

Privacy Statement

Introduction

Aiken Insurances Ltd 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 Aiken Insurances Ltd in relation to the information we collect about you.

For the purposes of the GDPR the data controller is:

- Aiken Insurances Ltd
- Contact us on + 353 1 6672644 or cara.aiken@aikenco.ie
- When we refer to 'we' it is Aiken Insurances Ltd

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?

Aiken Insurances Ltd is one of Ireland's leading Insurance Broking firms operating in both the retail and wholesale commercial insurance broking sectors. We are a part of the NFP group of companies.

We have successfully operated in specialist sectors including but not limited to Professional Indemnity/Directors and Officers Liability Insurance, Complex Commercial Liability and Property Risks including Unoccupied Property as well as the Leisure & Entertainment and Construction sectors.

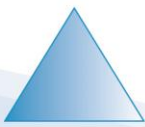
We are Lloyds Coverholders and members of Brokers Ireland.

Our Compliance Officer / GDPR Owner can be contacted directly here:

- Name - Cara Aiken
- Email - cara.aiken@aikenco.ie
- Phone - + 353 1 6672644

Purpose for processing your data

- *In our capacity as insurance brokers and Lloyds Coverholders, your data will be passed to third party brokers and insurers in order to obtain the best possible insurance terms for you, our client.*
- *Relevant personal information as well as risk information including claims history will be gathered by way of risk submission form and Proposal forms*



- *This is to make sure the individual knows exactly what is going to happen to their information and how it is going to be used. You shouldn't be doing anything with personal data unless the individual is made aware*

Call Recording – We record incoming and outgoing phone calls for training, quality and verification purposes.

Other peoples data- As well as collecting personal information about you, we may use personal information about other people, e.g. family members you wish to insure on a policy. If you are providing information about another person, we expect you to show them this Privacy Notice and ensure that they have given you permission to provide this information to us so that a quote can be provided. If they have any concerns, they can contact the GDPR Owner as per contact details above.

Why we are processing your data? Our legal basis.

In order for us to provide you with insurance products and services Aiken Insurances Ltd need to collect personal data. Our reason for processing your data under the GDPR is:

- **Legal basis** - Aiken Insurances Ltd 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.

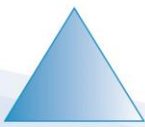
We will disclose personal data for the purposes we explain in this notice to service providers, contractors, advisers, agents and third parties that perform activities on our behalf.

In any event, Aiken Insurances Ltd 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.

Withdraw Consent- Where you have provided consent this can be drawn any time by email us at cara.aiken@aikenco.ie or write to us.

How will Aiken Insurances Ltd use the personal data it collects about me?

Aiken Insurances Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We have set up the Standard Contractual Clauses which we rely on as an adequate data transfer mechanism should your information need to be processed in the UK or USA as part of our group interactions. Such processing will only occur where necessary in the provision of our services. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary required under applicable legislation and regulation. -



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?

Aiken Insurances Ltd are required to share data with insurance companies, insurance brokers, managing agents, loss adjusters and loss assessors in a variety of ways, including but not limited to;

- When obtaining a quotation
- When renewing a policy
- When making any alteration to an existing policy
- When making a claim
- When cancelling/lapsing a policy

In addition to the insurance related third parties, it may be necessary for other third parties to access data including but not limited to;

- Finance Providers (Premium Credit and Close Brothers Premium Finance)
- Our offsite file storage company (Kefron)
- Our IT companies (Open GI and PFH Computers)

It may also be necessary to transfer or rout your data through our group companies as part of internal processing from time to time, for example, when using shared encrypted portals for data security.

We undertake due diligence checks to ensure that all of our third-party providers are GDPR compliant.

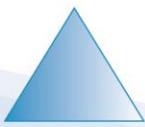
We may pass your personal data on to third-party service providers contracted to Aiken Insurances Ltd in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfill the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Aiken Insurances Ltd procedures.

Data Subjects Rights:

Aiken Insurances Ltd 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

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained or as required under applicable regulation and legislation. –Aiken Insurances Ltd adhere to the Central Bank of Ireland Guidelines and the Consumer Protection Code Guidelines on the Retention Period and have our own internal governance.

Complaints

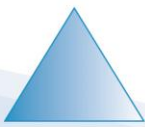
In the event that you wish to make a complaint about how your personal data is being processed by Aiken Insurances Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Aiken Insurances Ltd's data protection representatives Data Protection Officer / GDPR Owner

Failure to provide further information

If we are collecting your data for a contract of insurance 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

Insurance premiums are calculated by insurance market participants benchmarking clients' and beneficiaries' attributes as against other clients' and beneficiaries' attributes and propensities for insured events to occur.



This benchmarking requires Aiken Insurances Ltd and other insurance market participants to analyse and compile information received from all insureds, beneficiaries or claimants to model such propensities. Accordingly, we may use Personal Data to both match against the information in the models and to create the models that determine the premium pricing in general and for other insureds.

Aiken Insurances Ltd and other insurance market participants may use special categories of Personal Data and criminal records data for such modelling to the extent it is relevant, such as past motor vehicle convictions for motor insurance or construction details of a building for property insurance. Aiken Insurances Ltd and other insurance market participants use similar predictive techniques to assess information that clients and individuals provide to understand fraud patterns, the probability of future losses actually occurring in claims scenarios, and as set out below. We use these models only

for the purposes listed in this Privacy Notice. In most cases, our staff make decisions based on the models.

Automated broking platform

Where we use an automated broking platform, insurance quotations are offered entirely by matching whether the attributes that the client has provided meet the criteria set by the insurers, which determines (a) whether a quotation will be made; (b) on what terms; and (c) at what price. Each insurer will use different algorithms to determine their pricing, and clients must consult each insurer's privacy policy for further details. The platform merely queries whether attributes of potential insureds satisfy insurers' models and then returns the results. If the potential insured's attributes do not satisfy insurers' models, the quotation request is referred for review by a team with underwriting authority.

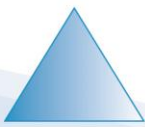
Clients may request that we provide information about the decision-making methodology and ask us to verify that the automated decision has been made correctly. We may reject the request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances we will verify that the algorithm and source data are functioning as anticipated without error or bias.

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. [We will update this privacy notice from time to time and so any changes can be reviewed by checking available privacy notice at the time.](#)

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on + 353 1 6672644 or email cara.aiken@aikenco.ie



Privacy policy statement changes

Aiken Insurances Ltd 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.

New Consumer responsibilities arising out of the Consumer Insurance Contracts Act 2019 which was implemented to protect consumers

Data Protection – Privacy notice and section 21(3) of the Act: Right of 3rd party to claim against insurer

If you hold insurance against a liability that may be incurred by you against a 3rd party, where for whatever reason you cannot be found or you become insolvent, or the courts find 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 the policyholder has incurred a liability the third party will be entitled to seek and obtain information from the insurer or us, the broker, concerning:

1. The existence of the insurance contract
2. Who the insurer is
3. The terms of the contract and
4. Whether the insurer has informed the insured person that the insurer intends to refuse liability under the contract

This privacy policy was last reviewed in December 2021