

DATA PRIVACY NOTICE

At Assist Insurances Limited trading as BundleBee, Assist Insurances we take data protection seriously and recognise that as a prospective or existing customer, you may have some queries about GDPR (General Data Protection Regulation) and how it impacts your relationship with us. We are committed to ensuring that you have all the information you need to fully understand how and why we process and store your personal data.

This “Data Privacy Notice” sets out the basis upon which we gather, use, process and disclose any personal data we collect about you or that you provide to us. It also applies to third parties whose data you provide to us in connection with our relationship with you (for example, the names of relatives). Please ensure that you provide a copy of this “Data Privacy Notice” to any third parties whose personal data you provide to us.

This notice describes how we collect and use personal data about you in the provision of our services and in the course of our business in accordance with data protection legislation (including the Data Protection Acts of 1998, 2003 and 2018 [“the DPA”], the General Data Protection Regulation [GDPR] effective from 25 May 2018 [“the Regulation”] and any subsequent data protection legislation).

Who we are?

Assist Insurances Limited trading as BundleBee, Assist Insurances provide tailored insurance products to the Irish market and have partnered with some of the world’s leading insurers to deliver innovative customer focused insurance solutions targeted in areas where our expertise resides. Personal interaction and service are key features of our client relationships, and we believe that our products evolve based upon latest market conditions and are backed up by superior levels of customer service and support.

Assist Insurances Limited trading as BundleBee, Assist Insurances is regulated by the Central Bank of Ireland. Our registered company number is 488028. Our registered company address is Unit 11, Westpoint Business Park, Whitemill Industrial Estate, Wexford, Co. Wexford, Y35 F8CY.

Who controls your Personal Data and how can you contact them?

We control your personal data in the provision of our services and in the course of our business. If you do not provide the information we need we may not be able to provide our services to you. The types of personal data processed may include:

- **Individual details** - Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title, employment history and family details, including their relationship to you.
- **Identification details** - Identification numbers issued by government bodies or agencies, including your passport number, your driver’s licence number and Your tax identification number.
- **Anti-fraud details** - Data such as sanctions and criminal information from various anti-fraud and claims databases related to you or any other person to be covered by this policy.
- **Special Categories of Personal Data** - Certain categories of personal data which have additional protection under EU data protection law.
- **Claims Information** - Information about previous or current claims (including other unrelated insurances) which may include data relating to your health (e.g. injuries and pre-existing conditions), relevant criminal convictions or other special categories of personal data mentioned above.

- **Policy Information** - Information about the quotes you receive and policies you take out.

Where we may collect your Personal Data from

- You.
- Companies we have agencies with.
- When you sought a quote from us.
- If you have or had any other contracts of insurance that is not under our agencies. In this instance, we will need a letter of authorisation from you to allow us contact other companies on your behalf.
- When you visit our website www.bundlebee.ie and input data to receive a quote from us.

Whichever of the above sources apply will depend on your circumstances and the product or service you are interested in or your enquiry relates to.

Legal Basis for Processing Your Information

We will only use your personal data for lawful reasons. These are where:

- a) The use is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract (such as providing a recommendation).
- b) The use is necessary to comply with our legal obligations.
- c) You have consented to us using your information in such a way.
- d) The use is necessary for the purpose of our legitimate interests.
- e) The use is necessary for the performance of a task carried out in the public interest such as assisting a regulatory authority's investigation of a criminal offence.

The Purpose of Processing Your Information

- To supply information in respect of and provide quotations in respect of insurance products.
- Disclose data to policyholder, beneficiary, trustee, assignee, successors or to other parties.
- To comply with legal and regulatory requirements including “Anti-Money Laundering” and “Sanctions” compliance.
- To understand how people interact with our websites (if applicable).
- To carry out and determine the effectiveness of advertising and marketing campaigns.

Who we share Your Information with

In providing our services to you we may need to share personal data with various third parties to carry out their regulatory duties as well as fulfilling their contract with you. These third parties may include:

- Your representatives such as a relative, a named individual on the policy, your broker, or any legal representative you may appoint.
- Our own representatives such as appointed legal counsel or third-party services providers for actions such as data storage, fraud detection, credit checking, motor assessors, risk analysis, etc.
- Other individuals, such as third-party claimants and their representatives, other insurance companies, anti-fraud databases (e.g. Insurance Link).
- Government departments, such as An Garda Síochána and the Motor Insurers Bureau of Ireland.
- Product Re-Insurers.

- External auditors, either third party or regulatory bodies i.e. Central Bank of Ireland.
- Companies to whom we may outsource our printing and posting.
- Any businesses which we are required by law to share the information with i.e. compliance resource companies.
- Database providers on the pre-condition that all data is encrypted.
- Insurance companies with whom we have agencies.
- The Financial Services Ombudsman in the event of a complaint.
- The Data Protection Commissioner.

How long do we keep Your Information?

When providing products to you it may be necessary to retain your information for an extended period of time. We keep your information for as long as required by law and for the purpose for which you gave it to us.

As a general rule for legal and best practice reasons we are required to keep your information for 6 years after the date on which our relationship with you ends.

Automated/Profiling Decision Making

Assist Insurances Limited trading as BundleBee, Assist Insurances uses automated decision making when quoting for you by using information provided by you. We use automated software to review and calculate premiums for risk profiles based on information provided to us which allows for the fast tracking of accepting or declining risks based on the information provided. Where an automated decision-making process is in place you are entitled to query the process to ensure that all information provided is correct and the quote provided (if any) is fair.

Customer Rights

As a data subject you are entitled to:

- Withdraw your consent at any point where we are processing data belonging to you.
- Request a copy of the data that we hold about you and the reasons we process this data.
- Request that data concerning you be updated or corrected if inaccurate. Note that you are required to update us on any changes to the material facts of the policy.

Further Rights Provided by GDPR

Assist Insurances Limited trading as BundleBee, Assist Insurances facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. At any point while we are in possession of or processing your persona data you, the data subject, have the following rights as and from **25th May 2018**:

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 Erasure

Data subjects may request that all personal data related to them be removed from our systems where the data has been held for longer than necessary or if the processing is not in compliance with regulation.

Right to Data Portability

Data subjects may request that all personal information be copied and transferred to another company in a readable and functional format.

Right to Object

You have the right to object to certain types of processing such as direct marketing.

Right to Restriction of Processing

A data subject may request to restrict the processing of data that they feel is inaccurate, processed unlawfully, that is irrelevant to the contract or have invoked their right to object.

Right to Object to Automated Decision Making including Profiling

A data subject may request to not have decisions made on the processing of their data solely based on an automated electronic process without any human intervention.

Right to Judicial Review

In the event that we refuse 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.

Right to Make a Complaint

If you are dissatisfied about the way we handle your personal data please contact us. We will do our best to address your concerns swiftly and resolve any issues you may have.

You also have the right to complain to:

The Office of The Data Protection Commission
Canal House
Station Road
Portarlinton
Co. Laois
R32 AP23
Tel.: +353 (0)76 110 4800
Fax: +353 (0)57 868 4757
Website: www.dataprotection.ie
E-Mail: info@dataprotection.ie

Recommendations against Fraud

In accordance with its “Privacy Policy”, Assist Insurances Limited trading as BundleBee, Assist Insurances wants the users of its websites www.bundlebee.ie and www.assistinsurances.ie to have control of their personal information. To this end, Assist Insurances Limited trading as BundleBee, Assist Insurances does not ask the user for their password or access code or PIN (personal identification number) by email. Only if a user decides to contact us by email would we receive such data, which will include, in any case, their email address and, additionally, data which the user enters in the text of the sent email.

If you have been the victim of an attack, fraud or attempted fraud and have provided information report it to An Garda Síochána.

The regulations on Telecommunications and Information Society Services attributes protection of the rights and guarantees of users in the field of electronic communications to the Data Protection Commission. Among such attributions is the defence of privacy of internet users against spam.

Update of the Privacy Policy

This “Privacy Policy” may need to be updated from time to time. It is therefore necessary that you review this policy periodically and, if possible, every time you access the websites www.bundlebee.ie and www.assistinsurances.ie in order to be properly informed about the type of information collected and its processing.

