

# Privacy Policy Statement

QuoteDevil is committed to protecting and respecting your privacy.

It is the intention of this privacy policy statement to explain to you the information practices of QuoteDevil in relation to the information we collect about you and other users.

For the purposes of the GDPR the data controller is:

- QuoteDevil
- 22/23 Pembroke Street Upper, Dublin 2

Please read this Statement 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?

QuoteDevil.ie was set up in October 2006 to deliver quality insurance products in the fastest possible time and at the best rate we can provide. QuoteDevil currently provide **best quote Car Insurance**, Home, Commercial Vehicle, Travel, Wedding Insurance, Mortgage Protection Insurance, Life Insurance, Pet, Gadget and Motor Breakdown Insurance.

QuoteDevil's aim is simple - we provide great value to our customers by combining quality insurance products with excellent cover at the best price possible and in the fastest time possible.

On QuoteDevil.ie, you can get a quote in less than one minute and arrange instant home insurance cover on our site with no form filling! We'll even email your policy and bank indemnity letter to you - instantly.

The team behind QuoteDevil have over 40 years experience in the Insurance Market. Our home product is only sold online so we do not have the expenses that other providers have. This means that we can pass on savings to our customers.

QuoteDevil Ltd. is regulated by the Central Bank of Ireland and is a member of the Irish Brokers Association.

Our Data Protection Officer / GDPR Owner and data protection representatives can be contacted directly here:

- Gemma Keaveney
- DPO@quotedevil.ie
- 01 254 1300

## Purpose for processing your data

### Why do QuoteDevil Ltd need to collect and store personal data?

In order for us to provide you with a business insurance/ general insurance quote we need to collect personal or sensitive data for ***shopping all available insurance markets for the purpose of obtaining suitable business and general insurance quotes which match your requirements***. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes **QuoteDevil** would contact you for additional consent.

### How will QuoteDevil Ltd use the personal data it collects about me?

QuoteDevil will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

QuoteDevil is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

### Under what circumstances will QuoteDevil contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

## Why we are processing your data? Our legal basis.

Our reason and purpose for processing your personal data is:

- We have your **consent**
- We need to process your data to complete the **performance of a contract** where you, the data subject is a party. *QuoteDevil processes data without consent in order to fulfil contractual obligations [such as bank details to process salaries, postal address in order to supply products and services, etc.].*
- **legal obligation** that needs to meet
- protect the **vital interests of the data subject**, including the protection of rights and freedoms
- necessary for the **legitimate interests of the data controller** or third party, unless the processing is overridden by the vital interests, including rights and freedoms

## Special Categories of personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin - financial information is not classified as special categories of personal data) - we will ensure the below

- we will obtain your explicit consent
- ensure the personal data is necessary for employment rights or obligations;
- protect the vital interests of the data subject, including the protection of rights and freedoms;
- necessary for the legitimate activities with appropriate safeguards;
- personal data made public by the data subject;
- legal claims;
- substantial public interest;

- preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, provision of health or social care treatment, or management of health and social care systems and services, under the basis that appropriate contracts with health professionals and safeguards are in place;
- public health, ensuring appropriate safeguards are in place for the protection of rights and freedoms of the data subject, or professional secrecy;
- national laws in terms of processing genetic, biometric or health data.

## Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to QuoteDevil 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 fulfill the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with QuoteDevil's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise

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.

## Data Subjects Rights:

We, QuoteDevil facilitate the data subject's rights in line with the data protection policy and the subject access request procedure. This is available on request from [DPO@quotedevil.ie](mailto:DPO@quotedevil.ie)

### 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. You have the right to complain as outlined in clause 3.6 below.

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.

## **Additional information we are providing you with to ensure we are transparent and fair with our processing**

### **Retention of your personal data**

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. QuoteDevil will process personal data in accordance with our retention schedule. This retention schedule has been governed by our regulatory body (Central Bank of Ireland) and our internal governance.

### **Withdraw consent**

If we are relying on your consent to process your data you can withdraw this at any time – this does not affect the lawfulness of processing based on your consent before its withdrawal.

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by QuoteDevil (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and QuoteDevil's data protection representatives - [DPO@quotedevil.ie](mailto:DPO@quotedevil.ie)

## Failure to provide further information if need see Art 12(e)

If we are collecting your data for a statutory requirement (payroll) or to fulfill a contract (life policy or insurance policy) and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

## Additional Processing

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

## Responsibilities

The Data Protection Officer/GDPR Owner is responsible for ensuring that the privacy notice(s) is correct and that mechanisms exist such as having the Privacy Notice(s) on QuoteDevil website to make all data subjects aware of the contents of this notice prior Organisation Name commencing collection of their data.

All staff that need to collect personal data are required to follow this procedure.

## Questions Regarding the Privacy Statement and Conditions of Use

If you have any questions about our Privacy Statement and Conditions of Use, or the use of this Site in general, please contact us by e-mail at [DPO@quotedevil.ie](mailto:DPO@quotedevil.ie)

## **Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:**

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.