

## Privacy Policy

Capstone Financial Services T/A PetInsure is committed to ensuring that Your privacy is protected.

This statement sets out the basis on which any personal data We collect from and about You, or that You provide to Us, will be processed by Us. Please read the following carefully to understand Our views and practices regarding Your personal data and how We will treat it. This statement is being provided to You in line with Our obligations from 25 May 2018 under the General Data Protection Regulation (GDPR).

### CONTACT DETAILS

If You would like to contact Us with any queries or comments in relation to Your personal data, please:

Send an e-mail to: [info@capstonegroup.ie](mailto:info@capstonegroup.ie)

Send a letter to: Capstone Financial Services T/A PetInsure PO Box 911, South City D.S.U, Cork.

Call Us: Cork Office: 021 202 9119

### DATA WE COLLECT AND PROCESS

We will collect and process the following data about You:

#### Information You give Us

This is information about You that You give Us by corresponding with Us by post, phone, e-mail or through Our website. It includes the information You supply Us with when You engage Us to provide insurance services. The information You give Us may include, but is not limited to, Your title, name, address, e-mail address, date of birth, phone number, bank account and/or credit card information as well as any information relating to Your Pets etc.

#### Information We collect about You

Depending on the circumstances, We might also obtain personal data about You from other sources such as public registers, government and regulatory authorities, business partners, financial and insurance advisors, service providers, etc. You are not obliged to provide Us with Your personal information. However, if You do not, We will not be able to carry out the services You have requested of Us.

## WHY WE PROCESS YOUR DATA

We process Your data in order to:

- 1) Comply with legal obligations to which We are subject,
- 2) To perform the services, You have requested of Us or to take steps at Your request prior to undertaking to provide services for You.
- 3) To perform the services as requested of Us by Our insurance partners including but not limited to claims processing and payments, fraud detection, Payments processing and other general insurance Policy administration functions

We do this because You have consented to Our processing and controlling of Your data or for the purposes of Our legitimate interests, such as to inform You of changes to the services which We provide to You or to provide You with information about other services We offer.

## HOW WE USE YOUR DATA

We gather and Use Your information to:

- allow Us to provide You a quotation for the insurance services You have enquired about and/or requested from Us
- comply with legal obligations We might be subject to (such as anti-money laundering)
- provide You with information about other services We offer that are similar to those You have already requested of Us or enquired about
- to notify You of changes to Our services
- to monitor and improve the quality of Our services
- to allow You to participate in Events organised by Us or Our partners.

## WHO WE SHARE YOUR DATA WITH

We may share Your information with agents, contractors or partners of Capstone Financial Services T/A PetInsure in connection with services that these individuals or entities perform for or with Capstone Financial Services T/A PetInsure. 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. Our agents, contractors or partners are restricted from using Your data in any way other than to provide services for Capstone Financial Services T/A PetInsure, or services for the collaboration in which they and Capstone Financial Services T/A PetInsure are engaged.

## 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 data transmitted to or from Us by means of e-mail and any such transmission is at Your own risk.

## DATA RETENTION

It is Our aim to only hold Your data for as long as this is necessary to fulfil Our obligations to You under the terms of Our contract with You or for as long as is required of Us by law/regulation – whichever is the sooner. In the case of insurance provision, We are required to hold Your data for a period of 6 years post termination of Our contract with You.

## COOKIE POLICY

This site uses cookies – small text files that are placed on Your machine to help the site 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 site 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 which offers guidance for all modern browsers.

## MARKETING

We may contact You by post, email and telephone about Our services and other Events involving or relating to Capstone Financial Services T/A PetInsure which may be of interest 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 [privacy@capstonegroup.ie](mailto:privacy@capstonegroup.ie) with a header that says “Unsubscribe”.

## WHERE WE STORE YOUR INFORMATION

We might store Your information in different places. Some physical files are stored in Our offices and maybe Our archives. Electronic files are stored on Our secure servers and in the cloud. We may transfer Your data to, and store it at, a destination outside of the European Economic Area. Whenever We transfer Your data in such a way, We will ensure appropriate safeguards are in place. 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.

## YOUR RIGHTS

You have the right to request that We:

- inform You whether We process Your data, provide You with details relating to Our processing, and with a copy of Your data
- rectify any inaccurate data We might have about You without undue delay
- complete any incomplete information about You.
- erase Your personal data without undue delay
- are restricted from processing Your data
- furnish You with the personal data which You provided to Us in a structured, commonly Used and machine-readable format

Where We process Your 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 lodge a complaint with the Data Protection Commissioner at any time. The exercise of Your rights might be subject to certain Conditions prescribed by law and We might require further information from You before We can respond to Your request. You may exercise Your rights by contacting Us at the addresses or e-mail address provided above.

## CHANGES TO STATEMENT

We may update this privacy statement from time to time and will publish such updated version on Our Website, as appropriate.