



## DEVLIN BOLAND O'TOOLE INSURANCES LTD

*General & Life Insurance • Pensions • Investments*

Suite 2, The Avenue, Beacon Court, Sandyford, Dublin 18  
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# Privacy Statement

## Introduction

Devlin Boland O'Toole Insurances Limited 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 Devlin Boland O'Toole Insurances Limited in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Devlin Boland O'Toole Insurances Limited
- When we refer to 'we' it is Devlin Boland O'Toole Insurances Limited

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?

Devlin Boland O'Toole Insurances Limited is regulated by the Central Bank of Ireland as an Authorised Advisor. We are authorised to offer broad-based advice in relation to all classes of life assurance products (Life Assurance policies, Income Protection, Pensions, Savings and Investments, Personal Retirement Savings Accounts) and also in relation to non-life insurance; Personal (Motor, Property, Travel, Marine etc) and Commercial (Office, Liability, Professional Indemnity, Property Owner, Retail etc.).

Our GDPR Owner and data protection representatives can be contacted directly here:

- [dataprotection@dbot.ie](mailto:dataprotection@dbot.ie)
- 01-2911811

## How we collect information about you

We collect personal information from you, for example by:

- Direct conversation/email following a quotation enquiry.
- From fact finds/ proposal forms that we forward to you electronically or via post.
- Our phone calls are recorded for data protection and training purposes.

## Purpose for processing your data

- We gather your personal information and will share this data with product providers for quotation purposes only.

If we are collecting your data for a contract/quotation purposes and you cannot provide complete or accurate information, the consequences of this could mean the contract cannot be completed or details are incorrect.

## Why we are processing your data? Our legal basis.

For us to provide you with a quotation for your desired insurance product, Devlin Boland O'Toole Insurances Limited need to collect personal data. Our lawful reason for processing your data under the GDPR is as follows.

To use your information lawfully, we rely on one or more of the following legal bases:

- your consent;
- performance of a contract;
- legal obligation (e.g. "Minimum Competency Code", "Fitness & Probity", TCA 1997);
- protecting the vital interests of you or others;
- public interest; and
- Our legitimate interests or the legitimate interests of a third party (e.g. your employer).

We are relying on contract. If we contact you for direct marketing we will rely on either consent or legitimate interest.

## How will Devlin Boland O'Toole Insurances Limited use the personal data it collects about me?

Devlin Boland O'Toole Insurances Limited 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. To provide our products and services under the terms and conditions we agree between us, we need to collect and use personal information about you. If you do not provide this personal information, we may not be able to provide you with our products and services.

## 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 that we obtain your explicit consent.

## Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Devlin Boland O’Toole Insurances Limited 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 Devlin Boland O’Toole Insurances Limited procedures.

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.

The third parties that we pass your personal data to are:

- Product Providers
- Finance Companies
- Central Bank
- IT & Security Services
- Call recording Services
- Revenue
- CRM Providers
- Accountant Services

We have issued all our Third Party Processors with a Data Processor Agreement and Checklists.

## Data Subjects Rights:

Devlin Boland O’Toole Insurances Limited facilitates 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.

Once you make a data request, we may ask you to verify your identity in order to protect your information. We have a responsibility to respond to data requests within 30 calendar days from receipt of request. You have the right for your information to be correct within 10 calendar day. This may be extended in exceptional circumstances in which you will be informed accordingly.

## Retention of your personal data

How long we hold your information depends on the nature of the information and the purposes for which it is processed. We determine appropriate retention periods which meet our legal, business and regulatory obligations.

We hold your information while you are a client or prospective client and for a period of time after that. We do not hold it for longer than necessary. If the purpose for which the information was obtained has ceased and the personal information is no longer required, the personal data will be deleted

## How we keep your data safe

We use technical and organisational measures to protect your personal information from unauthorised access, to maintain data accuracy and to help ensure the appropriate use of your personal data.

## Complaints

If you have a complaint about the use of your personal information, you may do so in writing and by email to [dataprotection@dbot.ie](mailto:dataprotection@dbot.ie). Please be assured that all complaints received will be fully investigated. You may also contact the Data Protection Commission in Ireland to lodge a complaint;

Data Protection Commission  
 Canal House,  
 Station Road,  
 Portarlinton,  
 Co. Laois, R32 AP23  
 Phone: + 353 57 868 4800 / + 353 761 104 800  
 Fax: + 353 57 868 4757  
 Web: [www.dataprotection.ie](http://www.dataprotection.ie)  
 Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

## Profiling – automatic decision making

- Marketing Purposes;

When we seek to contact you about other services, we run automated queries on our computerised data base to establish the suitability of proposed products or services to your needs.

- Quotation Purposes;

When using your information for quotation purpose, we may input your data into our Product Providers automatic quotation 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.

## Privacy policy statement changes

Devlin Boland O’Toole Insurances Limited reserve the right to amend and update this policy at any time. Our most recent version of this policy can be found on our website, [www.dbot.ie](http://www.dbot.ie) . It is your responsibility to ensure you are familiar with any amendments that may have been made. By using our services you agree to this privacy policy.

This privacy policy was last reviewed in November 2018