

Privacy Notice/Statement – CFM Group Limited

Introduction

City Financial Marketing Group Ltd T/A CFM Group, Insuremyvan.ie, Insuremyhouse.ie, Coverinaclick.ie, Insuremycars.ie, Insuremyshop.ie, Insuremyholiday.ie and Lifebroker.ie is regulated by the Central Bank of Ireland. CFM Group Limited (hereafter CFM Group) 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 CFM Group in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- CFM Group Limited trading as outlined above
- Located at 62A Terenure Road North, Terenure, Dublin 6W DW6 CF54
- When we refer to 'we' it is CFM Group

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?

CFM Group is a 100% Irish owned Insurance Broker operating in Terenure, Dublin 6W. CFM Group staff are experts in van, motor, travel, home, commercial and life products. CFM group offer quotations, advice and policies for clients to fit their needs and employs over 80 staff to deal with all our clients.

Our GDPR representative can be contacted directly here:

- Elaine Maher
- gdp@cfmgroup.ie
- 01 660 6900

Purpose for processing your data

- To provide insurance quotations to potential clients
- To advise clients and potential clients of their insurance needs and requirements
- To deal with claims on behalf of our clients and provide ongoing insurance support and advice

May 9th 2018



Why we are processing your data? Our legal basis.

In order for us to provide you with insurance policy quotations CFM Group need to collect personal data for the purpose of providing you with insurance quotations and incept policy cover on your instruction. Our reason (lawful reason) for processing your data under the GDPR is:

- **Legal basis** – CFM Group 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. City Financial Marketing Group Ltd trades as CFM Group, Insuremyvan.ie, Insuremyhouse.ie, Coverinaclick.ie, Insuremycars.ie, Insuremyshop.ie, Insuremyholiday.ie and Lifebroker.ie and provides quotations, advise and policies on a range of non life insurance products including home, motor, commercial vehicle, travel, commercial insurance policies and life cover.

In any event, CFM Group 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 CFM Group use the personal data it collects about me?

CFM Group 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 prior to collecting such data
- Please note in order for us to provide insurance quotations we must ask questions in relation to convictions and prosecutions pending.

Who are we sharing your data with?

CFM Group (including all trading names above mentioned) is a regulated insurance intermediary appointed by insurance companies to provide clients with quotations and policies of insurance. We collect data required for the provision of contract terms and this information is shared with our insurance company and underwriting partners who provide the insurance premium for the risk being proposed to them.

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We may pass your personal data on to third-party service providers contracted to CFM Group 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 CFM Group procedures. In certain cases where you the client appoint a third party to act on your behalf (loss assessors for example) we will share data with them on your written request to do so.

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.

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.

Data Subjects Rights:

CFM Group facilitates you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request. For any GDPR related queries please email our appointed representative Elaine Maher – gdpr@cfmgroup.ie

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 CFM Group 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.

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Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. CFM Group 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 CFM Group or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and CFM Group's GDPR appointed Representative Elaine Maher gdpr@cfmgroup.ie

Failure to provide further information

If we are collecting your data for an insurance contract/ quotation and you cannot provide this data the consequences of this could mean the contract cannot be completed, quotation cannot be provided or details are incorrect.

Profiling – automatic decision making

As an insurance broker we will use profiling in our business. The main categories of profiling used in CFM Group are:

- a) 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.

- b) Establishing affordability and providing quotations for insurance services

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 and Updates to this Notice

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 01 660 6900 Elaine Maher gdpr@cfmgroup.ie

This notice will be reviewed annually to ensure compliance with the GDPR and in line with all our policies and procedures.

May 9th 2018

