

Privacy Statement

Introduction

Apex Insurance Brokers 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 Apex Insurance Brokers in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Apex Insurance Brokers
- Contact details of Apex Insurance Brokers , 58 South Mall, Cork City.
- When we refer to 'we' it is Apex Insurance Brokers

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?

Apex Risk Advisors t/a Apex Insurance Brokers is a leading privately held firm of Insurance Brokers, founded in 2011. As an independent firm we are conflict free and manage our business with integrity and focus on creating long term value for our clients.

Our data protection representatives can be contacted directly here:

- Marie O'Keeffe
- info@apexinsurance.ie
- +353 21 2398864

• APEX Insurance Brokers,
• 58 South Mall,
• Cork,
• Ireland

• **T** 021 239 8864
• **F** 021 239 9204
• **W** www.apexinsurance.ie
• **E** info@apexinsurance.ie

the right cover
at the right price



Information we may collect from you

We may collect and process the following data about you:

- **Information you give us.** We will receive personal information about you, when you contact us for example by requesting or obtaining a quote. The information could include:

Identification details ► Identification numbers such as driving licence number / passport details.

Financial information ► Bank account or payment card details, income or other financial information.

Risk details ► Information about you (and others insured under the policy) which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to health, criminal convictions, or other special categories of personal data (see below).

Policy information ► Information about the quotes you receive and policies you take out.

Credit and anti-fraud data ► Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you.

Previous and current claims ► Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data (see below) .

Other application forms requesting further information that are necessary for us to provide you with a potential quote, product or service or a renewal, postponement or cancellation of a product or service or otherwise as the case may be in the course of business dealings with you, whether you are a potential, a returning or an existing customer.

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 to obtain your explicit consent

We will only use the information you give us for the purposes described in this policy.

By going ahead with an Apex Insurance Brokers quote or otherwise submitting personal information including sensitive personal information, as applicable, you will be explicitly agreeing to us, our agents, other insurers and any and all other persons who may be involved in the processing of your information for all purposes relevant from time to time to your relationship with Apex Insurance Brokers.

How and why we use this information

We will process any personal data lawfully under one or more of the following bases:

- **Performance of a Contract:** the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Compliance with a Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations).
- **Legitimate interests:** the processing is necessary for our legitimate interests pursued by us. In such cases our legitimate interests are as follows:
 - To add value to your product by offering you other general insurance products
 - To provide excellent service to our customers by ensuring they are fully informed about all of our products.
 - To engage in activities to improve and adapt the range of products and services we offer and to help our business grow
- **Consent:** where you have given clear consent for us to process your personal data for a specific purpose. In circumstances where we need your consent to process data we will make this clear, unambiguous and you will have to pro-actively agree to the processing. We can seek your consent within a written or electronic document or verbally. Where processing is based on consent, you can withdraw your consent to processing at any time so that we stop that particular processing.
- In any event, Apex Insurance Brokers 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 we share this information

In using personal data for the above purposes, we will disclose personal data to third parties including insurers, reinsurers, intermediaries or other brokers; outsourcers, sub-contractors, agents and service providers; claim handlers; premium finance providers; professional advisers and auditors. Third parties to whom we disclose personal data are required by law and contractual undertakings to keep personal data confidential and secure, and to use and disclose it for purposes that a reasonable person would consider appropriate in the circumstances, in compliance with all applicable legislation.

We may share and aggregate information about you, including personal information relating to other policies held with us, quotes or claims details and, we may use this information to:

- help us identify products and services that could be of interest to you, to tailor and package our products and services; to determine pricing and/or offer available discounts; and
- conduct customer research and develop marketing campaigns.

We and/or other parties to whom we disclose personal data, may use your information for purposes such as statistical and trend research and analysis which might include computerised processes which profile you.

Automatic profiling helps firms to understand,

the right cover at the right price



predict and forecast customer preferences and to improve the products and services they offer and to assess which products might be most suitable for you

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If Apex Insurance is or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of business, www.apexinsurance.ie/terms and other agreements; or to protect the rights, property, or safety of Apex Insurance our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- 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.

Retention of your personal data

- We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under this insurance, or where we are required to keep your personal data due to legal or regulatory reasons.
- We will endeavour to keep your information accurate and whenever you inform us about any changes we will update this information at the earliest opportunity. Please help us to do this by letting us know whenever there are changes to your personal data. If you are providing information about someone else you confirm that they have appointed you to act for them, to consent to the processing of their personal data including special categories of personal data and that you have informed them of our identity and the purposes (as set out in this Privacy Policy) for which their personal data will be processed.

Data Subjects Rights:

Apex Insurance Brokers 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

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Apex Insurance Brokers or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Apex Insurance brokers data protection representatives Data Protection Officer / 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.

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 (021) 2398864 or email iinfo@apexinsurance.ie

Privacy policy statement changes

Apex Insurance Brokers 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.

This privacy policy was last reviewed in May 2018