

## Privacy Statement

Version 1.0 (January 2024)

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to Life, Mortgage Protection, Pensions, Savings and Investments. We provide our services from the selection of products provided by the Companies we have agencies with. These agencies are Aviva, Irish Life, Zurich and Royal London.

Whitethorn Insurance is committed to protecting and respecting your privacy. We are 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 Whitethorn Insurance in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Whitethorn Insurance Ltd.
- Email: [info@whitethorninsurance.ie](mailto:info@whitethorninsurance.ie)
- When we refer to 'we' it is Whitethorn 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.

Our Data Protection Officer can be contacted directly here:

- Name: Tom Lynch
- Email address: [tom@whitethorninsurance.ie](mailto:tom@whitethorninsurance.ie)
- Phone number: 01 8010917

### Why we process your data

We control your Personal Data to allow us to give you advice and recommendations on your financial planning. Your data is then passed onto the relevant company/companies we have agencies with by way of application forms, by post, email or through their secure websites online.

In order for us to provide you insurance, pension and investment services such as quotations, advice and products we need to collect personal data.

- We will also use your data for related matters such as detection and prevention of fraud, handling complaints and analysis.
- We are committed to ensuring that the information we collect is appropriate for this purpose.
- If you have given us separate marketing consent, we will use your personal data for direct marketing purposes.

When looking for a quote for insurance or other financial products, you will need to provide us information relating to who or what you would like to be covered (e.g. in the case of life insurance, details about you). When buying some financial products, we may need to collect special categories of



data (such as medical history). If you can't provide this information, we will be unable to arrange cover for you.

When submitting an application for a product, you may provide us with information for other persons, such as a proposed second policy holder. You agree that you will bring to the attention of each person named on the policy, this Data Protection Statement at the earliest opportunity.

### **Why are we processing your data?**

In order for us to provide you with insurance and financial services, Whitethorn Insurance need to collect personal data. Our reason for processing your data under the GDPR is:

- Whitethorn 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, Whitethorn Insurance are committed to ensuring that the information collected and used is appropriate for this purpose and does not constitute an invasion of your privacy.

### **How will Whitethorn Insurance use the personal data it collects about me?**

Whitethorn 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 endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

### **Cookies**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to report aggregate information to our advertisers, to record session information and to assist you in answering questions in connection with the quotation process. This may in some instances only be statistical data about how you browse our website.

For the same reason, we may obtain information about your website usage by using a Cookie file, which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computers hard drive. Cookies help us to improve our website and to deliver a better and more personalised service. They enable us to: estimate usage numbers and patterns; to store information about your preferences, and so allow us to customise our website according to individuals interests; to recognise you when you return to our website.

The following cookies are used in the website:

**Google Analytics** – Google Analytics is a free service offered by Google that generates detailed stats about the visitors to a website. We use it to track how users navigate through our website e.g. what pages are performing well/badly, what browsers perform best, the average time a person spends on our website etc.

**Google Adwords** – Google Adwords conversion tracking allows us to determine our best performing adwords campaigns. The conversion tracking involves placing a cookie on a users computer when they

click an Ad. Then if the user clicks on your ad and reaches one of your conversion pages, a successful conversion is recorded.

You may refuse to accept or disable cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of the website or unable to avail of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the website.

[www.allaboutcookies.org](http://www.allaboutcookies.org)

### **Special Categories**

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 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 Whitethorn 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 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 Whitethorn 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:

Pension Trustees, & beneficiaries of Pensions & other Financial Products, Relatives & guardians, (in certain circumstances and within the law) • Employers - past, present, and prospective. • Legal, financial, investment, medical & other professional advisors in the process of submitting your application. • Companies we may outsource some of our services to. • Businesses that refer your business to us. • Any business which we are required by law to share the information with, i.e. compliance resource companies. • Database provider all data encrypted. • The Pensions Authority. • Stockbrokers we have agencies with. • Insurance and Assurance companies we have agencies with. • Investment Companies we have agencies with. • An Garda Síochána. (Anti Money Laundering) • Central Bank of Ireland. We are authorised by the Central Bank, and they have the right to inspect our files. • The Financial Services Ombudsman. In the event of a complaint. • Data Protection Commissioner. • Lenders we have agencies with

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:**

Whitethorn Insurance facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure.

1. Right of access – you have the right to request a copy of the information that we hold about you.
2. Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
3. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
4. Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
5. Right of portability – you have the right to have the data we hold about you transferred to another organisation.
6. Right to object – you have the right to object to certain types of processing such as direct marketing.
7. 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.
8. 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.

### **Retention of your personal data**

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Whitethorn Insurance 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 Whitethorn Insurance or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Whitethorn Insurance's Data Protection officer Tom Lynch.

### **Failure to provide further information**

If we are collecting your data for a contract 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**

#### ➤ Risk Profiling

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

#### ➤ 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. We aim to contact you about products you are likely to be interested in, however you may object to this profiling.

### **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 [info@whitethorninsurance.ie](mailto:info@whitethorninsurance.ie)

### **Privacy policy statement changes**

Whitethorn 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.

Whitethorn Insurance

Regulated by the Central Bank of Ireland C529781