAINTS

If you are unhappy with the way we have handled your personal data you should contact our Data Protection Officer. You also have the right to lodge a complaint with the Data Protection Commissioner. Their contact details are as follows: The Office of The Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23. www.dataprotection.ie Tel.: +353 (0)761 104 800.

E-Mail: info@dataprotection.ie

Last updated: 18/06/2018.