

McSharry Foley Ltd trading as whoops.ie and McSharry Foley

Privacy Notice 25th May 2018

Please read this Privacy Notice 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.

Introduction

McSharry Foley Ltd 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 that you understand your rights as a client.

It is the intention of this Privacy Notice to explain to you the information practices of McSharry Foley Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

Name: McSharry Foley Ltd
Address: Stephen Street, Sligo

When we refer to 'we' it is McSharry Foley Ltd.

Who are we?

McSharry Foley Ltd are Insurance Brokers. We provide advice and arrange contracts of insurance and related transactions on behalf of clients in relation to a wide range of general insurance products, including Motor, Property, Business and Liability Insurance.

Our Data Protection Officer/GDPR Owner and data protection representative(s) can be contacted directly as follows:

Name: Siobhan McSharry
Email: dataprotection@mcsharryfoley.ie
Tel: 0818 946677 (0818 WHOOPS) / 071 9142499

Purpose for processing your data

Why we are processing your data? Our legal basis.

In order for us to provide you with our general insurance broking services we need to collect personal data in order to advise you and arrange any contracts of insurance or related transactions on your behalf with Insurers / Insurance Providers. Our reason (lawful reason) for processing your data under the GDPR is:

Legal basis – McSharry Foley Ltd needs to process your data as this is necessary in relation to a contract of insurance or related

transaction 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 of insurance, with an Insurer / Insurance Provider.

In any event, 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.

How will McSharry Foley Ltd use the personal data it collects about me?

McSharry Foley Ltd 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 endeavour 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:

Explicit consent – 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 provide our Insurance Broker Software System & e-Quote Trading Platform, IT System Support & Maintenance, Offsite Data Backup, Offsite Telephone-call Recording & Backup and Statutory Audit Services 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 fulfil 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 our data protection policy.

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:

- Applied Systems Ireland
- Trojan IT Business Solutions
- Keep it Safe Ireland
- Callmetrics Ireland
- Glacken Accountants

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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

McSharry Foley Ltd facilitates you, our client, rights in line with our data protection policy and 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. McSharry Foley Ltd will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body The Central Bank of Ireland and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by McSharry Foley Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and McSharry Foley Ltd's Data Protection Officer / 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.

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 privacy notice, please contact us on:

Email: dataprotection@mcsharryfoley.ie

Tel: 0818 946677 (0818 WHOOPS) / 071 9142499

Telephone Calls

We record all telephone calls and all follow up calls for verification and training purposes.

Privacy Notice changes

McSharry Foley Ltd may change this privacy policy from time to time at any time without prior notice. When such a change is made, we will post a revised version on our website(s). Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy notice periodically so you're aware of any changes. By using our services you agree to this privacy notice.