

## **Staycationcover.ie Privacy Policy**

### **About Us**

Staycationcover.ie is a trading name of Accident & General Insurance Services Limited. Accident & General Insurance Services Ltd is regulated by the Central Bank of Ireland for insurance mediation services, Reg No: C8954. Our company registration is 146193 at 6 Leopardstown Office Park, Burton Hall Avenue, Sandyford, D18.

### **Data Protection**

We are committed to complying with data protection laws and respecting your personal information when you use our website and our services. From 25th May 2018 the laws applicable are the General Data Protection Regime (GDPR) and The Irish Data Protection Act 2018 (DPA).

This Privacy Policy describes what personal information we may collect from you, why we use your personal information, and more generally the practices we maintain and the ways in which we use your personal information.

By providing your personal information to us, you acknowledge that we may use it in the ways set out in this privacy policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information. We may also give you the opportunity to opt-in or opt-out of selected uses such as marketing when we collect your personal information.

If you are registering other people for cover under a policy where you are the key contact, and are providing personal information about these individuals, you must ensure that this privacy policy has been drawn to the attention of those individuals and you have permission to share information with us. Where the individual is under the age of 16 years, you must ensure that you have parental consent to provide personal information relating to the child to us.

From time to time we may need to make changes to this privacy policy, for example, as the result of government regulation, new technologies, or other changes in data protection laws. You should check the Staycationcover.ie website periodically to review the most up to date privacy policy.

### **Data Controller and Data Processor**

Accident & General Insurance Services Limited are the data controller and data processor under the GDPR and DPA in relation to the controlling and processing of your personal data in connection with our Insurance Services.

As the data controller we will share your personal details with any insurance providers we work with in order to provide your quote.

We are responsible for complying with data protection laws. If you have any queries relating to our use of your personal data or any other related data protection questions, please contact our Data Protection Officer at DPO [dpo@staycationcover.ie](mailto:dpo@staycationcover.ie) or by writing to our Data Protection Officer, staycationcover.ie, 6 Leopardstown Office Park, Sandyford Industrial Estate, Dublin 18.

### **Who do we collect personal information about?**

- Present, past and prospective clients
- Individuals who enquire about our organisation and its services
- Individuals that sign up to marketing communications and service updates.

### **When do we collect personal information?**

We may gather, store and use the following kinds of personal data:

- information that you provide to us for the purpose of obtaining a quote, (and wish your quote details to be saved)- or purchasing an insurance policy via our platform (including your name and address, telephone and email contact details);
- information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type, referral source, length of visit and number of page views);
- information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters (including your name and address, telephone and email contact details);
- any other information that you choose to send to us.

### **What personal information do we collect?**

- Name;
- Email address;
- Phone number;
- Email address;
- Date of birth
- IP address
- Financial information (i.e. credit or debit card details for premium payments)
- We may also collect the following sensitive personal information;
  - Children's personal data (if travelling with you and insured under your policy)

### **How do we collect your personal information?**

- By telephone;
- Via call recordings on our voice message service;
- Via our website (including through the use of Cookies – please see section later on Cookies);
- Via registration forms on our website;
- From individuals who have registered you for a policy;
- From third parties you have introduced you to us.

## **How we will use your personal data**

Personal data will be used for the purposes specified in this privacy policy or in relevant parts of the website.

Your personal information may be used to:

- provide a quote and send you email confirmation of this at your request
- issue policies, maintain your policy or send to you renewal terms for your policy via email and if requested via post
- send you email notifications which you have specifically requested;
- deal with enquiries and complaints made by or about you relating to the website;
- Provide on request your quote information to your insurers nominated claim handler in relation to your policy or a claim;
- analyse customer demographics to customise and develop the product/services we offer

Where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

## **Legal grounds under which we process your personal and sensitive data, we use your personal information for a number of different purposes.**

Under data protection law, for each purpose we must be able to rely on a legal ground to justify why we are using your personal information.

Issuing a quote and/or issuing and managing your policy with Staycationcover.ie

The processing of your personal and sensitive personal data is necessary for the performance of the insurance contract to which you are a party to, or in order to take steps at your request to provide you with a quote prior to entering into an insurance contract.

The legal grounds under which we process your data in these circumstances are to enable the fulfilment of the performance of our contract with you, and for compliance with legal obligations to which we are subject.

Keeping you informed of new services/updates on products/provision of information on a subject you have asked to be kept informed of/specific marketing materials with you implicit consent.

The processing of your personal data and sensitive personal data will only be undertaken upon receiving your explicit legal consent for the specific activity. You will be asked for your consent via our website or over the phone or via email or in writing. We will not send any information to you if you have not explicitly consented to receive this.

You may withdraw your consent at any time by contacting us, by clicking on the email unsubscribe link or by writing to The Head of Marketing at staycationcover.ie 6 Leopardstown Office Park, Burton Hall Avenue, Sandyford, D18. If you do so, you may not be able to receive the benefit of some of our services where in order to provide them, we rely on your explicit consent to process your personal data.

The processing of your personal data for the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of your personal information.

### **How long will we retain your personal information?**

We only keep your personal information for as long as it is reasonably necessary, or is legally required by the Central Bank of Ireland (CBI) to fulfil the relevant purposes described in this privacy policy or if required by law we may keep your information for longer. For instance, under the consumer protection code, we are required to retain an accurate record of dealings with us for the last 6 years after your last interaction with us, so we can respond to any complaints or challenge you or others might raise later. We will also retain files if we reasonably believe there is a prospect of litigation.

If you consent to your personal information being retained for the purposes of a quote, we will retain your information only for the valid period of that quote if you subsequently decide not to purchase a policy with us. The quote expires once the original inception date has passed.

### **What will we disclose to third parties?**

- If you request a quote you consent to us disclosing your personal information to the following parties:
- If you purchase a product we will share your personal information with your chosen insurer of the policy.
- In the event of a claim, your personal information will be shared with the insurer and their appointed claims administration provider and/or emergency assistance company as is required to process the claim. Details of these organisations are stated in the respective policy terms and conditions.
- Other third parties whose products or services are included on our website with a view to providing you with a quotation or policy information for their product and/or a service requested by you. When these companies use your data in this way, they will be acting as data controllers of your information and therefore you should view their privacy policies or contact them directly for further information.
- The Central Bank of Ireland and/or other regulatory/governing bodies for the purposes of compliance monitoring;
- Your information may be shared in connection with the sale or potential sale of all or part of our business or the company. You will be sent notice of such an event.
- Staycationcover.ie reserves the right to disclose personally identifiable information in order to comply with the law, applicable regulations and government requests. We also reserve the right to use such information in order to protect our operating systems and integrity as well as other users.
- Any third parties employed by us to process your data on our behalf are subject to contractual obligations to protect the security of your data in accordance with the terms of this Privacy Policy.

## **How do we protect your information?**

Once we have received your data we will ensure that it is treated with the utmost respect and in accordance with the GDPR, DPA and any applicable regulations. Your data will be stored on our secure server within the EU. We follow strict security procedures in order that the data we collect is stored and disclosed appropriately and securely.

Unfortunately, the transmission of information via the internet is not completely secure. Although Staycationcover.ie will do its best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

## **Other Websites**

Please note that clicking on links and advertisements on our websites may result in your transferral to another website, where data privacy practices may vary to that of Staycationcover.ie. If transferred to another website, you should consult their privacy policy as we are not responsible for and have no control over information that is submitted to or collected by these third parties.

## **Your Rights**

### **The right to access your personal information**

Subject to any relevant exemptions, you are entitled to see a copy of the personal information we hold about you and to request details of how we use your personal information including any disclosures made. To exercise your rights to access your personal information please contact our Data Protection Officer at DPO [dpo@staycationcover.ie](mailto:dpo@staycationcover.ie) or by writing to our Data Protection Officer, Staycationcover.ie, 6 Leopardstown Office Park, Sandyford Industrial Estate, Dublin 18. There will not normally be a charge for dealing with these requests.

Your personal information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case your personal information will be provided to you by electronic means where possible.

We will require you to provide;

- Your full name
- 2 Identification documents i.e. copy of recent utility bill or bank statement and passport or photo driving licence

### **The right to rectification**

We take reasonable steps to ensure that the personal information we hold about you is reliable and as accurate and complete as is necessary for its intended use, but you are entitled to ask us to update or amend any inaccuracies in the personal information that we hold about you. To request us to update or amend any personal information we hold about you, please contact our Data Protection Officer at DPO [dpo@staycationcover.ie](mailto:dpo@staycationcover.ie) or by writing to our Data Protection Officer, Staycationcover.ie, 6 Leopardstown Office Park, Sandyford Industrial Estate, Dublin 18.

### **The right to object to marketing**

As set out in the section on marketing, you are entitled to object to receiving marketing material from us at any time. You can exercise this right by clicking 'unsubscribe' on any marketing email you receive from us or by contacting our Data Protection Officer at DPO [dpo@Staycationcover.ie](mailto:dpo@Staycationcover.ie) or by writing to our Data Protection Officer, Staycationcover.ie, 6 Leopardstown Office Park, Sandyford Industrial Estate, Dublin 18.

### **The right to be forgotten**

You are entitled to request that any personal information that we no longer have a legal ground to rely on be removed. You can exercise this right by clicking 'unsubscribe' on any marketing email you receive from us or by contacting our Data Protection Officer at DPO [dpo@ Staycationcover.ie](mailto:dpo@Staycationcover.ie) or by writing to our Data Protection Officer, Staycationcover.ie, 6 Leopardstown Office Park, Sandyford Industrial Estate, Dublin 18.

### **The right to change your consent wishes**

Where processing is based on consent, you are entitled to withdraw your consent so that we stop that particular form of processing. You can exercise this right by clicking 'unsubscribe' on any marketing email you receive from us or by contacting our Data Protection Officer at DPO [dpo@ Staycationcover.ie](mailto:dpo@Staycationcover.ie) or by writing to our Data Protection Officer, Staycationcover.ie, 6 Leopardstown Office Park, Sandyford Industrial Estate, Dublin 18.

### **The right for data portability**

You are entitled to request that we provide to you or another provider with a copy of your personal information that you provided us with. You can exercise this right by clicking 'unsubscribe' on any marketing email you receive from us or by contacting our Data Protection Officer at DPO [dpo@ Staycationcover.ie](mailto:dpo@Staycationcover.ie) or by writing to our Data Protection Officer, Staycationcover.ie, 6 Leopardstown Office Park, Sandyford Industrial Estate, Dublin 18.

### **Your right to complain**

If you are not satisfied with our use of your personal information, our response to your exercised rights, or if you believe us to be in breach of our data protection obligations, you have the right to complain to the Office of the information commissioner (OIC).

## **COOKIES**

### **What is a cookie?**

A cookie is a small text file that we, and in certain circumstances third parties, place on your browser when you visit our websites or open some of our emails.

Cookies, amongst other things, allow Staycationcover.ie to recognise you each time you re-visit one of our websites and provide you with a more personalised user experience. There are in existence a variety of different cookies which are designed for use in specific sets of circumstances.

### **How do we use cookies?**

Cookies may also be used to track your use of Staycationcover.ie to better develop the website, for example, determining which parts of the website are more popular and determining content accordingly.

### **How to manage or refuse cookies**

If you do not want your browser to accept cookies and use them in the ways described above it is possible to change your browser settings. It is also possible to delete existing cookies from your browser. However, blocking all cookies will affect your web experience and may result in some parts of Staycationcover.ie not functioning properly.

Some cookies are designed to help save you time, for example, by remembering your contact details when you are making an order for the second time this means that you will not have to complete the contact section again unless your details have changed. The procedure for modifying your privacy preferences is different for each internet browser and we recommend you visit the following websites for further information on altering your cookie settings:

- <http://www.aboutcookies.org>
- [www.allaboutcookies.org](http://www.allaboutcookies.org)

For more detailed information on how to clear or disable all of your browser cookies, please visit; <http://www.google.com/support/accounts/bin/answer.py?answer=32050&hl=en>

### **Changes to our privacy policy**

Staycationcover.ie keeps this privacy policy under review and may update it at any time. Any updates will be made on this page so that you can always find out what information we collect, how we use it and under what circumstances we will disclose it.

### **How to contact us**

If you have any queries relating to the Staycationcover.ie privacy policy please contact us by writing to Data Protection Officer, Staycationcover.ie, 6 Leopardstown Office Park, Sandyford Industrial Estate, Dublin 18.

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