

# Data Protection Statement

360 Degree Underwriting dac is registered and regulated by the Central Bank of Ireland (Registration No. C180447).

360 Degree Underwriting dac respects and protects your privacy and collects, processes and controls your personal information in accordance with this Privacy Notice and in compliance with the Data Protection Acts and General Data Protection Regulation. We only ask for information that is relevant and we only keep data for specified, explicit and lawful purposes. This privacy notice sets out how we collect, use and disclose personal and sensitive data.

The following principles are adopted in processing of personal data:

- a) we process data lawfully, fairly and in a transparent manner
- b) we collect data for our specified, explicit and legitimate purposes only
- c) we only process data that is adequate, relevant and limited to what is necessary for the purposes for which the personal data is processed
- d) we keep data up to date and accurate. Any inaccuracies are erased or rectified without delay
- e) we do not keep data for longer than is necessary for the purposes for which the personal data is processed
- f) we process data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## What information does 360 Degree Underwriting dac retain, and why?

We obtain and keep personal data in order to provide an insurance underwriting and quotation service. The information is used to underwrite and offer insurance quotations. We may use the personal data we hold about you if you have given us consent for the processing of your data or in the following ways:

Why we Use your Data	Our Legal Basis for using it
To risk assess and underwrite the risk proposed	For the fulfilment of the insurance contract between you and us
To administer policies at inception, mid-term adjustments and renewal throughout the term of the policy	For the fulfilment of the insurance contract between you and us
To complete the processing of any claims	For the fulfilment of the insurance contract between you and us
For the compilation and analysis of internal reports and risk statistics	To satisfy our legal business interest and to analyse historical activity (but all identifiers will be deleted in order to protect your data)
In order to comply with regulatory and legal obligations imposed upon us	To comply with regulatory and legal obligations imposed upon us eg. fraud, anti-money laundering

## The Information that we might retain

The below is a list of the type of information that we may collect, share and retain;

- Name
- Address
- Phone Numbers
- Date of Birth
- Email addresses
- CV's
- Occupation
- Medical History
- Bank Details
- Fee Income / Turnover / Wages
- Convictions

### Parties that we might share data with or seek information from

We may share details or seek information from a number of external parties where there is a valid business reason for doing so. Some of those parties would include;

- Person's acting on the customer behalf e.g. Insurance Intermediary, Loss Assessors, Solicitors and Executors
- Person's acting on the Insurers behalf e.g. Claim Managers, Loss Adjusters, Salvage Companies, Repairers, Qualified Professionals, External Investigators, Medical Practitioners or Solicitors
- Insurance companies and Third Party Underwriters who we obtain quotations from
- Reinsurers
- Private investigators when we need to further investigate certain claims
- Personal Advisors and Consultants e.g. Surveyors for the purpose of surveying a risk
- Debt Collection and Tracing Agencies
- Financial Organisations
- The Financial Services Ombudsman, the Central Bank, the Financial Conduct Authority or any equivalent foreign supervisory body
- The Gardaí/Police, Revenue Commissioners/HMRC or any other persons authorised by law to access records
- Computer Network maintenance companies

### Transfer of Personal Information overseas

It may sometimes be necessary to transfer personal information overseas. When this is needed information is only shared within the European Economic Area (EEA). Any transfers made will be in full compliance with all aspects of the Data Protection Act, Ombudsman and Regulatory authorities.

### Data Retention and Security

We only retain data as necessary and we keep personal and sensitive data safe and secure and ensure that appropriate security measures are taken against unauthorised access to, alteration, disclosure or destruction of personal/sensitive data.

### How long do we retain your Data?

Data Type	Retention Period
Personal Data collected as part of a broker marketing/quotation process only, and where no further client relationship exists ie. cover is not bound with us	15 months
Policyholder Personal Data – Liability Policy	Indefinitely
Policyholder Personal Data – Property, Project Works or Plant and Machinery Policy	7 years from termination date of relationship

### Your Rights

Data Protection regulation affords you the following rights:

- right of access to data
- right of rectification of data records
- right of erasure of data records
- right to restrict processing
- right to data portability
- right to object

If you would like to exercise any of these rights please email us at [GDPR@360uw.ie](mailto:GDPR@360uw.ie) and we will review your request in line with the General Data Protection Regulation and legislation.

### Our Website

Our website may contain links to the websites of broker or Insurer partners. 360 Degree Underwriting dac accepts no responsibility for the content on these or any other third party websites.

### **Cookie Notice in relation to use of our Website**

When you access our website, you will be asked to accept a cookie, which is a small text file downloaded to your device when you visit our website. They are widely used in order to make websites work, or work more efficiently, or to recognise the user and store information about the user's preferences or past actions.

We use a number of different cookies on our website. By accessing and using our website, you indicate that you accept the use of these cookies. We use cookies for the inherent functionality of our website portal and to collect non personal data about visitors to our website. This may include web analytical tools e.g. Google Analytics whereby information is gathered from visitors to our website to get a better understanding of where our visitors come from and how they browse and utilise the website.

### **Controlling Cookies**

You can use your web browser to delete, block or allow cookies. In addition you can open a 'private browsing' / 'incognito' session which allows you to browse the internet without storing local data.

For further information on how to manage and opt-out of cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **Complaints**

You have a right to lodge a complaint with the Data Protection Supervisory Authority if you are unhappy with any aspects of how your data is handled by us. We would welcome the opportunity of addressing any issues that you may have directly first however, and contacting 360 Degree Underwriting dac in the first instance does not impact your rights to escalate the matter thereafter, in the event that you are not entirely satisfied.

### **Contact Details in the event of a Complaint**

360 Degree Underwriting dac  
complaints@360uw.ie

Data Protection Supervisory Authority  
[www.dataprotection.ie/docs/complaints/1716.htm](http://www.dataprotection.ie/docs/complaints/1716.htm)