

William Lyons Insurances Ltd t/a Lyons Insurance & Investment Brokers

Privacy Statement

Introduction

William Lyons Insurances Ltd t/a Lyons Insurance & Investment 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 Lyons Insurance & Investment Brokers in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Denis Lyons
- Contact details - Lyons Insurance & Investment Brokers, 113 Main Street, Castleisland, Co Kerry
- When we refer to 'we' it is Denis Lyons

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?

- Lyons Insurance & Investment Brokers are Insurance Brokers and Financial Consultants. Our principal business is to provide advise and arrange transactions on behalf of you our clients in relation to General Insurance, Investments, Life Assurance, Deposits, Life and Pension products and Health Insurance.


Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Denis Lyons
- Denny @lyonsins.ie
- 066 7141268 / info@lyonsins.ie

Purpose for processing your data

- We collect your personal data for onward transmission to product producers to facilitate the arrangement of products to suit your requirements. We hold contracts with all the product producers that we deal with. All these contracts are being updated to state that they are GDPR compliant.
- The personal data we collect may include your name, address telephone number, email address, date of birth, occupation, ID documentation, PPS Number, insurance requirements including details about your home or vehicle, claims history, employer details(where necessary), drivers licence details, bank account details or payment card details, marital status, criminal convictions and for motor Insurance, penalty points, road traffic offences. We may also collect Special Categories of personal Data ie Health Data
- Your data is stored securely on site by us in paper files and computers which are password protected. Our IT systems are backed up daily and are stored off site. We also have contracts with the companies that arrange our back up. These contracts have also been updated to state that they are GRDP compliant.

Why we are processing your data? Our legal basis.

In order for us to provide you with Insurance and Financial services, Lyons Insurance & Investment Brokers  need to collect personal data. Our reason (lawful) for processing your data under the GDPR is:

- Legal basis – Lyons Insurance & Investment Brokers needs to process your data as this is necessary in relation to a contract of insurance to which you have entered into or because you have asked for something to be done so you can enter into a contract of Insurance or Financial service.

In any event, Lyons Insurance & Investment 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 will Lyons Insurance & Investment Brokers use the personal data it collects about me?

Lyons Insurance & Investment Brokers 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.

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 provide your data to product producers and financial institutions with whom we hold an agency to transact business with.

We may pass your personal data on to third-party service providers contracted by Lyons Insurance & Investment Brokers 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 their procedures.

If we wish to pass your sensitive personal data on to 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:

- General Insurance Companies
- Financial Institutions
- Life insurance Companies
- Health Insurance Companies

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.

Consumer Insurance Contracts Act 2019-Right of third party to claim

(General Insurance only)

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 vest 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

We take steps to ensure that any third-party who handles your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf.

Data Subjects Rights:

Lyons Insurance & Investment Brokers facilitate your, 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 Lyons Insurance & Investment Brokers 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.

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 Lyons Insurance & Investment Brokers 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 Lyons Insurance & Investment Brokers or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Lyons Insurance & Investment Brokers data protection representatives.

Failure to provide further information

If we are collecting your data for a contract x 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

a) Risk Profiling

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

b) 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.

a) Establishing affordability and providing quotations for financial services products.

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 087 2384018 or email info@lyonsins.ie

Privacy Policy statement changes

Lyons Investment & Insurance Brokers may change this privacy statement from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the date on which they are posted. It is your responsibility to review this privacy statement periodically so you're aware of any changes. By using our services you agree to this privacy policy.