

Privacy Notice

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Privacy Notice

This privacy notice explains how Vintage Corporate Ireland, uses any personal data that we may collect about you from you or your employer.

A. Purpose

Vintage Wealth International Limited trading as Vintage Corporate Ireland is committed to protecting and respecting your privacy. It is our aim is to explain:

- / why we collect your information;
- / what choices are available to you regarding the use of your data;
- / the security procedures in place to protect your data; and
- / how you can correct the information held about you.

Vintage Corporate Ireland is regulated by the Central Bank of Ireland. We provide advice on the following financial products:

- / Occupational Pension Schemes
- / Group Death in Service Schemes
- / Group Income Protection Schemes (permanent health insurance)
- / Group Serious Illness Schemes
- / Group Personal Retirement Savings Accounts (PRSA's)

We also arrange insurance products with life assurance companies. We currently operate an agency with Zurich Life Assurance plc.

During the life of an insurance policy, we will receive personal data relating to potential or actual policyholders, beneficiaries under a policy, their family members, claimants and other parties involved in a claim. This data is collected to allow us to provide advice on insurance products and services and to ensure we abide by legislation and various codes of conduct. References to "data subjects" in this notice include any living person, whose personal data is received in connection with the services we provide. This notice sets out how we use this personal data and who we may send it on to.

In this document "we", "us" and "our" means Vintage Wealth International Limited trading as Vintage Corporate Ireland.

For the purposes of General Data Protection Regulations (GDPR) the data controller is:

Vintage Corporate Ireland, F10, Bracetown Business Park, Clonee, Dublin 15.

Telephone: 1-800-938-984 Email: <u>data@vintagecorporate.ie</u>

All queries should be addressed to 'The Data Controller' by any of the above means.

Please take time to read this notice carefully. It sets out the basis on which any personal data collected from you, or that you provide, will be processed by us.

B. Personal information we collect

We will process (collect, store and use) the information you provide in a manner compatible with GDPR and will also endeavour to keep your information accurate and up to date and not keep it for longer than is necessary.

Personal data is collected and processed in the following way:

- / Data subject details name, address (and proof of address), other contact details (e.g. email and telephone details), gender, marital status, family details, date of birth, employer, job title and employment history, relationship to the policyholder, insured, beneficiary or claimant.
- / Identification details identification numbers issued by government bodies or agencies (e.g. PPSN, passport number, tax identification number, driver's license number).
- / Insured risk information about the insured risk, which contains personal data and may include, only to the extent relevant to the risk being insured; current or former physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g. smoking or consumption of alcohol), prescription information, medical history)
- / Policy details details about quotes and policies obtained for and by data subjects.
- Claims information about current and previous claims, which may include Special Category health data.
- / Marketing data where legitimate interest has been identified or if the individual has consented to receive marketing of our services.
- / Website usage details of your visits to our websites and information collected through cookies and other tracking technologies, including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

C. Source of personal data gathered

We collect and receive personal data from various sources, including (depending on the service provided):

- / Data subjects' employers
- / Data subjects and their family members, online or telephone, or in written correspondence

- Other insurance market participants, such as insurers, reinsurers and other intermediaries
- Anti-fraud databases and other third party databases, including sanctions lists
- / Claim forms
- / Third parties who introduce business to us and;
- / Forms on our website and your interactions with our website (please also see our Cookies Notice).

Call Recording and CCTV – Incoming and outgoing calls are recorded for training, quality and verification purposes. CCTV is utilised at our office.

Other people's data - 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.

Note: If you are providing information about another person Vintage Corporate Ireland expect you to show them this Privacy Notice and ensure that they have given you permission to provide this information to us so that a quote can be provided. If they have any concerns please ask them to contact 'The Data Controller'.

D. Marketing

Your data is used for legitimate business interests including marketing of our products and services by post, telephone (including mobile), email or other means of communication including social media. Where we wish to market other companies' products or services to you, we will first ask for your consent. If you no longer wish your information to be used for marketing purposes, please email us at data@vintagecorporate.ie or write to us at the contact details provided above.

E. Who we may share your data with

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

If we wish to pass your sensitive personal data on to a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

The third parties that we may pass your personal data to are:

- / Life Insurance Companies
- / Trustee Companies
- / Employers
- / Client Management System Providers

- Regulators including inter alia the Central Bank of Ireland and the Financial Services and Pensions Ombudsman, on their request
- / Law Enforcement agencies including An Garda Siochana if legally obliged to do so
- Other service providers contracted to Vintage Corporate Ireland including affiliated companies to whom we have outsourced certain aspects of the service we provide

If we transfer personal data to a third party or outside the EU we as the data controller will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available. You should be aware that we may pass your personal data to affiliated companies in the UK who may provide services to Vintage Corporate Ireland.

F. Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

Right of access – you have the right to request a copy of the information that we hold about you.

Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

Right to restriction of processing – where certain conditions apply to have a right to restrict the processing. Right of portability – you have the right to have the data we hold about you transferred to another organisation.

Right to object – you have the right to object to certain types of processing such as direct marketing.

Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

Right to judicial review - in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data.

G. How we use and disclose your personal data - Legal basis

In this section, we set out the purposes for which we use personal data, explain how we share the information, and identify the "legal grounds" on which we rely to process the information.

These "legal grounds" are set out in the GDPR, which allows companies to process personal data only when the processing is permitted by the specific "legal grounds" set out in the GDPR:

Performance of our contract with you	Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
For our legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular if you are a child. These legitimate interests are set out next to each purpose.
Your explicit consent	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting 'The GDPR Owner'. However, withdrawal of this consent may impact our ability to provide the services.

H. Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Vintage Corporate Ireland will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory bodies which include The Central Bank of Ireland and the Office of the Financial Services and Pensions Ombudsman and by our internal governance.

I. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Vintage Corporate Ireland or how your complaint has been handled, you have the right to lodge a complaint directly with the Office of the Data Protection Commissioner whose contact details are:

Website: https://www.dataprotection.ie/docs/

Contact-us/b/11.html

Telephone: +353 (0)761 104800 or Lo Call Number

1890 252 231

Fax: +353 57 868 4757
E-mail: info@dataprotection.ie
Postal Address: Data Protection Commission,

21 Fitzwilliam Square South, Dublin 2,

Do2 RD28, Ireland.

J. Changes to this notice

This Data Privacy Notice is valid from 01 June 2022. We may modify or update this Privacy Notice from time to time.



Vintage Wealth International Limited trading as Vintage Corporate Ireland is regulated by the Central Bank of Ireland. Registered in Ireland No. 676822. Registered office: F10, Bracetown Business Park, Clonee, Dublin 15. Call: 1800 938 984

Visit: vintagecorporate.ie

Find us at:

F10, Bracetown Business Park, Clonee Dublin 15