

Privacy Statement

General Data Protection Regulation (GDPR) Notice

CUIS Financial Services DAC t/a Peopl.

At Peopl we are committed to keeping your privacy and information safe. We respect the trust you've placed in us, and this Notice is a copy of our policy around how we do this.

Our privacy notice tells you what we do with information we collect about you. It's relevant to anyone who uses our services, including policyholders, prospective policyholders, our partners and visitors, our website users and beneficiaries under our policies.

It is the intention of this privacy statement to explain to you the information practices of Peopl in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Peopl
- Located at 511, The Capel Building, Mary's Abbey, Dublin 7, D07 FK22 Ireland
- When we refer to 'we' it is Peopl.

Who are we?

Peopl is a 100% Irish owned Insurance Broker regulated by the Central Bank of Ireland. Peopl staff are experts in home and travel products. Peopl group offer quotations, advice and policies for clients to fit their needs.

The controller (as defined in the GDPR) of your personal data for all purposes outlined in the policy is Peopl. We can be contacted by post at 511 The Capel Building, Mary's Abbey, Dublin 7, D07 FK22, Ireland, by telephone at 01 5533580 or by email at insurance@peopl.ie. Our Data Protection Owner can provide you with additional information on this policy and your rights.

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 provide ongoing insurance support and advice.

Why we are processing your data? Our legal basis.

In order for us to provide you with our services Peopl 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

– Peopl 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. Peopl provides quotations, advice and policies on a range of non-life insurance products including home and travel insurance.

In any event, Peopl 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 CUIS Financial Services DAC t/a Peopl use the personal data it collects about me?

Peopl 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 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?

Peopl 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.

We may pass your personal data on to third-party service providers contracted to Peopl 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 Peopl 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:

Peopl 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 at insurance@peopl.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
- **Right to judicial review** - in the event that Peopl 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.

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Peopl 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 Peopl or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Peopl Data Protection Owner.

You may also lodge a complaint with the Data Protection Commission in Ireland, whose details are:

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
Email: info@dataprotection.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 Peopl 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

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact our Data Protection Owner on 01 5533580, email: insurance@peopl.ie.

Privacy policy statement changes:

Peopl 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 September 2019.

CUIS Financial Services DAC trading as Peopl is regulated by the Central Bank of Ireland with Registration No.647175 and registered offices at 511 The Capel Building, Mary's Abbey, Dublin 7 Tel: 01 5533580

E: insurance@peopl.ie