

# Data Privacy Notice

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## 1. WHO WE ARE

Cornmarket Group Financial Services Ltd. (Cornmarket) with our head office at Christchurch Square, Dublin 8, is one of Ireland's largest Insurance Brokers. We specialise in serving the financial needs of affinity groups and place a particular focus on the Public Sector. Working closely with unions and other employers, we help our customers find the right financial products to suit their needs, with everything from car, home and health insurance to life insurance, income protection, retirement planning, mortgages, a tax return service and more. Cornmarket is a member of the Irish Life Group Ltd. which is part of the Great-West Lifeco Group of companies.

## 2. WHAT IS A DATA PRIVACY NOTICE & WHY IS IT IMPORTANT?

We know your personal information is important to you and it is important to Cornmarket too. This Data Privacy Notice tells you what we use your personal information for and explains your rights around how we use it. Please read this Data Privacy Notice to understand how and why we use your personal information.

If you give us personal information about someone else, please make sure you have their permission and make them aware of this Data Privacy Notice.

## 3. WHAT INFORMATION WE COLLECT AND WHY (OUR LEGAL BASES FOR PROCESSING)

We use personal information, including special categories of personal data and other sensitive personal data (e.g. health information, union membership, penalty points, Personal Public Service (PPS) Number) to advise you about financial products and services we offer and to administer these products and services should you decide to go ahead with taking out a financial product or service through Cornmarket. We must have a lawful basis to collect and use personal information. These legal bases are explained below:

### **Necessary for the performance of a contract:**

We need to collect and use your personal information to arrange for your policy contract through the relevant insurer who underwrites any policy you choose to go ahead with; to provide you with a tax return service as part of our Tax Return Service; or to arrange for a financial product from a financial institution whose products we offer and of which you may wish to avail. The information collected includes, but is not limited to, your name, date of birth and contact details. Depending on the policy or service type this can include health, employment, pension and salary information and your PPS number. We restrict access to, and the use of, special categories of data and other sensitive personal information.

The personal information needed for policy contracts and financial products and services is held and used to:

- verify your identity and to verify the accuracy of the information we receive about you
- assess the information you have provided and to make a decision as to whether we can provide you with cover through the relevant insurer/offer you a product through the relevant financial institution
- assess financial information you have provided us with as part of our Tax Return Service and to file a tax return on your behalf where you have provided your authorisation to do so
- correspond with the Revenue Commissioners when reviewing your tax affairs as part of our Tax Return Service to ensure accuracy of your tax return. We will only do so with your authorisation
- provide you with a quotation for an insurance product and to arrange for the provision of specific insurance cover should you decide to purchase a product through Cornmarket
- facilitate your loan application process through the relevant bank or mortgage lender
- share your personal information with the relevant insurer to ensure that you have the appropriate cover in place
- provide you with information about any policy/financial product/service that you have taken out through Cornmarket
- provide customer care and service – to administer any policy/financial product/service that you have taken out through Cornmarket and make any changes during its term, answer queries, provide updates or process a cancellation
- contact you to inform you of any relevant actions you may need to take
- manage and investigate any complaints you may have in relation to our Tax Return Service
- receive any payments in relation to your membership of our Tax Return Service, or in relation to your insurance policy for onward transmission to the relevant insurer where appropriate
- store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes
- assist you in the making of a claim through the relevant insurer.

### **Required by law:**

Below is how we use your personal information to comply with all relevant laws and regulations:

- For the provision of financial advice, you must give personal and financial information for your current and future needs to be assessed. This allows us to assess your affordability and recommend the most suitable financial product for you. This also involves creating new personal information about you. We are required to complete this analysis of you, using your personal information, in order to comply with regulations applicable to Cornmarket
- Reporting to regulators, the Revenue Commissioners and other official government agencies
- Keeping proper books and records
- To manage and investigate any complaints.

We carry out internal reporting, quality checking, compliance controls and audits to help meet our legal obligations.

We must collect certain personal information to comply with Anti-Money Laundering law. This depends on your policy type and may include:

- Up to date proof of identification and address

We use our customers' personal information, including yours, to identify the target market for our regulated products and services.

When you give us your personal information we will check to see if we already have a record of you. This helps us to comply with your Data Protection rights. Please see Section 10 of this Data Privacy Notice for more details about your rights.

If you visit our offices we will record CCTV footage for safety and security reasons. We only hold these recordings temporarily and for longer if we need to for safety and security investigations.

### **Cornmarket's legitimate interests:**

We use your personal information for our legitimate interests as shown below. This doesn't affect your privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions using the contact details in Section 11 of this Data Privacy Notice. You can object to this processing at any time.

#### **• Call Recording:**

- o For transacting business and for customer service purposes, we record and monitor calls. We let you know if a call is being recorded at the start of the call so you can decide whether to continue or not.

#### **• Statistical Analysis:**

- o We combine our data for analysis to help us understand our customers and develop better products and services and for reporting purposes. We use the anonymised information to help promote our products and services.

#### **• Details of your Occupation and Workplace:**

- o We use details of your occupation and workplace to inform you about products and services that are suitable for you based on this information.

#### **• Market Research:**

- o We carry out market research inclusive of customer surveys, to improve our processes, products or services or to investigate the possibility of new processes, products or services and to buy or sell any business or assets.

#### **• Union Specific Rewards Programs:**

- o When signing up for union membership, certain unions allow their members to join Rewards Programs. These Rewards Programs are provided by Cornmarket in conjunction with the relevant union and provide Rewards Members with certain discounts across a range of products that we offer. If you choose to join the Rewards Program as part of your union membership, we will contact you by post, email, telephone, mobile phone or SMS so you can avail of the discounts available to you as a Rewards member.

#### **• Where you have Registered your Interest for a Particular Product, Offer or Service:**

- o We will contact you about particular products, offers or services where you have registered an interest for these.

**With your consent:**

You need to give consent for us to collect and use personal information classed as sensitive or for certain uses of your personal information. You are given the choice to provide consent, or not. When we collect your consent, we will explain what we need it for and how you can change your mind in the future.

• **Your Union Membership:**

- o We use your union membership to determine your eligibility for certain insurance policies that we offer. In the absence of your consent to our processing of your union membership we will be unable to provide you with products where union membership forms part of the eligibility criteria for the policy.
- o We also use your union membership to advise you about products, services and discounts available to specific unions which may be of interest to you. We will use your union membership for this purpose where you have also provided your consent to direct marketing (see more information below regarding direct marketing). In the absence of your consent to our processing of your union membership we will be unable to advise you about products, services and discounts available to union members.

• **Direct Marketing:**

- o We would like to be able to contact you about offers and services, separately from your policy communications. We will only send you direct marketing content where we have your consent.
- o Your information will not be passed on to third parties for the purposes of direct marketing.

• **Cookies:**

- o We collect information about your online activity on the Cornmarket website using technology known as cookies. For detailed information on the cookies we use and the purposes for which we use them please see our Website Privacy Statement available at [www.cornmarket.ie/website-privacy-statement](http://www.cornmarket.ie/website-privacy-statement)

**4. CONSENT AND HOW TO WITHDRAW CONSENT?**

If we process your personal information based on consent, you have the right to withdraw that consent at any time. The opt-out methods will depend on how the consent was collected and will be explained when you give us your consent, e.g. you can change your mind using the opt-out link in any direct marketing emails sent to you.

You can withdraw your consent by the following means in relation to the processing of your union membership:

By writing to: Cornmarket Group Financial Services Ltd, Christchurch Square, Dublin 8

By emailing: [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

By telephoning: 01 4084000

You can withdraw your consent by the following means in relation to direct marketing. (Please ensure to specify what communication channels you want to be opted out from)

By writing to: Cornmarket Group Financial Services Ltd, Christchurch Square, Dublin 8

By emailing: [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

By telephoning: 01 4084000

Online at: [www.cornmarket.ie/email-opt-out](http://www.cornmarket.ie/email-opt-out)

**5. AUTOMATED DECISION MAKING INCLUDING PROFILING**

The relevant insurer for your policy may use automated decision making in the calculation of premiums or during the underwriting process in order to provide you with cover. Please refer to the relevant insurer's Data Privacy Notice for more information in relation to this.

**Risk Profiling**

To establish a customer's attitude to investment risk in relation to pensions and investments, our financial advisors use automated software which determines the customer's attitude to various levels of risk having answered a series of questions.

Where any automated decision produces legal effects for you or otherwise significantly affects you, you will have the right to obtain human intervention and to contest and make representations in relation to the decision in

question.

## 6. HOW AND WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?

You provide us with your personal information directly when you contact us, complete our forms, speak with us or visit our website, social media accounts, use webchat or use the MyCornmarket app. For more information on what personal information is collected and used on our website please see our Website Privacy Statement which includes information regarding our use of Cookies and is available at [www.cornmarket.ie/website-privacy-statement](http://www.cornmarket.ie/website-privacy-statement)

From time to time we also receive personal information from insurers, banks or mortgage lenders, solicitors, your union, the Revenue Commissioners (with your authorisation), accountants, other third parties you may have nominated or employers.

We also create new personal information about you based on information you have provided us and through your interactions with us such as noting your online preferences.

## 7. WHO DO WE PASS YOUR PERSONAL INFORMATION TO?

We pass personal information to:

### • Insurers:

- o We share your personal information with the relevant insurer(s) to provide you with quotations, to process your applications, to ensure that you have the appropriate cover in place and to process claims where relevant. This includes insurers for specific benefits on motor and home insurance policies such as legal expenses cover, driveaway assistance and home rescue cover.
- o Scheme reviews are carried out to ensure we obtain the best price and benefits for the policies we administer. This may sometimes lead to a new insurer being selected to underwrite a particular Scheme. In the event of this happening, your personal data will be transferred to the new insurer.
- o We share your personal data with the relevant insurer for Schemes to ensure that these Schemes remain competitive.

### • Banks/Mortgage Lenders:

- o We share your personal information with the relevant bank(s) or mortgage lender(s) to provide you with a requested mortgage quotation, to process your mortgage application, to ensure that you have the most suitable mortgage loan in place and to process the drawdown of the mortgage funds. We will only do so with your permission.

### • Valuers:

- o We share your personal information with the relevant bank or mortgage lender valuer(s) to request them to provide the lending bank or mortgage lender with a Mortgage Valuation as per the mortgage loan conditions. We will only do so with your permission.

### • Your Authorised Representatives:

- o We share your personal information with third parties you have nominated to deal with our company on your behalf.

### • Scheme Owners of Group Salary Protection/Group Life Policies:

- o From time to time, we share your personal information with scheme owners for reconciliation purposes, and as part of Scheme Reviews. The information shared is minimised. In the event of a claim or a dispute we will only discuss your case with representatives of Scheme Owners where we have your consent to do so.

### • Data Processors:

- o We share your personal information with companies that act as service providers under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used by other parties for any other reason. The categories of services that we use other Data Processors for include: document management and disposal, to facilitate the completion of a tax return as part of our Tax Return Service, to facilitate the application process for cover/mortgage finance, I.T. services, security, customer services, making and receiving payments and marketing.

### • Trustees:

o We share your personal data with appointed trustees in connection with the policy contract.

• **Regulators and Other Official Agencies:**

o Regulators, An Garda Síochána, the Revenue Commissioners, other official agencies or as needed to comply with regulations and laws and on foot of a Court Order or Subpoena.

• **Other Third Parties:**

o We may also from time to time take instructions from third parties (usually by phone or email) to alter policies (such as a motor dealer instructing us to change the vehicle cover for a motor insurance policy) or to seek information on a customer's policy (such as a Building Society seeking information on the buildings insured where they hold an assignment on the policy). It is our practice in such circumstances to accept such instruction or provide such information in good faith as a facility to our customers.

• **Employers:**

o We may share your personal information with your employer in order to facilitate premium payments or for the purposes of making a claim. We will only do so with your authorisation.

**8. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)?**

Your personal information is processed and stored within the EEA. However, we do pass personal information securely to Canada in order to support the transfer of information from Cornmarket to our underwriters and business partners. When we do certain secure transfers these files temporarily reside on Canadian servers owned by Great West Life Co. Passing your personal information to certain countries, including Canada, is allowed under an adequacy decision made by the European Commission.

We also pass your information to an email service provider in the United States of America for the purposes of sending you emails regarding policies you have in place through Cornmarket and regarding other products we offer. This Data Processor is a certified company under the EU-US Privacy Shield. This company only uses your personal information to provide you with emails relating to your policy or other products that we offer, on our behalf.

**9. HOW LONG DO WE KEEP PERSONAL DATA FOR?**

We keep and use your personal information for as long as you have a policy contract/financial product or service through Cornmarket. We also hold it after your relationship ends with Cornmarket where we need to for complaints handling, legal claims, for system back-ups and for as long as we have to under regulations.

Information submitted for a quotation for general insurance (home, motor, and health insurance), where you choose not to go ahead with the policy, will be retained by us for a period of up to 15 months from the date of the quotation.

Information provided by you for a financial health check or for a mortgage application, where there is no associated sale of a financial product, will be retained for as long as necessary in order to ensure compliance with the requirements of the Consumer Protection Code 2012.

After the periods set out above, we will de-personalise (anonymise) or delete the personal data. De-personalisation means that we will delete certain aspects of the information we hold which makes this identifiable (such as name and street address) so that we can no longer determine who it relates to. This results in the data no longer being considered personal data.

**10. WHAT ARE YOUR RIGHTS?**

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details in Section 11 of this Data Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month. This period may be extended for a further 2 months. If we need this extra time to deal with your request, we will notify you of the fact that there will be a delay and the reasons for it within a month of your request being made. Likewise, if we have reason to refuse your request, we will notify you within a month of the refusal and the reason for it.

• **Right to Information**

You have a right to the information set out in this Data Privacy Notice. We will inform you of our updated Data

Privacy Notice, if we change the type of personal information we collect and / or how we use it.

We have controls in place to protect your personal information and minimise the risk of security breaches. However should any breaches result in a high risk for you, we will inform you without delay.

#### • **Right to Restrict or Object**

You can restrict or object to any unfair and unlawful collection or use of your personal information.

You can object to any automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person.

Where we state in this Data Privacy Notice that we process your personal data on the basis of a legitimate interest, you are entitled to object to the processing in question on grounds relating to your particular situation. We will then stop processing the personal data in question unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or unless we need to use it in relation to legal claims. Please note that if you object to us processing your data, we may not be able to provide certain services or benefits you would otherwise be entitled to under any insurance policy contract or financial product or service you have availed of.

You can withdraw consent and object to the processing of your personal data for direct marketing purposes.

#### • **Right to Correct and Update**

You can ask us to correct and update personal information we hold about you.

Some of the policies which Cornmarket administers, or services which Cornmarket provides, are long term contracts. It is important we have your up to date personal information, such as contact details to provide you with the best service. Please ensure to advise us of any updates to your personal data.

#### • **Right to Delete and Be Forgotten**

You can have your personal information deleted if it is incorrect or has been processed unfairly or unlawfully.

If we have provided a regulated product or service to you, we must keep your personal information for a minimum period by law. Personal information gathered for other non-regulated products or services that we provide must also be kept for a minimum period by law.

If you have withdrawn consent you can ask for your personal information to be deleted unless it was provided for a regulated product or service.

#### • **Right to Portability**

You can ask for a copy of all personal information that you gave us which is held by us in an automated format. This is only in relation to personal data that we process on the legal basis of consent or for the purpose of entering or performing a contract and where the processing is carried out by automated means.

You can receive this in a machine readable format.

You may also request Cornmarket to send this personal information in a machine readable format to another company.

The format will depend on our ability to provide this in a secure way that protects your personal information.

We will not likely be able to use a copy of your personal information sent to us in this way from another company. This is because we can only collect personal information that we need. We also need your most up to date personal information to comply with regulations.

#### • **Right to Access**

You have the right to know what personal information we hold about you and to receive a copy of your personal information.

We must tell you:

- o why we hold it,
- o who we pass it to, including whether we transfer it outside the EEA,
- o how long we keep it for,
- o where we got it from, and



- o if we carried out any automated decisions, and if so, the logic behind these and what it means for you.

This right does not allow you to access personal information about anyone else.

To access your personal information please write to us using the contact details in Section 11 of this Data Privacy Notice. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information.

## 11. HOW TO CONTACT US AND/OR OUR DATA PROTECTION OFFICER

If you have any questions about your personal information and this Data Privacy Notice or if you wish to exercise any of your rights, please contact us at:

### **Cornmarket Group Financial Services Limited**

Christchurch Square

Dublin 8

**Telephone:** +353(0)1 4084000

**Email:** [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

You can also contact our Data Protection Officer directly using the details set out above by ensuring to address your correspondence to the Data Protection Officer.

## 12. COMPLAINTS

If you do not think that we have processed your personal information in line with this Data Privacy Notice, please contact us directly at:

### **Cornmarket Data Protection Officer**

Cornmarket Group Financial Services Limited

Christchurch Square

Dublin 8

**Telephone:** +353(0)1 4084000

**Email:** [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

If you are not happy with how we have processed your personal information or handled your privacy rights, you can complain to the Data Protection Commission by contacting them using the details below:

### **Data Protection Commission,**

Canal House,

Station Road,

Portarlinton,

Co. Laois, R32 AP23

**Telephone:** +353(0)761 104800

**LoCall:** 1890 252231

**Fax:** +353 57 8684757

**Email:** [info@dataprotection.ie](mailto:info@dataprotection.ie)

## 13. CHANGES TO OUR DATA PRIVACY NOTICE

We may update this Data Privacy Notice from time to time. Any changes will be published on this page [www.cornmarket.ie/data-privacy-notice](http://www.cornmarket.ie/data-privacy-notice)

**This Data Privacy Notice is effective from 1st January 2019.**