



**Motor, Household, Farm, Commercial, Life, Pensions & Investments**

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## Privacy Notice/Statement

### Introduction

Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance 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 Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance
- Contact details of Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance are (049) 5552178 or [info@fwecroweinsurance.com](mailto:info@fwecroweinsurance.com)
- When we refer to 'we' it is Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance

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?

- Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance is a family run business offering a professional yet personal approach, providing new and existing clients with a range of insurance, protection, savings and pension products, that offer security, peace of mind and value for money.

In recent years the business has expanded its commercial base and now offers an increased range of products from an increased range of providers delivered to an ever growing clientele.

- Car Insurance
- Home Insurance
- Farm Insurance
- Commercial Insurance
- Life, Pensions, Savings and Investments

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

- Name Alison Crowe or David Rafferty
- Email address info@fwecroweinsurance.com
- Phone number 049-5552178

### Purpose for processing your data

In general, you may visit this website without identifying yourself or revealing any personal data. Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance collects domain information from your visit to customise and improve your experience on our website.

This website may collect certain information from your visit, including the date and time of your access, the pages you have accessed, the name of the Internet Service Provider (ISP) and the Internet Protocol (IP) address by which you are accessing the Internet, and the Internet address from which you linked to our site, if applicable. We use this information to better understand how our website is being used so that we can improve its performance.

Some portions of this website, however, may request that you give us information about yourself, from which we are able to identify you: for example, our Contact Us form or Online Quote service.

In this case, we process your personal data in order to provide insurance quotation and placement service, i.e. processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract. We process your personal data to:

- introduce, propose or carry out other work preparatory to the conclusion of contracts of insurance
- carry out administration of contracts of insurance at inception, mid-term, renewal and throughout the term of the policy
- assist in the event of a claim
- comply with regulatory, industry and tax legislation
- carry out internal reporting.

Such personal data may include:

- Name
- Address
- Phone number
- E-mail address
- Date of birth
- Occupation
- CV's
- Convictions, claims, penalty points, etc.
- Risk details, e.g. driving licence, NCT, vehicle information, property, turnover/fee income, etc.
- Banking details for premium credit facility
- Medical history.

It may sometimes be necessary to transfer personal information overseas. When this is needed, information is only shared within the European Economic Area (EEA). Any such transfers are made in full compliance with all aspects of data protection.

## Why we are processing your data? Our legal basis.

In order for us to provide you with insurance quotations and placement services Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance need to collect personal data for *the provision of this service*. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** - (Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract.

In any event, Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance 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 Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance use the personal data it collects about me?

Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance 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 Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance 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 Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance 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 are:

- Insurers and third party underwriters that we obtain quotations from
- Insurance software providers
- Premium financing companies for the purposes of arranging a premium credit facility for you
- Re-insurers

- Parties acting on your behalf, e.g. insurance intermediary, insurer, loss assessor, solicitor, executor, garage, repairer, etc.
- Parties acting on the insurer's behalf, e.g. loss adjusters, external investigators, medical practitioners, solicitors, repairers, etc.
- Surveyors, advisors and consultants for the purposes of surveying or assessing a risk
- The Central Bank of Ireland, the Financial Services & Pensions Ombudsman or any equivalent supervisory or regulatory body
- The Gardaí, Revenue Commissioners or any other persons authorised by law to access records
- Computer network maintenance companies.

We have issued all 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:

Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance 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** - 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 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. Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body and our internal governance.

Type of data	Legal basis	Retention period
Personal customer data: all insurance policies	Consumer Protection Code 2012	6 years from the date of the transaction or the date F.W.E. Crowe Insurance ceased to provide product/service to the consumer
Credit card information	General Data Protection Regulation	For duration of the transaction

### Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance data protection representatives GDPR Owner.

### Failure to provide further information

If we are collecting your data for a contract of insurance and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

### Profiling - automatic decision making

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Profiling;

Financial and mortgage advisors using profiling in their business. The main categories are

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

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

- b) 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.

a) Establishing affordability and providing quotations for financial services products.

### **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 prior to processing this data.

**Contact Us**

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on (049) 5552178 or email [info@fwecroweinsurance.com](mailto:info@fwecroweinsurance.com)

**Privacy policy statement changes**

Alison Crowe & David Rafferty t/a F.W.E. Crowe Insurance 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.