

# Data Privacy Notice

# Cornmarket Insurance Services 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 Insurance Services Ltd. (Cornmarket) with our offices at Boucher Plaza, 4-6 Boucher Road, Belfast BT12 6HR is an insurance broker. We specialise in serving the insurance needs of affinity groups and membership organisations. Working closely with these affinities we help our customers find the right insurance products to suit their needs, with products such as car, home, travel, pet and GAP insurance. Cornmarket Insurance Services Ltd is a wholly owned subsidiary of Cornmarket Group Financial Services Ltd. Cornmarket Group Financial Services Ltd is a member of the Irish Life Group Ltd. which is part of the Great-West Lifeco Group of companies.

## 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.

## 3. WHAT INFORMATION WE COLLECT AND WHY (OUR LEGAL BASES FOR PROCESSING)

We use personal information, including special categories of personal data and other sensitive personal data (e.g. health information, union membership, driving convictions) to advise you about products and services we arrange and to administer these policies should you decide to go ahead with purchasing a policy through Cornmarket, to provide customer care, and service and to inform you of any relevant actions you may need to take.

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; and to manage our risks.

## 4. CONSENT AND HOW TO WITHDRAW CONSENT

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 through the relevant insurer who underwrites any policy you choose to go ahead with; or to take steps requested by you before you enter into your contract for a product or service provided through Cornmarket.

The information collected includes, but is not limited to, your name, date of birth, contact details and bank account details. We restrict access to, and the use of, special categories of data and other sensitive personal information.

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

- verify your identity and to verify the accuracy of the information we receive about you
- assess the information you have provided, and 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
- 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
- share your personal information with the relevant insurer to ensure that you have the appropriate cover in place
- provide you with information about your policy
- provide customer care and service – to administer your policy and make any changes during its term, answer queries, provide updates or process a cancellation
- contact you to inform you of any relevant actions you may need to take
- receive any payments in relation to your policy for onward transmission to the relevant insurer where relevant
- 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.

## **Required by law:**

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

- Reporting to regulators and other official government agencies
- Keeping proper books and records
- To manage and investigate any complaints.

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

We use our customers' personal information, including yours, to identify the target market for our regulated products and services.

When you give us your personal information we will check to see if we already have a record of you. This helps us to comply with your Data Protection rights. Please see Section 10 of this Data Privacy Notice for more details about your rights.

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

We use your personal information for our legitimate interests as shown below. We believe these uses benefit our customers. You can contact us if you have any questions using the contact details in Section 11 of this Data Privacy Notice.

### **• Call Recording:**

- For transacting business and for customer service purposes, we record and monitor calls. We let you know if a call is being recorded at the start of the call so you can decide whether to continue or not.

### **• Aggregate Analytics and Statistics:**

- We perform data analytics and statistical analysis on our products and customers to allow us 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 Statistics**

- 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, Workplace and Affinity Groups**

- We use details of your occupation, workplace and/or Affinity group membership to inform you about products and services that are suitable to 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.

### **• Direct Marketing**

- We would like to be able to contact you about offers and services where you have;
  - registered an interest for the particular offer or service
  - a similar product already with us
  - held the product with us previously
- Your information will not be passed on to third parties for the purposes of direct marketing.

### **• 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, detect and identify suspicious or fraudulent activities.

### **• Customer Queries and Service Requests:**

- After the product/service you have availed of through Cornmarket has ceased, when you or your appointed representative send us a query or 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.

- **With your consent:**

- You need to give consent for us to collect and use personal information classed as Special Category Data 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.

- **Health information**

- For accurate insurance premium quotations Cornmarket is required to ask for your consent to record related medical history. In the absence of your consent to our processing of your health information we may be unable to offer accurate quotations for motor and travel insurance.

- **Criminal Conviction Data**

- For accurate insurance premium quotations Cornmarket is required to ask for your consent to record criminal conviction data. In the absence of your consent to our processing of your criminal conviction information we may be unable to offer accurate quotations for general insurance.

- **Union Membership**

- We may 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.
- 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 to tell us whether you have visited our website before. We may also use cookies for third party advertising to show you Cornmarket ads where you have visited our website before or visited other websites offering similar products and services. We will ask for your consent to use these once you visit the website.
- For detailed information on the cookies we use and the purposes for which we use them please see our Website Privacy Statement available at <https://www.cornmarketinsurance.co.uk/privacy-statement/>

## 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 health information, criminal conviction data, or union membership and in relation to the receipt of direct marketing communications from us:

- By writing to:           Cornmarket Data Protection Officer  
                                  Cornmarket Insurance Services  
                                  Boucher Plaza  
                                  4-6 Boucher Road  
                                  Belfast  
                                  BT12 6HR
- By telephoning:       02890442200
- By emailing:           dataprotectionofficer@cornmarketinsurance.co.uk

## 6. AUTOMATED DECISION MAKING INCLUDING 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.

Where any automated decision making used by the insurer 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 or forms from your affinity partner, speak with us, complete a quotation on an insurance aggregator or visit our website and social media accounts. For more information on what personal information is collected and used on our website please see our Website Privacy Policy which includes information regarding our use of Cookies and is available at [www.cornmarketinsurance.co.uk/website-privacy-statement](http://www.cornmarketinsurance.co.uk/website-privacy-statement).

From time to time we also receive personal information from insurers, solicitors, your affinity partner, accountants, and other third parties you may have nominated in order to assist with policy administration, the processing of claims and for the resolution of complaints.

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

We pass personal information to:

### **• Insurers and Product Providers:**

- We share your personal information with the relevant insurer or product provider to process your applications, to ensure that you have the appropriate cover in place and to process claims where relevant.

### **• Your Authorised Representatives:**

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

### **• Regulators and other official agencies:**

- Regulators and other official agencies such as the Police or the Treasury or as needed to comply with regulations and laws and on foot of a Court Order or Subpoena.

### **• Data Processors:**

- 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. The categories of services that we use other Data Processors for include; prevention of fraud, document management and disposal, to facilitate the application process for cover, customer services, making and receiving payments and marketing.

### **• Affinity Partners**

- From time to time we may verify your membership of the affinity group we have used as the basis of your insurance offering. This is to ensure that only those entitled to a particular insurance scheme are covered by it or if membership is offered on the basis of registering for a quote with us.
- We may share your personal information with the relevant Affinity Partner to process your application, validate membership, administer customer service, resolve customer complaints, conduct market research, assess product adequacy and develop marketing campaigns.

### **• Credit Rating Agencies**

- In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). Where you take insurance services from us we may also make periodic searches at CRAs to manage your account with us.
- To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.
- We will use this information to:
  - Assess your creditworthiness and whether you can afford to take the product;

- Verify the accuracy of the data you have provided to us;
  - Prevent criminal activity, fraud and money laundering;
  - Manage your account(s);
  - Trace and recover debts; and
  - Ensure any offers provided to you are appropriate to your circumstances.
- We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.
  - When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.
  - If you chose to pay for your policy via instalments this constitutes a credit agreement, the CRA will then place a search footprint on your credit file that will be seen by other lenders.
  - The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail by clicking on any of the three links to the Credit Rating Agency Information Notices (CRAIN) below.

- CRAIN links:

TransUnion: [www.transunion.co.uk/crain](http://www.transunion.co.uk/crain)

Equifax: [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)

Experian: [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

## 9. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)?

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 YOUR 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, for system back-ups and for as long as we have to under regulations.

Information submitted for a quotation for general insurance (home, motor, travel or Pet insurance), where you choose not to go ahead with the policy will be retained by us for a period of up to 24 months from the date of the quotation.

After the periods set out above, we will de-personalise (anonymise) or delete the personal data. De-personalisation means that we will delete certain aspects of the information we hold which makes this identifiable (such as name and street address) so that we can no longer determine who it relates to. This results in the data no longer being considered personal data. 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. Likewise, if we have reason to refuse your request, we will notify you within a month of the refusal and the reason for it.

### **• Right to Information**

You have a right to the information set out in this 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 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 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 document 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 your insurance policy.

You can withdraw consent and object to the processing 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. 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 or has been processed unfairly or unlawfully.

If you have withdrawn consent you can ask for your personal information to be 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 held by us in an automated format. You can receive this in a machine readable format that allows you to keep it.

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.

We will not likely be able to use a copy of your personal information sent to us in this way from another company. This is because we can only collect personal information that we need. We also need your most up to date personal information for underwriting and 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:

- why we hold it,
- who we pass it to, including whether we transfer it outside the EEA,
- how long we keep it for,
- where we got it from; and
- 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**

You can contact us with any questions about your personal information and this Data Privacy Notice using the following details:

- By writing to:           Cornmarket Insurance Services  
                                  Boucher Plaza  
                                  4-6 Boucher Road  
                                  Belfast  
                                  BT12 6HR
- By telephoning:       02890442200
- By emailing:           dataprotectionofficer@cornmarketinsurance.co.uk

## **13. CORNMARKET'S DATA PROTECTION OFFICER**

Cornmarket also has a Data Protection Officer that you can contact directly using the following details:

- By writing to:           Cornmarket Data Protection Officer  
                                  Cornmarket Insurance Services  
                                  Boucher Plaza  
                                  4-6 Boucher Road  
                                  Belfast  
                                  BT12 6HR
- By telephoning:       02890442200
- By emailing:           dataprotectionofficer@cornmarketinsurance.co.uk

## 14. COMPLAINTS

If you do not think that we have processed your personal information in line with this Data Privacy Notice, please contact us directly at:

- By writing to: Cornmarket Data Protection Officer  
Cornmarket Insurance Services  
Boucher Plaza  
4-6 Boucher Road  
Belfast  
BT12 6HR
- By telephoning: 02890442200
- By emailing: [dataprotectionofficer@cornmarketinsurance.co.uk](mailto:dataprotectionofficer@cornmarketinsurance.co.uk)

If you are not happy with how we have processed your personal information or handled your privacy rights, you can also complain to the Information Commissioner's Office by contacting them using the details below:

**Information Commissioner's Office:** Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

**Telephone:** 0303 123 1113 or 01625 545 745

**Fax:** 01625 524 510

**Web:** <https://ico.org.uk/concerns/>

## 15. 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.cornmarketinsurance.co.uk/Data-Privacy-Notice](http://www.cornmarketinsurance.co.uk/Data-Privacy-Notice)

### **This Data Privacy Notice is effective from 1st October 2024.**

Cornmarket Insurance Services Ltd is a wholly owned subsidiary of Cornmarket Group Financial Services Ltd. Cornmarket Group Financial Services Ltd is a member of the Irish Life Group Ltd. which is part of the Great-West Lifeco Group of companies. Cornmarket Insurance Services Ltd is authorised by the Financial Conduct Authority in the UK and is regulated by the Central Bank of Ireland for conduct of business rules.

Version	Author	Reviewer	Effective Date
Version 1	Diarmuid Lavery	Joe Egan	22.05.2018
Version 2	Diarmuid Lavery		11.12.2019
Version 3	Diarmuid Lavery	Joe Egan	01.01.2020
Version 4	Diarmuid Lavery		19.02.2023
Version 5	Diarmuid Lavery		15.08.2024



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