



# **Data Protection & Privacy Policy**

Sheridan Insurances is committed to protecting your privacy. Please read our Data Protection & Privacy Policy below so that you understand how Sheridan Insurances may process and protect personal information that we may obtain about you ('Customer Data'), the circumstances in which we may disclose it to anyone, the choices you have regarding our use of the information and your ability to correct the information. If you have any comments, queries or suggestions about our Data Protection & Privacy Policy or the level of security practices of Sheridan Insurances, or you wish to change, modify, update or remove your Customer Data, contact us by email at [info@sheridan.ie](mailto:info@sheridan.ie) or via postal mail by writing to the Data Protection Officer, Sheridan Insurances Ltd, 93 North Main Street, Wexford.

- **Collection and Use of Customer Data**

Sheridan Insurances uses your Customer Data for the provision and administration of insurance products and related services. Examples of the actual or possible uses of your Customer Data are: processing your insurance application, handling claims, statistical analysis, fraud prevention, market research, risk management and provision of advice.

Your Customer Data may also be used by Sheridan Insurances to provide you with information about products and services from us or other products and services which are arranged for you by us with other companies within the Sheridan Insurances or with a third party.

You may be required to provide Sheridan Insurances with sensitive personal data e.g. information relating to your physical or mental health or the commission or alleged commission of or prosecution for an offence ('Sensitive Data'). Sheridan Insurances is committed to protecting the privacy of Sensitive Data and will only use Sensitive Data in a manner consistent with this Data Protection & Privacy Policy.

This processing of information applies to both our online and off line work practices.

By disclosing your Customer Data to Sheridan Insurances you indicate your consent to the collection, storage, processing, use and destruction of your Customer Data by us as described in this Data Protection & Privacy Policy.

- **Disclosure of Customer Data**

Sheridan Insurances considers your Customer Data to be private and confidential. Sheridan Insurances may sometimes disclose information about you to insurers, agents or service providers, regulatory bodies in connection with the provision of services to you. Sheridan Insurances access and/or disclose your Customer Data if required to do so by law or in the good faith and belief that such action is necessary to: (a) conform with the law or comply with legal process served on Sheridan Insurances; (b) protect and defend the rights or property of Sheridan Insurances including, without limitation the security and integrity of our network; or (c) act under pressing circumstances to protect the personal safety of users of our services or members of the public.



- **Retention of Customer Data**

Appropriate security measures are taken against unauthorised access to, alteration of, disclosure or destruction of the data. All waste paper, printouts, etc are disposed of carefully. It is the policy of Sheridan Insurances to retain your Customer data for a period of 6 years for the purpose of providing insurance products and related services to you and in order to meet the obligations placed on us by Insurers and the Financial Regulator under the Consumer Protection Code. Our Data Protection Officer is assigned with the specific responsibility for ensuring that files are regularly purged.

Security of stored documents is assured by alarmed buildings along with secure window locks, mortice deadlocks on external doors and secure locks on all internal server and storage rooms.

- **Access to and Rectification of your Customer Data**

You are entitled to copies of your Customer Data held by us as the data controller. We will provide you with a copy of the Customer Data kept by us as soon as may be possible and in any event not more than 40 days after the request in writing. To access your data, a fee of €6.35 is chargeable under the terms of the Data Protection Acts and cheque should be made payable to Sheridan Insurances. All requests should be addressed to the Data Protection Officer, Sheridan Insurances Ltd, at the address mentioned above. If the information we hold about you is inaccurate, please let us know and we will make the necessary amendments and confirm that these have been made within 40 days of receipt of your request. We will hold on to your Customer Data for as long as necessary for the purposes of providing insurance products and related services to you.

- **Security & Protection of Customer Data**

Sheridan Insurances is committed to processing and protecting the security of customers' personal information (Customer Data). We use a variety of security technologies and procedures to help protect the customer data from unauthorised access, alteration, use, disclosure, accidental loss or destruction. For example, we store the personal information provided by the customer on computer systems with limited access, which are located in controlled facilities. When we communicate with our customers using electronic media, we have appropriate arrangements in place to ensure the secure transmission of information to, and receipt of information from our customers. When we transmit highly confidential information (such as a credit card number) over the internet, we protect it through the encryption and secure servers. As effective as modern security practices are, we cannot guarantee the complete security of our database, nor can we guarantee that information supplied by customers won't be intercepted while being transmitted to us over the Internet. Sheridan Insurances will continue to revise policies and implement additional security features as new technologies become available.



- **Destruction of Customer Data**

The protection of confidential Customer data is our main priority. Our policy is to ensure that all documents are safely and securely destroyed and will discard all confidential data such as customer information, financial documents, employment records etc.

In order to meet this, we have outsourced the services of destruction of all our confidential documents to an external provider, Datashred who are assigned the task of collection, transportation and destruction of confidential documents in an efficient and secure manner. Once our order for destruction is logged, onto the Datashred system, it is assigned a unique **Barcode** and **Security Seal** that are tracked electronically throughout the entire process.

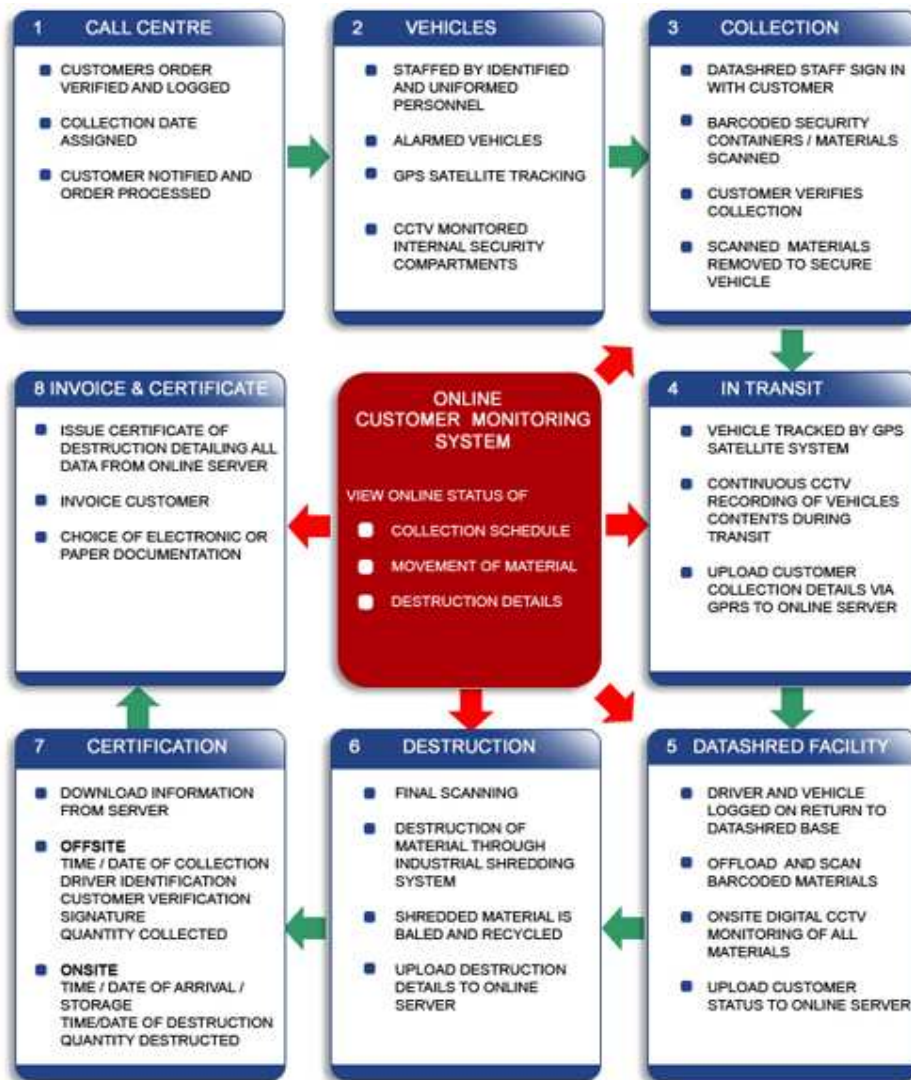
To comply with our legal obligations, the safe management and final destruction of personal information is monitored and recorded at all times. The Datashred unique **Online Customer Monitoring System** allows us to track the movement of our documents, from collection to destruction. On completion of our order, Datashred issue us with a Certificate of Destruction detailing information on all collection, transportation and destruction activities carried out by Datashred on our behalf.

- **Destruction Process**

Secure consoles/containers supplied from Datashred are placed in a common area throughout the offices of Sheridan Insurances. These containers are key locked and the keys are held by competent persons such as team leaders / managers in our offices. Collection of the secure containers is on an agreed regular schedule (fortnightly) under monitored and controlled conditions.

From the moment Datashred collect our data to the time it is shredded Datashred electronically track and record each stage through their integrated monitoring systems which includes CCTV surveillance and monitored door entry systems. At the end of the process Datashred issue Sheridan Insurances with a Certificate of Destruction detailing each element involved. Sheridan Insurances can track the movement of our documents at all times by way of our unique Online Monitoring System via the Datashred website using our individual password.

See below for detailed summary of the destruction process.





- **Changes to the Data Protection & Privacy Policy**

Sheridan Insurances reserves the right to change this Data Protection & Privacy Policy from time to time at its sole discretion. If we decide to make any changes, we will post these changes to our website [www.sheridan.ie](http://www.sheridan.ie) so that you will always know what information we gather, how we might use the information and in what circumstances we will disclose it to anyone. By continuing to use Sheridan Insurances after we post any changes, you accept and agree to this Data Protection & Privacy Policy, as modified.

- **Insurance-Link Central Register**

The Insurance-Link Central Register is maintained by Insurance companies. This is a claims information database. It is part of the Insurance Federations campaign in the fight to eradicate fraudulent claims. Details of claims are entered into the system and a programme is run to identify any “matches” - for example if the claimant has made multiple claims or if there are any similarities between claims. While matches do not necessarily imply that fraud has taken place, they will alert the insurer to take a closer look at the claims involved. Where appropriate, information may be passed to relevant enforcement agencies. You have a right of access to Customer Data held about you by Insurance-Link Central Register. For more information write to the Irish Insurance Federation, 39 Molesworth, Street, Dublin 2.

- **Claims History**

Under the conditions of your policy you must tell us about any Insurance related incidents (such as fire, water damage, theft or an accident) whether or not they give rise to a claim. When you tell us about an incident we will pass information relating to it to a database. We may search these databases when you apply for insurance, in the event of any incident of claim, or at time of renewal to validate your claims history or that of any other person or property likely to be involved in the policy or claim. You should show this notice to anyone insured under the policy.