

# Data Privacy Notice

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# Data Privacy Notice

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At Cornmarket, we are committed to protecting the privacy of your personal information. This Data Privacy Notice explains how we do this, as well as letting you know about your rights in relation to your personal information.

## **1. WHO WE ARE**

Cornmarket Group Financial Services Limited (Cornmarket) with our head office at Christchurch Square, Dublin 8, is one of Ireland's largest Insurance Brokers. We specialise in serving the financial needs of affinity groups and place a particular focus on the public sector. Working closely with unions/associations and other employers, we help our customers find the right financial products to suit their needs, with everything from car, home and health insurance to life insurance, income protection, retirement planning, mortgages, a tax return service and more. We use and share personal information so that we can provide you with products and services as a data controller. Cornmarket is a member of the Great-West Lifeco Group of companies and a sister company of the Irish Life Group Ltd.

## **2. WHAT IS A DATA PRIVACY NOTICE & WHY IS IT IMPORTANT?**

We know your personal information is important to you and it is important to Cornmarket too. Cornmarket has measures in place to protect and ensure the security of your personal and sensitive information. This Data Privacy Notice tells you what we use your personal information for, who it is shared with, and explains your rights around how we use it. We will direct you to our Data Privacy Notice when we collect personal information from you, for example when you ask for a quote or apply for a product through Cornmarket. Please read this Data Privacy Notice to understand how and why we use your personal information.

If you give us personal information about someone else, please make sure you have their permission and make them aware of this Data Privacy Notice, as it also applies to them.

## **3. WHAT PERSONAL INFORMATION WE COLLECT AND WHY**

We collect and use personal information, to give you financial planning advice, to advise you about financial products and services we arrange, to administer these products and services should you decide to go ahead with taking out a financial product or service through Cornmarket, to provide customer care and service, including handling complaints, and to contact you to inform you of any relevant actions you may need to take. Where relevant, we also use personal information to auto-enroll you to a Group Scheme as arranged by your employer, or to provide you with automatic access to Group Schemes as arranged by your union/association.

In addition, we use personal information to efficiently manage our business including, to improve our services; perform financial reporting; comply with laws, statutory codes and regulations; to manage our risks; and to understand our customers and support relevant customer engagement.

We will ask for information depending on the product or service type we are providing you with. The information collected includes, but is not limited to, your name, date of birth, contact details and bank account details. Depending on the policy or service type this can include health, employment, pension, and salary information and your PPS Number. We restrict access to, and the use of, special categories of data and other sensitive personal information such as health information, union membership, and penalty points.

## **4. LAWFUL BASIS OF PROCESSING**

We must have a lawful basis to collect and use personal information. This is explained below:

### **Needed to perform your contract:**

We need to collect and use your personal information to arrange for your policy contract through the relevant insurer who provides any policy you have in place; to provide you with a tax return service as part of our Tax Return Service; to arrange for a financial product from a financial institution whose products we offer and of which you may wish to avail; or to take steps requested by you before you enter into your contract for a product or service provided through Cornmarket.

The personal information needed for policy contracts and financial products and services is held and used to:

- verify your identity and to verify the accuracy of the information we receive about you
- provide you with financial advice
- assess the information we have received about you and to make a decision as to whether products or services are suitable for you so we can provide you with insurance cover through the relevant insurer/offer you a product through the relevant financial institution
- assess financial information you have provided us with as part of our Tax Return Service and to file a tax return on your behalf, where you have provided your authorisation to do so
- correspond with the Revenue Commissioners when reviewing your tax affairs as part of our Tax Return Service to ensure accuracy of your tax return. We will only do so with your authorisation
- provide you with a quotation for an insurance product and to arrange for the provision of specific insurance cover should you decide to purchase a product through Cornmarket
- facilitate your loan application process through the relevant bank or mortgage lender

- share your personal information with the relevant insurer to ensure that you have the appropriate cover in place
- provide you with information about any policy/financial product/service that you have in place through Cornmarket
- provide customer care and service – to administer any policy/financial product/service that you have in place through Cornmarket and make any changes during its term, answer queries, provide updates or process a cancellation or other service requests
- contact you to inform you of any relevant actions you may need to take
- manage and investigate any concerns or complaints you may have
- receive any payments in relation to your membership of our Tax Return Service, or in relation to your insurance policy/pension or other financial product for onward transmission to the relevant insurer/provider, where appropriate
- store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes
- assist you in the making of a claim through the relevant insurer.

We will ask for information depending on the product/service type. The information collected includes, but is not limited to, your name, date of birth, contact details and bank account details. Depending on the policy or service type this can include health, employment, pension, and salary information and your PPS Number. We restrict access to, and the use of, special categories of data and other sensitive personal information.

If you get financial advice from us, we will assess your financial needs and recommend financial solutions to help meet your identified needs. This includes contacting you to arrange future financial reviews where we believe this is of benefit to you. We will need to collect personal information to provide this service.

Due to the nature of Group Schemes (such as Salary Protection Schemes, Group Life Plans, Mortgage Protection Schemes etc.), the Scheme owner (i.e., your union/association, your employer, your local authority) may choose to select a new broker. As a result, where Cornmarket has been selected as the new Broker for a Scheme, we may need to receive your personal data from the Scheme owner/previous Broker/Scheme insurer to ensure your insurance cover remains in place and to fulfill our obligations as the new Broker of the Scheme. These obligations will include many of the activities outlined above in this section.

#### **Required by law:**

We use your personal information to comply with laws, statutory codes, and regulations. Below is how we use your personal information for this purpose:

- For the provision of financial advice, you must give personal and financial information for your current and future needs to be assessed. This allows us to assess your affordability and recommend the most suitable financial product for you. This also involves creating new personal information about you. We are required to complete this analysis of you, using your personal information, in order to comply with regulations applicable to Cornmarket
- Reporting to regulators, the Revenue Commissioners and other official government agencies
- Keeping proper books and records.

We carry out internal reporting, quality checking, compliance controls and audits to help meet our legal obligations.

We must collect certain personal information to comply with Anti-Money Laundering law. This depends on your policy type but includes up to date proof of identification and address. We also screen customers against Financial Sanctions and Politically Exposed Persons (PEP) lists. We use your name, address, nationality, occupation information, gender, and date of birth for this purpose.

To give you financial advice, we need personal and financial information about you and your dependants to assess your current and future needs. This will include information about your general state of health. We need this to make an appropriate financial recommendation for you. This will involve creating new and inferred personal information about you such as your investment risk profile. We must carry out this analysis using your personal information to comply with regulations.

As a regulated intermediary we use your personal information to identify whether a financial product is suitable for you based on the product target market identified by the relevant product provider.

When you give us your personal information we will check to see if we already have a record of you. This helps us to reduce duplicate customer records and to comply with your Data Protection rights. Please see Section 11 of this Data Privacy Notice for more details about your rights.

The type of personal information that is required by law may vary in the future.

#### **Cornmarket's legitimate interests:**

We use your personal information for our legitimate interests as shown below. We have taken account of any privacy risks and have ensured that your data protection rights are not affected, including your right to object.

Where possible, we will provide you with an option to opt out. We believe these uses benefit our customers. You can contact us if you have any questions using the contact details in Section 12 of this Data Privacy Notice.

- **Call Recording:**
  - Calls are recorded for staff training and monitoring, as well as for maintaining a record of customer transactions we complete over the phone and for customer service purposes. We also save the number you're calling from to help us handle your call and direct you to the most suitable team and to facilitate callback requests. This includes calls through landline, internet or mobile. We let you know if a call is being recorded at the start of the call so you can decide to continue or not.
- **Aggregate Analytics and Statistics:**
  - We perform data analytics and statistical analysis on our products and customers to understand how our customers interact with us, what products and services customers avail of and to develop and promote our products and services. Aggregate reports are used for these purposes where individuals are not identifiable.
- **Individual Analytics and Profiles:**
  - We continue to develop our data analytics to provide insights including behavioural attributes at individual customer level to improve the efficiency of our business and the quality of service we provide to our customers. This includes helping us identify existing groups of customers that may benefit from early and ongoing engagement in relation to financial needs, objectives and our products and services.
- **Details of your Occupation and Workplace:**
  - We use details of your occupation and workplace to inform you about products and services that are suitable for you based on this information.
- **Market Research:**
  - We carry out market research inclusive of customer surveys, to improve our processes, products, or services or to investigate the possibility of new processes, products, or services and to buy or sell any business or assets.
- **Where you have Registered your Interest for a Particular Product, Offer or Service:**
  - We will contact you about particular products, offers or services where you have registered an interest for these.
- **Web Messaging:**
  - When you use our web messaging service, we will use your personal information, where relevant, to deal with any queries you have. A record of your interactions with us via Web Messaging will be retained for training and monitoring, as well as for maintaining a record of our customer requests and queries.
- **Competitions and Draws:**
  - We may from time to time use your personal information for competitions and draws. For example, where you have taken certain actions, such as obtained a quotation from Cornmarket, availed of a financial health check, taken out a particular product, completed a survey etc., you may be entered into a draw for a particular prize. We will only use minimal personal data for these purposes. In the event of you winning a competition or draw, we will contact you by telephone or email.
- **Customer Research:**
  - To help improve the level of service we provide, we carry out customer research through surveys and we may on occasions contact you for participation in consumer satisfaction or research surveys.
- **Safety, Security and Fraud Prevention:**
  - We capture and hold data from email, web, and network traffic to monitor and protect information security and to support investigation around cyber or data loss events (e.g., a malicious act – virus or hacking).
  - If you visit our offices, we will record CCTV footage for safety and security reasons. We only hold these recordings temporarily and for longer if we need to for safety and security investigations.
  - We use personal information to prevent, investigate and identify suspicious or fraudulent activities.
- **Customer Queries and Service Requests:**
  - After the product/service you have in place through Cornmarket has ceased, when you or your appointed representative send us a query, concern, or request a service, we will collect and use personal information needed to respond to your request. We will use your product/service information to respond to your queries and requests.
- **Sharing with Appointed Representatives:**
  - Where necessary, your personal information is shared with appointed or legal representatives, for example in the case of an estate.

- **Automatic Access to Group Protection Schemes – Assessment and Retention of Ineligible Members'**

- **Personal Data:**

- In some instances, where we have received your personal data from your union/association to assess your eligibility for automatic access to a Group Protection Scheme, we may determine that you are ineligible for membership of the Group Protection Scheme through automatic access. In these instances, we will retain your personal data for a period of up to 7 years to handle any queries you may have in respect of the outcome of our assessment, and to investigate and manage any complaints/disputes that may arise.

- **Sharing with Referrers**

- Where you were referred to us, by a regulated third party, we will share information with them about the outcome of that referral.

- **Automated Processing**

- We may use automated systems and processes, including machine learning and artificial intelligence, for efficiency and to improve the service we provide to you. The design and use of these technologies can involve processing personal and sensitive information.
  - Where personal information is used in this way, where possible, we alter or remove information to prevent you being identified.

- **Sharing with Group Scheme Owners for Scheme Administration and Corporate Insights:**

- We will share information with Group Scheme Owners to the extent that it is required in order to administer the group scheme.
  - We also share aggregate insights with Group Scheme Owners in relation to levels of participation, usage of benefits and claim categories. Aggregate reports are used for these purposes where individuals are not identifiable.

**With your consent:**

You need to give consent for us to collect and use personal information classed as sensitive or for certain uses of your personal information. You are given the choice to provide consent, or not. When we collect your consent, we will explain what we need it for and how you can change your mind in the future.

- **Your Union Membership:**

- We use your union membership to determine your eligibility for certain insurance policies that we arrange. In the absence of your consent to our processing of your union membership we will be unable to provide you with products where union membership forms part of the eligibility criteria for the policy.
  - We also use your union membership to advise you about products, services, and discounts available to specific unions which may be of interest to you. We will use your union membership for this purpose where you have also provided your consent to direct marketing (see more information below regarding direct marketing). In the absence of your consent to our processing of your union membership we will be unable to advise you about products, services, and discounts available to union members.

- **Direct Marketing:**

- We would like to be able to contact you about offers and services, separately from your policy communications. We will only send you direct marketing content where we have your consent.
  - Your information will not be passed on to third parties for the purposes of direct marketing.

- **Cookies:**

- When you visit our website we will use cookies for purposes such as: to make our website work properly, to understand how visitors use our site and help us improve it, to remember your preferences and settings, and to deliver relevant advertisements and content based on your interests.
  - You can choose to accept or decline these cookies using your browser or device settings. Blocking some types of cookies may affect your experience of the site.
  - In some cases when we send you emails, we will use cookies and/or similar technologies to tell us if you have received and opened the email.
  - For detailed information on the cookies we use and how you can manage them, please see our Website Privacy Statement available at [www.cornmarket.ie/website-privacy-statement](http://www.cornmarket.ie/website-privacy-statement).

- **Union/Association Specific Rewards Clubs:**

- Rewards Clubs are a benefit of your union/association membership and are provided by Cornmarket in conjunction with specific unions/associations. Rewards Clubs provide Rewards Members with access to certain discounts/free periods across a range of products and services that we arrange and access to competitions, complimentary financial advice and webinars etc. (your Rewards Benefits). When signing up for union/association membership, certain unions/associations allow their members to join Rewards Clubs. When

you opt in to Rewards via your union/association application form, your union/association will share your personal data with Cornmarket.

- o In certain circumstances, you may also be able to join a Rewards Club, directly through Cornmarket, within a limited period of time, but in these circumstances, we may need to validate your union/association membership first either by:
  - Asking you to provide a dated copy of your acceptance confirmation to your union/association, or
  - Asking you for your permission so that we can validate your union/association membership with your union/association directly.
- o If you choose to opt in to the Rewards Club as part of your union/association membership, we may contact you by post, email, telephone, mobile phone or SMS so you can avail of the Rewards Benefits available to you as a Rewards member. These communications are separate to direct marketing communications as described above.
- **Media Consent:**
  - o Where you have provided your consent to do so, we will use your image, name, voice, written and/or personal feedback, as applicable, in our written, print, digital, audio and/or video testimonials and other promotional materials published by us. This material may appear in the following channels: the Cornmarket website/ MyCornmarket portal, relevant union/employer websites, insurance company websites, print materials, email communications, video channels, union magazines, radio campaigns, social media platforms, workplace presentations and events.

## 5. CONSENT AND HOW TO WITHDRAW CONSENT

If we process your personal information based on consent, you have the right to withdraw that consent at any time. The opt-out methods will depend on how the consent was collected and will be explained when you give us your consent, e.g., you can change your mind using the opt-out link in any direct marketing emails sent to you.

You can withdraw your consent by the following means in relation to the processing of your union membership:

By writing to: Cornmarket Group Financial Services Ltd, Christchurch Square, Dublin 8

By emailing: [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

By telephoning: (01) 408 4000

You can withdraw your consent by the following means in relation to direct marketing (please ensure to specify what communication channels you want to be opted out from):

By writing to: Cornmarket Group Financial Services Ltd, Christchurch Square, Dublin 8

By emailing: [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

By telephoning: (01) 408 4000

Online at: [www.cornmarket.ie/unsubscribeform/](http://www.cornmarket.ie/unsubscribeform/)

You can withdraw your Rewards consent by the following means:

By writing to: Cornmarket Group Financial Services Ltd, Christchurch Square, Dublin 8

By emailing: [deleterewards@cornmarket.ie](mailto:deleterewards@cornmarket.ie)

By telephoning: (01) 408 6265

Online at: [www.cornmarket.ie/delete-rewards](http://www.cornmarket.ie/delete-rewards)

You can withdraw your media consent by the following means:

By writing to: Cornmarket Group Financial Services Ltd, Christchurch Square, Dublin 8

By emailing: [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

By telephoning: (01) 408 4000

## 6. AUTOMATED DECISION MAKING INCLUDING PROFILING

### Insurer Profiling

The relevant insurer for your policy may use automated decision making in the calculation of premiums or during the underwriting process in order to provide you with cover. Please refer to the relevant insurer's Data Privacy Notice for more information in relation to this.

### Risk Profiling

To establish a customer's attitude to investment risk in relation to pensions and investments, our financial advisors use automated software which determines the customer's attitude to various levels of risk having answered a series of questions.

Where any automated decision making produces legal effects for you or otherwise significantly affects you, you will have the right to obtain human intervention and to contest and make representations in relation to the decision in question.

## 7. HOW AND WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?

You provide us with your personal information directly when you contact us, complete our forms, use our on-line digital services, speak with us, or visit our website or social media accounts, when you interact with our company through video calls and webinars, when you use webchat, or when you use the MyCornmarket portal. For more information on what personal information is collected and used on our website please see our Website Privacy Statement which includes information regarding our use of Cookies and is available at [www.cornmarket.ie/website-privacy-statement](http://www.cornmarket.ie/website-privacy-statement)

From time to time, we also receive personal information from insurers, banks or mortgage lenders, solicitors, your union/association, the Revenue Commissioners (with your authorisation), accountants, other third parties you may have nominated, employers, local authorities, trustees, or regulators (where relevant).

Due to the nature of Group Schemes (such as Salary Protection Schemes, Group Life Plans etc.), the Scheme owner (i.e., your union/association, your employer, your local authority) may choose to select a new broker. As a result, we may also receive your personal data in respect of Group Schemes, from another broker/the Scheme owner/the Scheme insurer, where Cornmarket is selected as the new broker of the Scheme.

We may also receive your personal data from your employer, as a Scheme owner, where they auto-enroll you to a Group Scheme as provided for in your contract of employment.

We may also receive your personal data from your union/association, as a Group Scheme owner, where they have arranged for automatic access to Group Schemes on behalf of their members.

From time to time, we may also receive up to date contact information for you from Scheme owners to ensure that we can correspond with you regarding your policy or to arrange for premium payments on your policy. We may also receive your personal information from Scheme Owners as part of processing a claim on your behalf or to process premium payments on your behalf.

We also create new personal information about you based on information you have provided us and through your interactions with us, such as noting your online preferences.

## 8. WHO DO WE PASS YOUR PERSONAL INFORMATION TO?

We pass personal information to:

### • Insurers/Product Providers:

- o We share your personal information with the relevant insurer(s) /product provider(s) to provide you with quotations, to process your applications, to ensure that you have the appropriate cover in place, for reconciliation purposes and to process claims, where relevant. This includes insurers for specific benefits on motor and home insurance policies such as legal expenses cover, driveaway assistance and home/motor rescue cover.
- o Scheme reviews are carried out to ensure we obtain the best price and benefits for the policies we administer. This may sometimes lead to a new insurer being selected to underwrite a particular Scheme. In the event of this happening, your personal data will be transferred to the new insurer.
- o We share your personal data with the relevant insurer for Schemes to ensure that these Schemes remain competitive.

### • Banks/Mortgage Lenders:

- o We share your personal information with the relevant bank(s) or mortgage lender(s) to provide you with a requested mortgage quotation, to process your mortgage application, to ensure that you have the most suitable mortgage loan in place and to process the drawdown of the mortgage funds. We will only do so with your permission.

### • Valuers:

- o We share your personal information with the relevant bank or mortgage lender valuer(s) to request them to provide the lending bank or mortgage lender with a Property Valuation as per the mortgage loan conditions. We will only do so with your permission.

### • Your Authorised Representatives:

- o We share your personal information with third parties you have nominated to deal with our company on your behalf.

### • Owners of Group Schemes:

- o We share your personal information with Scheme Owners to the extent that it is required in order to administer the group policy e.g., for reconciliation purposes including for premium query purposes and for queries regarding contact information, and as part of Scheme Reviews. The information shared is minimised.
- o We also share aggregate insights with Scheme Owners in relation to levels of participation, usage of benefits and claim categories. Aggregate reports are used for these purposes where individuals are not identifiable.

- o In the event of a claim or a dispute we will only discuss your case with representatives of Scheme Owners where we have your consent to do so.
  - o We may also share your personal information with Scheme Owners, where relevant, in order to facilitate premium payments. We will only do so with your authorisation.
- **Brokers:**
    - o Due to the nature of Group Schemes, Scheme reviews may also sometimes lead to a new broker being selected by the Scheme Owner to administer a Group Scheme. In the event of Cornmarket being replaced by another broker, your personal data will be transferred to the new broker to enable them to perform the administration duties of the Scheme and to ensure your cover remains in place.
- **Data Processors:**
    - o We share your personal information with companies that act as service providers under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used by other parties for any other reason.
    - o Our main Data Processors are Irish Life Group Services Ltd and Canada Life Group Services Ltd.
    - o The categories of services that we use Data Processors for include: document and print management, document disposal, administration, to facilitate the completion of a tax return as part of our Tax Return Service, to facilitate the application process for cover/mortgage finance, I.T. infrastructure solutions, cyber security, telephony services, customer services, making and receiving payments, Financial Sanctions and PEP screening, website features, customer research, and marketing.
- **Trustees:**
    - o We share your personal data with appointed trustees in connection with the policy contract including for the handling of claims.
- **Regulators and Other Official Agencies:**
    - o Where required we may share your personal data with regulators, An Garda Síochána, the Revenue Commissioners, other official agencies or as needed to comply with regulations, statutory codes and laws. For motor insurance, this may include the requirement to validate your driving licence number.
- **Other Third Parties:**
    - o We may also from time to time take instructions from third parties (usually by phone or email) to alter policies (such as a motor dealer instructing us to change the vehicle cover for a motor insurance policy) or to seek information on a customer's policy (such as a Building Society seeking information on the buildings insured where they hold an assignment on the policy). It is our practice in such circumstances to accept such instruction or provide such information in good faith as a facility to our customers.
- **Employers:**
    - o We may share your personal information with your employer in order to facilitate premium payments or for the purposes of making a claim. We will only do so with your authorisation.
- **Trade Union/Association/Employer Initiatives:**
    - o From time to time, your union/association/employer and Cornmarket may run joint initiatives, such as provision of a service free of charge to you e.g., a free financial health check, where the service is paid for by your union/association/employer. In such circumstances your trade union/association/employer will want to verify that only its members/employees have availed of the service offered. To facilitate this, Cornmarket will share minimal personal information in a secure format, of those who have availed of the service, with your union/association/employer so that they can reconcile this with their own records.
- **Third Parties for digital advertising and marketing:**
    - o Your online activity will be shared with third party providers such as social media platforms where you consent to marketing cookies.
- **Referrers**
    - o We pass limited and aggregated personal information to regulated third parties who referred you to us.

## 9. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EUROPEAN UNION (EU)?

While your personal information is generally processed and stored within the EU, in limited circumstances we do transfer personal data outside the EU. Examples of countries where personal data is transferred to include the UK, Canada and the USA.

Some of our service providers and data processors are global companies who may transfer data outside of the EU such as for service support. This includes our cyber security services, for example. We pass personal information securely to our parent company Great-West Lifeco in Canada. We do this for administration purposes such as to support the transfer of information from Cornmarket to our underwriters and business partners. When we do

certain secure transfers these files temporarily reside on Canadian servers owned by Great West Life Co. We also pass personal information securely to our parent company Great-West Lifeco in Canada for screening our customers against Financial Sanctions and Politically Exposed Persons lists to comply with Anti-Money Laundering rules. Our parent company, Great-West Lifeco has a legal obligation to maintain a list of our identified high-risk customers.

Passing your personal information to certain countries, including the UK and Canada, is allowed under an Adequacy Decision made by the European Commission. Where we, our service providers, or our data processors, transfer your personal information outside the EU, we will take steps to ensure that your personal information is adequately protected and transferred in line with data protection law.

We use Model Standard Contractual Clauses for transfers of personal information outside of the EU to countries or regions without an Adequacy Decision, to ensure that any personal information leaving the EEA will be transferred in compliance with EU data protection law. These are available by contacting us.

## 10. HOW LONG DO WE KEEP PERSONAL DATA FOR?

We keep and use your personal information for as long as you have a policy contract/financial product or service through Cornmarket and for as long as you have a relationship with us. We also hold it after your relationship ends with Cornmarket where we need to for complaints handling, legal claims, the administration of Group Schemes, for system back-ups and for as long as we have to under regulations.

Where you have availed of a regulated product or service, we will retain your personal information for 7 years after the relationship has ended.

In some instances, where we have received your personal data from your union/association to assess your eligibility for automatic access to a Group Protection Scheme, we may determine that you are ineligible for membership of the Group Protection Scheme through automatic access. In these instances, we will retain your personal data for a period of up to 7 years to handle any queries you may have in respect of the outcome of our assessment, and to investigate and manage any complaints/disputes that may arise.

In some cases, deleting certain records including identifiers such as client number is not possible, while maintaining system integrity. Where this occurs, we have taken steps to de-personalise the personal information and limit the processing to maintaining this data securely.

## 11. WHAT ARE YOUR RIGHTS?

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details in Section 12 of this Data Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month. This period may be extended for a further 2 months. If we need this extra time to deal with your request, we will notify you of the fact that there will be a delay and the reasons for it within a month of your request being made. Any restrictions to your rights will be explained in our written response to your request.

### • Right to Information:

You have a right to the information set out in this Data Privacy Notice. The most recent version of our Data Privacy Notice will always be accessible on our website at [www.cornmarket.ie/data-privacy-notice](http://www.cornmarket.ie/data-privacy-notice). We will inform you of our updated Data Privacy Notice, if we change the type of personal information we collect and / or how we use it.

We have controls in place to protect your personal information and minimise the risk of security breaches. However, should any breaches result in a high risk for you, we will inform you without undue delay.

### • Right to Restrict or Object:

You can restrict or object to any unfair and unlawful collection or use of your personal information.

You can object to any fully automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person.

Where we state in this Data Privacy Notice that we process your personal data on the basis of a legitimate interest, you are entitled to object to the processing in question on grounds relating to your particular situation. We will then stop processing the personal data in question unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or unless we need to use it in relation to legal claims. Please note that if you object to us processing your data, we may not be able to provide certain services or benefits you would otherwise be entitled to under any insurance policy contract or financial product or service you have in place.

You can withdraw consent and object to the processing of your personal data, where this has previously been processed with your consent. For example, you can object to the use of your personal data for direct marketing purposes.

- **Right to Correct and Update:**

You can ask us to correct and update personal information we hold about you.

Some of the policies which Cornmarket administers, or services which Cornmarket provides, are long term contracts. It is important we have your up to date personal information, such as contact details to provide you with the best service. Please ensure to advise us of any updates to your personal data.

- **Right to Delete and Be Forgotten:**

You can have your personal information deleted if it is incorrect, if it is no longer needed or if it has been processed unfairly or unlawfully.

If you have withdrawn consent you can ask for your personal information to be deleted.

We will keep a record of your request so we know why your personal data was deleted.

If we have provided a regulated product or service to you, we must keep your personal information for a minimum period by law. Personal information gathered for other non-regulated products or services that we provide must also be kept for a minimum period by law.

- **Right to Portability:**

You can ask for a copy of all personal information that you gave us which is held by us in an automated format. This is only in relation to personal data that we process on the lawful basis of consent or for the purpose of entering or performing a contract and where the processing is carried out by automated means.

You can receive this in a machine readable format.

You may also request Cornmarket to send this personal information in a machine readable format to another company. The format will depend on our ability to provide this in a secure way that protects your personal information.

It is unlikely we will be able to use a copy of your personal information sent to us in this way. This is because we can only collect personal information that we need. We also need your most up to date personal information to comply with regulations.

- **Right to Access:**

You have the right to know what personal information we hold about you and to receive a copy of your personal information.

We must tell you:

- o why we hold it,
- o who we pass it to, including whether we transfer it outside the EU,
- o how long we keep it for,
- o where we got it from, and
- o if we carried out any automated decisions, and if so, the logic behind these and what it means for you.

This right does not allow you to access personal information about anyone else.

To access your personal information please write to us using the contact details in Section 12 of this Data Privacy Notice. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information.

## 12. HOW TO CONTACT US AND/OR OUR DATA PROTECTION OFFICER

If you have any questions about your personal information and this Data Privacy Notice or if you wish to exercise any of your rights, please contact us at:

**Address:** Cornmarket Group Financial Services Limited  
Christchurch Square  
Dublin 8  
**Telephone:** +353(0)1 4084000  
**Email:** [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

Cornmarket also has a Data Protection Officer who you can contact at:

**Address:** Data Protection Officer  
Cornmarket Group Financial Services Limited  
Christchurch Square  
Dublin 8  
**Telephone:** +353(0)1 4084000  
**Email:** [dataprotection@cornmarket.ie](mailto:dataprotection@cornmarket.ie)

### 13. COMPLAINTS

If you do not think that we have processed your personal information fairly or in line with this Data Privacy Notice, please contact us using the details in Section 12.

If you are not happy with how we have processed your personal information or handled your privacy rights, you can make a complaint to the Data Protection Commission by contacting them using the details below:

**Address:** Data Protection Commission,  
6 Pembroke Row,  
Dublin 2,  
D02 X963.  
**Telephone:** +353 (0)1 7650100/ 1800 437 737  
**Online:** <https://forms.dataprotection.ie/contact>  
**Email:** [info@dataprotection.ie](mailto:info@dataprotection.ie)

### 14. CHANGES TO OUR DATA PRIVACY NOTICE

We may update this Data Privacy Notice from time to time. Any changes will be published on this page [www.cornmarket.ie/data-privacy-notice](http://www.cornmarket.ie/data-privacy-notice).

**This Data Privacy Notice is effective from 16 January 2026**