

PRIVACY STATEMENT

This Privacy Statement (**Statement**) is presented to you by Capstone Financial Services Limited, trading as Agria Petinsure and Petinsure of Ulysses House, 23/24 Foley Street, Dublin 1, Dublin, D01 W2T2, Ireland (company registration number 451193) (**Capstone, we, us and our**). Capstone is the controller of your personal data when you visit the website www.petinsure.ie, when you take out an insurance policy with us and/or when you avail of our other services. Capstone is committed to ensuring that your privacy is protected.

This Statement sets out the personal data that we process about you, the legal bases according to which we process such personal data, and how and why we process it. Please read this Statement carefully to understand our practices regarding your personal data and how we will treat it. This Statement is being provided to you in line with our obligations under the General Data Protection Regulation (**GDPR**), the Data Protection Acts 1988 to 2018 and other applicable data protection law.

CONTACT DETAILS

If you would like to contact us with any queries or comments in relation to our processing of your personal data, or to exercise your rights as a data subject (set out below), please:

- Send an e-mail to: info@petinsure.ie
- Send a letter to: **Capstone Financial Services T/A Petinsure PO Box 911, South City D.S.U, Cork;** or
- Call our Cork office: **021 202 9119**

You can also contact the Data Protection Officer (DPO):

- Send an e-mail to: denis@deniscroombs.ie
- Call the DPO office: **038 617 29 383**

PERSONAL DATA WE COLLECT AND PROCESS

As used in this notice, “personal data” means any information relating to a living individual who can be identified directly from that information or indirectly in conjunction with other information which we may hold or have access to. “Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We will collect and process the following categories of personal data about you:

- Personal data that we collect directly from you:
 - **Identification Information:** your title, name, address, date of birth;
 - **Contact Information:** your address, e-mail address and phone number;
 - **Insurance Policy Information:** your bank account and/or credit card information and information on your pet/pet ownership;
 - **Technical Information:** such as your IP address, domain name, hardware, operating system, browser, system activity, internal and external information related to website pages that you visit, clickstream information and geolocation data; and
 - **Correspondence Information:** information that you may give us by corresponding with us by post, phone, e-mail or through our website.

You are not obliged to provide us with your personal data. However, if you do not, we will not be able to carry out the services you have requested of us.

HOW AND WHY WE PROCESS YOUR PERSONAL DATA

We process your personal data for the following purposes and in accordance with the following legal bases:

CATEGORIES OF PERSONAL DATA	PURPOSES OF PROCESSING	LEGAL BASIS FOR PROCESSING
<ul style="list-style-type: none"> • Identification Information • Contact Information • Insurance Policy Information • Correspondence Information 	<ul style="list-style-type: none"> • To provide you with an insurance policy. • To enable us to provide you with a quotation for the insurance services you have enquired about and/or requested from us. • To perform the services you request of us. • To administer your insurance policy. • To process a claim under your insurance policy. 	<ul style="list-style-type: none"> • To enter into and perform our contract with you for an insurance policy. If you do not provide this personal data, then we may not be able to contract with you and provide you with an insurance policy or services. • In pursuit of our legitimate interests in processing business (to the extent that such legitimate interests are not overridden by your interests or fundamental rights and freedoms).
<ul style="list-style-type: none"> • Identification Information • Contact Information • Correspondence Information 	<ul style="list-style-type: none"> • To communicate with you and take such action as we deem appropriate in light of your communications. 	<ul style="list-style-type: none"> • In pursuit of our legitimate interests in communicating with you (to the extent that such legitimate interests are not overridden by your interests or fundamental rights and freedoms).
<ul style="list-style-type: none"> • Technical Information 	<ul style="list-style-type: none"> • To provide you with access to our website. • To protect the security and integrity of our website, systems and services. • To optimise and enhance our website. 	<ul style="list-style-type: none"> • In pursuit of our legitimate interests in making this website available (to the extent that such legitimate interests are not overridden by your interests or fundamental rights and freedoms).
<ul style="list-style-type: none"> • Identification Information • Contact Information • Insurance Policy Information • Investigations Information 	<ul style="list-style-type: none"> • To determine the legitimacy of claims. • To investigate where we suspect claims may be fraudulent. • Risk management, compliance and audit purposes. • For anti-money laundering purposes. 	<ul style="list-style-type: none"> • In pursuit of our legitimate interests in ensuring that we only pay out on legitimate claims and identify fraudulent activity (to the extent that such legitimate interests are not overridden by your interests or fundamental rights and freedoms). • To comply with our obligations under law, including in particular the European Union (Insurance Distribution) Regulations 2018 (as amended), the Consumer Insurance Contracts Act 2019 (as amended), the Central Bank Acts 1942-2015 (as amended), any regulations, codes and requirements implemented pursuant to the Central Bank Acts 1942 – 2015 (as amended) and any other law or guidance applicable to us as an insurance intermediary.

<ul style="list-style-type: none"> • Identification Information • Contact Information 	<ul style="list-style-type: none"> • To send you marketing materials providing you with information about services we offer. • To invite you and allow you to participate in events organised by us or our partners. • To notify you of changes to our services. 	<ul style="list-style-type: none"> • On the basis of your consent, where you opt-in to receive such marketing materials. • In pursuit of our legitimate interests in promoting similar services to services you have previously contracted for (to the extent that such legitimate interests are not overridden by your interests or fundamental rights and freedoms).
<ul style="list-style-type: none"> • Identification Information • Contact Information • Insurance Policy Information • Correspondence Information • Investigations Information 	<ul style="list-style-type: none"> • To ensure our compliance with our relevant regulatory obligations as an insurance distributor. • For the purposes of completing suitability and needs assessments for customers purchasing insurance. • For the purposes of reporting, preparing, adopting and implementing governance requirements including, but not limited to, the preparation of compliance materials, policies and procedures. • For the purposes of disclosing information to the Central Bank of Ireland, which has been formally and/or informally requested from time to time. 	<ul style="list-style-type: none"> • To comply with our obligations under law, including in particular the European Union (Insurance Distribution) Regulations 2018 (as amended), the Consumer Insurance Contracts Act 2019 (as amended), the Central Bank Acts 1942-2015 (as amended), any regulations, codes and requirements implemented pursuant to the Central Bank Acts 1942 – 2015 (as amended) and any other law or guidance applicable to us as an insurance intermediary.

RECIPIENTS WE MAY SHARE YOUR PERSONAL DATA WITH

We may share your personal data with members of our corporate group, agents, contractors or partners of Capstone in connection with services that these individuals or entities perform for or with Capstone. These include but are not limited to, insurance companies from whom we receive insurance products, data storage providers, systems administrators and developers, payments processors, providers of archiving services, private detectives, barristers, third party experts, accountants, financial and tax advisors or external auditors or any other third-party provider who assists us in the provision of our services to you and to our insurance partners. We may disclose your data in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. We may disclose or share your data in order to comply with any legal obligation or in order to enforce or apply our General Terms and Conditions.

We may transfer your personal data outside of the European Economic Area (**EEA**) for storage and to our partner companies and other recipients. Whenever we transfer your personal data outside of the EEA to a third country which has not been determined by the European Commission to provide an adequate level of protection of personal data, we will ensure appropriate safeguards are in place. Specifically, we have the European Commission approved Standard Contractual Clauses (**SCCs**) in place with entities who process personal data on our behalf outside of the EEA. You may contact us via e-mail, letter or telephone in case you wish to find out more or to obtain a copy of the appropriate safeguards.

DATA SECURITY

We take our data security responsibilities seriously, employing the most appropriate physical and technical measures, including staff training and awareness. We review our data security measures and procedures regularly. Unfortunately, the transmission of information by means of the internet, including through e-mail, is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to or from us by means of e-mail and any such transmission is at your own risk.

DATA RETENTION

In general we will only keep your personal data for as long as is necessary for the purpose for which it is collected and for a reasonable period of time thereafter. Where we process your personal data in connection with a contract with you, we will typically retain your personal data for as long as is necessary to fulfil our obligations to you under the terms of the contract plus a reasonable period of time thereafter. In the case of insurance provision, we are required to hold your personal data for a period of 6 years post termination of our contract with you. Once we have determined that we no longer need to retain your personal data, we will delete it from our systems. However in relation to all personal data which we process, we may retain it for a longer period of time if we require it in relation to a legal claim or if we are required to retain it by applicable law/regulation.

COOKIE POLICY

Our site uses cookies – small text files that are placed on your device to help the website provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this website and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the About Cookies website (www.aboutcookies.org) which offers guidance for all modern browsers.

DIRECT MARKETING

We may contact you by post, email and/or telephone about our services and other events involving or relating to us which may be of interest to you, either because you have opted-in to receiving such material or because we obtained your contact information in the course of selling to you a service similar to that which we are marketing to you. You have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right, please send us an email to info@petinsure.ie with a header that says “Unsubscribe” or use the “Unsubscribe” button in any such email.

YOUR RIGHTS

As a data subject, you have the right to request that we:

- inform you whether we process your personal data, provide you with details relating to our processing, and with a copy of your personal data;
- rectify any inaccurate personal data or complete any incomplete personal data we might have about you;
- erase your personal data;
- restrict our processing of your personal data; and
- furnish you with the personal data which you provided to us in a structured, commonly used and machine-readable format.

Where we process your personal data solely on the basis of your consent, you are entitled to withdraw your consent at any time. This will not affect the lawfulness of our processing before the withdrawal. You also have the right to object to your personal data being processed on the basis of our legitimate interests (or those of a third party). We will cease processing your personal data, unless the processing is based on compelling legitimate grounds or is needed for the exercise or defence of legal claims.

These rights are not absolute and the exercise of your rights might be subject to certain conditions prescribed by law. We might require further information from you before we can respond to your request. You may exercise your rights by contacting us via the Contact Details provided above.

You also have the right to lodge a complaint with the Data Protection Commission (**DPC**). Contact details for the DPC are available at <https://dataprotection.ie/en/contact/how-contact-us>.

CHANGES TO STATEMENT

We may update this Statement from time to time; we will publish the updated version on our website.