

Kennett Insurance Brokers Ireland DAC (Kennetts) Privacy Notice

Kennetts 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.

For the purposes of the GDPR the data controller is Kennett Insurance Brokers Ireland DAC. Our contact details are The Wilde, 53 Merrion Square South, Dublin, D02 PR63; Telephone Number +353-1-553-0244; and Email info@kennetts.ie

When we refer to we/us, we mean Kennett Insurance Brokers Ireland DAC

Please read this Privacy Notice 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?

Kennett Insurance Brokers Ireland DAC registered office is at The Wilde, 53 Merrion Square South, Dublin, D02 PR63 and we are a company registered in Ireland, CRO Registration 659206. We are a wholly owned subsidiary of WF Risk Group Limited, which is a wholly owned subsidiary of WF Risk Group (Holdings) Limited. Kennett Insurance Brokers Ireland DAC (C434244) is regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations 2018. Our principal business is to provide advice and arrange transactions on behalf of clients in relation to general insurance products.

Our GDPR Owner can be contacted directly here:

- Name: Aideen Conway
- Email address aconway@kennetts.ie
- Phone number +353-1-553-0244

How do we collect your information and what information do we collect?

For the purposes set out in this notice, we are required to advise you that, information, including personal information detailed below relating to you or anyone else to be covered by an insurance policy ("Personal Data and Special Categories of Data") will be collected and processed by us and/or on our behalf by our third-party service providers.

Our organisation collects personal data in the following ways, if you:

- request a service from us;
- register with or use any of our websites or online applications;
- use our website/apps and it installs cookies or other tracking technologies onto your device.
- engage with us on social media;
- contact us with a complaint or query;

This data will be provided by:

- You;
- Your family members, employer or representative
- Other insurance market participants
- Credit reference agencies
- Anti-fraud databases, sanctions lists, court judgements and other databases
- Government agencies such as the RSA and Revenue Commissioners
- In the event of a claim, third parties including the other party to the claim (claimant/defendant), witnesses, experts (including medical experts), loss adjusters, solicitors and claims handlers
- For risk management services this may also be provided as above, and by your employees, subsidiaries, agencies, third parties, health & safety executives, insurers, insurance providers, loss adjusters, engineers, and experts as deemed

- Open electoral register; or

appropriate and from paperwork, forms and documents pertaining to you.

Which of the sources apply will depend on your circumstances.

You will either be completing application forms or answering questions we ask you in order to provide the required information. We may also obtain information from other sources that you provide us with, for example, your driving licence, or other official documentation required in order to administer the policy(ies) of insurance. We may also obtain information which is readily available in the public domain such as the Internet of Things (IoT), Social Media, Press etc.

Each time you visit our website, we may automatically collect personal data and technical information including IP addresses.

What information do we collect?

We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice. The information we collect about you includes the following:

1.	Contact and Identifying information, e.g., title, name, address, contact details; email, mobile telephone number(s), landline telephone number(s)
2.	<p>Unique identifiers e.g.</p> <ul style="list-style-type: none"> • PPS number – the reason why we collect your PPS number is it may be required in the event of claim. • insurance policy numbers, the reason why we collect this is to obtain information on previous and current policies held. • Driving licence number, the reason we collect this is to meet the requirement of insurers in the issuing of motor policy(ies) (necessary information), and we may also require this information to assist in the processing of your claim. • Registration Number, we collect this information about your vehicle in order to arrange motor insurance. • Bank Details, and debit/credit card details - in order to arrange collection and transfer of payments
3.	Demographic details, age, gender, civil status, lifestyle, and insurance requirements; date of birth, current and or previous occupation, mental health and health conditions, credit searches, dependents (including children under 16 for travel insurance policies), photo ID, as well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. E.g., your children/spouse
4.	Family and Beneficiary Data, e.g., dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant.
5.	Employment information e.g., role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history; This information is necessary for our Fact Find with our clients.

6.	Publicly available sources: e.g., Information about you in the public domain such as Director information from the Companies Registration Office. Your business's internet site. The Internet of Things (IoT), your social media and Press etc.
7.	Health information such as information about your health status, medical records and medical assessment outcomes; We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol), medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information. We will require this information in order to provide motor insurance, employee benefits insurance, and in the processing of a claim pertaining to general insurance policies.
8.	Financial details e.g., bank account details, details of your credit history and bankruptcy status, court judgements, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details. This may be to arrange insurance or to assist in the processing of a claim.
9.	Claims Data (From you and any relevant third parties). The purpose of which will allow us to manage insurance and reinsurance claims; defending or prosecuting legal claims and investigating or prosecuting fraud.
10.	Marketing preferences: we will send you information on other products and services we offer under legitimate interest processing basis.
11.	Online information: e.g., information about your visits to our websites
12.	Events information e.g., information about your interest in and attendance at our events, including provision of feedback forms;
13.	Social media information (e.g., likes and posts) with our social media presence; this includes, LinkedIn and X.
14.	Criminal records information e.g., the existence of or alleged criminal offences, or confirmation of clean criminal records for general insurance policies. This includes information in the public domain, or shared by a third party provider.
15.	Searches that we undertake in relation to sanctions, money laundering and credit checks.

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

Information we automatically collect.

We sometimes automatically collect certain types of information when you visit our websites and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your expressed consent. Further information about our use of cookies can be found in our Cookie Notice at the footer of our web page.

How do we use your personal data?

<p>Why?</p>	<p>We obtain, collect and process your personal data and special categories of data (which includes sharing your data with others) to enable us to provide the following:</p> <ul style="list-style-type: none"> • Quotation/inception <ul style="list-style-type: none"> – Setting you up as a client, including possible fraud, sanctions, adherence to the Consumer Protection Code, credit and anti-money laundering checks, and to provide you with details of other services we provide which may be of interest to you. – Evaluating the risks to be covered and matching to appropriate policy/premium – Payment of premium where the Insured/Policyholder is an individual • Policy Administration <ul style="list-style-type: none"> – Client care, including communicating with you and sending you updates – Payments to and from individuals, including arranging premium finance. – In the event of receiving, investigating and responding to a complaint • Claims Processing <ul style="list-style-type: none"> – Managing insurance and reinsurance claims – Defending or prosecuting legal claims – Investigation or prosecuting fraud • Renewals/Reviews <ul style="list-style-type: none"> – Contacting the Insured/Policyholder to renew the insurance policy – Evaluating the risks to be covered and matching to appropriate policy/premium – Payment of premium where the Insured/Policyholder is an individual • Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the lifecycle period <ul style="list-style-type: none"> – Complying with our legal or regulatory obligations – General risk modelling – Transferring books of business, company sales and reorganisations • Risk Management <ul style="list-style-type: none"> – Setting you up as a client, communicating with you, defending or prosecuting legal claims/circumstances/events, evaluating the risks presented. – Production of reports, recording of still images, and/or dealing with your suppliers, third parties, representatives, agencies, subsidiaries as disclosed and directed by you. – Sharing this information with insurers and insurance providers to assist with the premium and negotiation of your insurance contract. Dealing with regulatory bodies. – Collection of payment where the data pertains to an individual. • To administer our site including data analysis, testing, research, statistical and survey purposes. <p>Please note that in addition to the disclosures we have identified against each purpose, we may also disclose personal data for those purposes to our service providers, contractors, agents and group companies that perform activities on our behalf.</p> <p>If you do not provide the requested data it may not be possible to obtain a quote or provide you with a policy.</p> <p>If you do not provide us with appropriate access and/or information we request to provide our risk management advice and service, we may be unable to provide you with a report or provide our service.</p>
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Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data.

<p>Our Legal Basis</p>	<p>In order to arrange and administer your insurance and provide risk management services we will be using one or more of the following legal bases:</p> <ul style="list-style-type: none"> • Processing is necessary in order for us to take steps, at your request, to enter into a contract of insurance when you ask us to provide a quotation, place cover, and for the performance of that contract and when you need to make a claim. Processing is also necessary to enter into a contract when you ask us to provide you with a Risk Management service, advice and/or report. • Processing is necessary for us to comply with any legal or regulatory obligation. • Where we believe a customer is vulnerable, processing might be necessary to protect the vital interests of that person or other person covered by the policy. • Where you request details of the services we provide, you have received a quotation, or we arrange and administer insurance, risk management services or ancillary services on your behalf we will have a legitimate interest to provide you with further information about our services and those of our associated companies. We may have a legitimate interest in processing the data for changes to any quotation or policy which you may request, or for any other reason necessary to undertake any other requests related to your insurance policy. • In respect of children’s data, a child being a person under the age of 16, which is only collected for the purposes of arranging travel insurance; and as part of our financial planning process and in conjunction with trusts etc, we will seek parental consent to hold the data and record that consent.
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If you require further information on any of the above basis for processing your data, we can provide you with further details.

How we share your data

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements.

<p>Who we share data with</p>	<p>We are a Data Controller, and in order to process your requests we may be sharing your data with one or various third parties. The parties we may share with and our reasons for sharing that information are listed but not limited to the following:</p> <ul style="list-style-type: none"> • Insurers, Reinsurers, Insurance providers (ie Placing Brokers, Delegated Authority Schemes, Wholesalers) for both General Insurance in order to provide you with quotations, cover, policy administration, to arrange and progress claims, and renewals and carry out reviews. • Loss adjusters/assessors, surveyors, solicitors, private investigators, surveillance companies, possible suppliers for repair/replacement facilities including Third Parties’ representatives, ie their insurers, solicitors to assist in the event of a claim, or to assist in your Risk Management Assessment, report and service. • Premium Credit providers, and Other Credit facilities sourced and arranged to assist with the payment of contracts we have arranged for you, to include credit reference agencies to assist in determining an appropriate payment plan, and in the event of non-payment to debt agencies, courts and/or solicitors. • State, statutory and/or government departments, bodies or agencies such as regulators eg (Central Bank of Ireland, FCA, PRA, OIC, DPC), Financial Services & Pensions Ombudsman eg.(FSPO), crime agencies, Insurance Ireland and Insurance Confidential Fraud Bureau, Garda, sanctions checking, Health & Safety Authority (HSA), National Claims Information Database (NCID), Motor Insurers Bureau of Ireland (MIBI), The Irish Motor Insurance Database (IMID),
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	<p>Insurance Compensation Fund (ICF), Road Safety Agency (RSA), etc for the avoidance and detection of crime and/or fraud, to meet our regulatory and legal obligations and/or where we are required to by law. We will also interact with these parties to assist with your contract performance, your claim and our risk management services.</p> <ul style="list-style-type: none"> • Our Staff, sub-contractors acting on our behalf, our group/associated companies’ offices, internal and external auditors, financial institutions, such as our bank, interested parties (such as your mortgage provider), Interpreters, call recording and monitoring, to assist with staff training, quality and monitoring, complaints, accounting controls and banking, customer service and/or in the event one of our sites temporarily goes down. We will also use this to exercise legitimate interest regarding our services. • Telecommunications, IT providers, software, hardware, cloud and system and technical management providers to detect, secure, test and back up our systems, to safely process and hold all data, and collective management information. • We may also use your data in an anonymised form as part of statistics or other aggregated data shared with third parties. • Our own insurers, insurance providers, and solicitors, where we need to provide information about you and/or defending ourselves in a legal dispute or as required by law, or where a circumstance exists that a future claim may occur <p>Other third parties not detailed above, to be shared only for the purposes stated, or in a way you would reasonably expect us to, unless we inform you otherwise.</p>
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Transferring personal data outside of Ireland

Where we transfer personal data to a country outside of the EEA (referred to in the GDPR as ‘third country,’) we will ensure it is done lawfully, i.e. there is an appropriate “level of protection for the fundamental rights of the data subjects”. We will therefore ensure that either the EU Commission has granted an adequacy decision in respect of the third country, or appropriate specified safeguards have been put in place, (e.g., Binding Corporate Rules (BCRs) or Standard Contractual Clauses (SCCs)).

We share data with our parent firm and subsidiary firms located in the UK. The EU Commission adopted adequacy decisions for transfers of personal data to the UK. This means that the EU accepts that the UK data protection regime is substantially equivalent to the EU regime and allows personal data to be transferred freely from the EEA to the UK. Therefore, the UK is not deemed a third country.

Security

The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

Retention

We shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

We may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

The retention period for each category of personal data will be set out in our Retention Schedule along with the criteria used to determine this period, including any statutory obligations we have. Should you require further information we would be happy to provide you with a copy.

Personal data will be disposed of securely.

Liability Insurance

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 including us 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.

Data Subjects Rights:

We will facilitate your 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. (The erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).
- **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 make a complaint:** if we refuse your request under rights of access, we will provide you with a reason as to why.

All 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.

Complaints

If you wish to make a complaint about how your personal data is being processed by us or how your complaint has been handled, you have the right to lodge a complaint with our GDPR Owner, Aideen Conway, aconway@kennetts.ie

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

Data Protection Commission
21 Fitzwilliam Square South,
Dublin 2.
D02RD28
Web: www.dataprotection.ie
Email: info@dataprotection.ie

See website for updated contact details to reach the appropriate section within the DPC.

Failure to provide further information.

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

When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

Profiling – automatic decision making.

An automated decision is when we input your personal data into a computer programme and this programme analyses your personal data to provide us with a result. There is no human involvement in the decision making. An example of this is providing home, travel and motor insurance. If a decision is taken by automated means, you have the right to object to this and ask us to reconsider the service you have asked us to provide. We will still be able to carry out this type of decision-making where:

- It is necessary to enter into or for the performance of a contract (such as a contract of insurance) which is the main reason we would use this type of decision-making; or
- You have given your explicit consent for us to do so.

Special Categories of personal data

Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health, criminal convictions, sexual orientation, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for insurance purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

- a policy of insurance
- a policy of health insurance or health related insurance
- an annuity contract or any other pension arrangement resulting from a claim
- processing of a claim

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on +353-1-553-0244 or email info@kennetts.ie

Privacy notice/ statement changes

When we update this Privacy Notice/Statement, we will post a revised version online. Changes will be effective from the point at which they are posted. We would encourage you to review our Privacy Notice so that you are aware of updates.

This privacy policy was last reviewed in Sept 2024. V2
