



Privacy Notice/Statement

Introduction

Sparrow Insurances 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 understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of Sparrow Insurances Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- **Sparrow Insurances Ltd**
- Sparrow Insurances Limited, 5 Wesley Terrace, Portlaoise, Co. Laois
- Phone: 057 8688888 Email: Info@sparrowins.ie
- When we refer to 'we' it is Sparrow Insurances Ltd

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?

Sparrow Insurances Limited is a 100% wholly owned Irish Insurance Brokerage with offices based in the midlands, in Portlaoise, Blanchardstown, Nenagh & Thurles. We are members of the Irish Brokers Association and carry Professional Indemnity Insurance.

We endeavor to offer unique and individually tailored Insurance Products for our customers to suit their needs and their wallets.

For over 10 years, we have provided first-rate advice in an industry that is in a constant state of flux & because things are always changing, we believe that it's the people who count.

Our GDPR Owner and data protection representatives can be contacted directly using the below information:

- Grace Callaghan [GDPR Owner]
- info@sparrowins.ie
- Phone number: 057 8688888

Purpose for processing your data

As set out in our Terms of Business the data which you provide to us will be held on a computer database and paper files for the purpose of arranging transactions on your behalf and in order to provide the highest standard of service to you. The data will be processed only in ways compatible with the purposes for which it was given. We may need to collect sensitive personal information relating to you or anyone to be named on your policy or residing in your household to process your application. It is your responsibility to ensure that you have obtained the permission of that person to allow us to process their sensitive personal data as part of your application and to explain our Data Protection policy to them. We may share with insurance service providers' information we hold about you and your claims history. Our product producers may subscribe to Insurance industry databases for fraud prevention purposes. We may also use your information for the purpose of complying with regulatory or legislative requirements, offering renewals, for research/statistical analysis and crime prevention. There may also be requirements to contact you by Email, Post, Phone, SMS Text for the purposes of discussing terms of an existing policy with us or any other query directly relating to an existing policy with us. When you request a quote from us, you may receive a phone call or text message and/or email in relation to that quote.

We would also like to keep you informed of about new or existing insurance, investment products or special offers, and any other insurance related services provided by us which we think may be of interest to you.

Why we are processing your data? Our legal basis.

In order for us to provide you with the service and the insurance product that you require, Sparrow Insurances need to collect personal data. We are a large independent broker providing expert advice and experience to our clients. Sparrow Insurances offers broad based advice in relation to all classes of General Insurance & Life assurance products (whole of life, term cover, serious illness, pensions, savings investments) based on a fair analysis of the market available. The Company in addition transmits orders on behalf of consumers' to insurance undertakings and product producers.

Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** -Sparrow Insurances 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 Sparrow Insurances 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 Sparrow Insurances use the personal data it collects about me?

Sparrow Insurances 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 Sparrow Insurances 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 Sparrow Insurances 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 & Product Providers with who we hold a letter of appointment
- Third-party service providers contracted to Sparrow Insurances
- Insurance industry databases for fraud prevention purposes
- Regulatory or legislative bodies

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.

Right of third party to claim against the insurer under the Consumer Insurance Contract Act 2019.

If you hold insurance against a liability that may be incurred by you against a third party, where for whatever reason you cannot be found or you become insolvent, or the court finds it just and equitable to so order, then your rights under the contract will be transferred to and vested in the third party even though they are not a party to the contract of insurance. The third party has a right to recover from the insurer the amount of any loss suffered by them. Where the third party reasonably believes that you as policyholder have incurred a liability the third party will be entitled to seek and obtain information from the insurer or from any other person who is able to provide it concerning:

- the existence of the insurance contract,
- who the insurer is,
- the terms of the contract, and
- Whether the insurer has informed the insured person that the insurer intends to refuse liability under the contract.

Data Subjects Rights:

Sparrow Insurances 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. Sparrow Insurances will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body and our internal governance.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Sparrow Insurances or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Sparrow Insurances representatives / GDPR Owner.

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

We do not use automated decision making tools, however we will use attitude to risk questionnaires to understand your attitude to risk in respect of Investment products that you may wish to avail of.

If we were ever to use automatic decision making we would advise you accordingly.

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

- Risk Profiling

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

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 Phone: 057 8688888 Email: info@sparrowins.ie

Privacy policy statement changes

Sparrow Insurances 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.

Reviewed September 2020.