

Privacy Policy

1. Who we are
 - a. This privacy notice (the “Privacy Notice”) applies to all personal information processing activities carried out by Earston Ltd trading as Covered.ie (“Covered.ie”).
 - b. Earston Ltd is a private company limited by shares, trading as Covered.ie. Covered.ie is a data controller in respect of personal information that we process in connection with our business (including the products and services that we provide). In this notice, references to “we”, “us” or “our” are references to Covered.ie.
 - c. Our registered address is Townyard House, 5 Townyard Lane, Malahide, Co Dublin and our contact details can be located at Covered.ie
 - d. We respect individuals’ rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business. “Personal information” means information about a living individual who can be identified from that information (either by itself or when it is combined with other information).
 - e. We may update our Privacy Notice from time to time, by communicating such changes to you and publishing the updated Privacy Notice on our website www.covered.ie. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.
2. The information we process
 - a. We collect various categories of personal information about you which you have provided to us. References to “you” or “your” may include information you have provided to us about yourself and/or your spouse, partner or another person you wish to include in an application. Personal information includes:
 - i. Your name, email address, phone number, date of birth and contact details.
 - ii. The IP address used by you to access our website.
 - iii. Details of medical conditions you have told us about.
 - iv. Your bank details, where payment information is required.
 - v. See the section **Data Storage & Retention Periods** for details of where we store your personal information and how long we will retain it before deleting it.
 - b. As part of an application for life insurance you may be required to provide Special Category information such as physical information and information about your physical and mental health.
 - c. We use cookies on our website for analysis and to help improve the user experience. If you would like to learn more about the specific cookies used or change your cookie preferences then
 - i. You may refuse to accept or you may disable cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website or unable to avail of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.
 - ii. For further information on cookies and how you can adjust settings in your browser, click 'HELP' on your browser or visit www.allaboutcookies.org.
 - iii. If you have any queries about our cookies please contact us at info@covered.ie
 - d. It is necessary for us to make use of automated decision making in order to offer you quotations for financial services like life insurance.
3. Your rights

- a. You have various rights regarding your personal information, if you wish to exercise any of these rights then please make contact with us. Your rights include:
 - i. Right of Access – you have a right to obtain a copy of all of your personal information held by us free of charge, other than in exceptional circumstances. We will provide this within one month of the request, having validated your identity.
 - ii. Data Portability – you have the right to receive a copy of your personal information free of charge in a form which can be provided to another company. We will provide this within one month of the request, having validated your identity.
 - iii. Right of Rectification – where there is an error in the personal information we hold about you we will correct it.
 - iv. Right of Erasure – where we are holding your personal information longer than is necessary or not in accordance with our retention policy, you have the right to request that we erase that data, free of charge.
 - v. Right to Complain – you have the right to complain to the Data Protection Commissioner.
 - vi. Right to Damages – in the event of a data breach, you have the right to claim damages and to take legal action against us.
4. How we use and share your personal information.
 - a. We will share your personal information with any insurance company for whom we hold an agency for the purposes of arranging an insurance policy.
 - b. Your information may be processed by third parties for the purposes of allowing us to provide you with the services you have requested. For example:
 - i. Our telecoms provider will store call recordings on our behalf.
 - ii. A provider of live chat will store details of web chat including any information you may have provided as part of that chat.
 - iii. Our email provider will store any emails sent between you and us.
 - c. We may store your personal information overseas where:
 - i. the European Commission has decided that the country or the organisation we are sharing your information with will protect your information adequately
 - ii. the transfer has been authorised by the relevant data protection authority or we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the European Commission) to ensure your information is adequately protected.
5. How we handle communications with you
 - a. Once you have initiated the process of applying for a life insurance product or other financial service, we will contact you by email, phone or by post to advise and assist you.
 - i. As such communication is necessary for us to arrange a contract of insurance we will not seek your further consent to make such communications.
 - ii. If you do not wish to continue with the application we will cease attempting to contact you and your personal information will be deleted in accordance with our retention policy in table 1.
6. Data Security
 - a. We take data security very seriously and take appropriate measures to ensure your personal data is only accessible by authorised people and is not lost, damaged or misused.
 - b. Electronic data is protected from unauthorised access by use of firewalls.

- c. Electronic data is backed up routinely such that in the event of a technical incident, it can be recovered in a timely manner.
 - d. Anti-virus systems are used to further ensure no unauthorised modification of data.
- 7. Purposes of Processing
 - a. We rely on the following bases for processing your personal information:
 - i. Contractual Necessity – where the information you give us either forms part of a contract or is intended to lead to the forming of a contract, for example, an application for a life insurance policy.
 - ii. Legal Obligation – where we are required by law to retain and process your personal information, for example in order to comply with regulatory requirements.
 - iii. Consent – where we wish to store your personal information to use for marketing purposes, we will ask for your permission to do so on an opt-in basis and will allow you to later opt-out.
- 8. Data Storage & Retention Periods
 - a. Primary Client Database
 - i. Where the sales process is completed and a policy or product issued, we will retain your personal data for six years after the expiration of the policy or product.
 - ii. Where the sales process is not completed, we will retain your personal data for one month after our latest contact with you.
 - b. Database Backups
 - i. Database Backup files will be retained for one year
 - c. Call Recordings
 - i. For one month after the recording was made these calls may only be accessed by the person responsible for training and quality.
 - d. Email
 - i. Emails between you and our staff will be accessible by the person to whom the email was sent and our Compliance Officer for a period of six years after the expiration of the policy or product we arranged for you or one month where no sale was completed
 - e. Paper Records
 - i. While an application is in progress, we will store any paper documents in a locked cabinet while not in use.
 - ii. Where the sales process is completed and a policy or product issued, we will archive paper application forms with a specialist archival service for six years after the expiration of the policy or product.
 - iii. Where the sales process is not completed, we will shred any paper documents within one month.
 - f. Server Logs
 - i. When you visit our website we store your IP address and non-personal information about your visit in server log files.
 - ii. Log files are deleted after one month.
 - g. Employee Data
 - i. Data provided by employees is limited to that which is required by law.
 - ii. Data will be retained for up to ten years after the person has ceased to be an employee of Covered.ie in order to comply with statutory requirements.