

Cornmarket Retail Trading Ltd.

Data Privacy Notice

Data Privacy Notice

WHO WE ARE	2
WHAT IS A DATA PRIVACY NOTICE & WHY IS IT IMPORTANT?	2
WHAT INFORMATION WE COLLECT AND WHY (OUR LEGAL BASES FOR PROCESSING)	2
CONSENT AND HOW TO WITHDRAW CONSENT	3
HOW AND WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?	3
WHO DO WE PASS YOUR PERSONAL INFORMATION TO?	4
DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EEA?	4
HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?	4
WHAT ARE YOUR RIGHTS?	4
HOW TO CONTACT US	6
COMPLAINTS	6
CHANGES TO OUR DATA PRIVACY NOTICE	6

1. WHO WE ARE

Cornmarket Retail Trading Limited (Cornmarket) provides the Cornmarket Tax Return Service. It is a wholly owned subsidiary of Cornmarket Group Financial Services Limited. Its head office is located at Christchurch Square, Dublin 8. Cornmarket Group Financial Services Limited is a member of the Irish Life Group Ltd. which is part of the Great-West Lifeco Group of companies.

2. WHAT IS A DATA PRIVACY NOTICE & WHY IS IT IMPORTANT?

We know your personal information is important to you and it is important to Cornmarket too. This Data Privacy Notice tells you what we use your personal information for and explains your rights around how we use it. Please read this Data Privacy Notice to understand how and why we use your personal information.

If you give us personal information about someone else, please make sure you have their permission and make them aware of this Data Privacy Notice.

3. WHAT INFORMATION WE COLLECT AND WHY (OUR LEGAL BASES FOR PROCESSING)

We use personal information, including special categories of personal data and other sensitive personal data (e.g. health information, union membership, Personal Public Service (PPS) Number) to provide you with the Cornmarket Tax Return Service. We must have a lawful basis to collect and use personal information. These legal bases are explained below:

Necessary for the performance of a contract:

We need to collect and use your personal information to provide you with the Cornmarket Tax Return Service. The information collected includes, but is not limited to, your name, date of birth and contact details. It can also include health, employment, pension, PPS Number and salary information. We restrict access to, and the use of, special categories of data and other sensitive personal information such as your tax return details.

The personal information needed to provide you with the Cornmarket Tax Return Service is held and used to:

- verify your identity and to verify the accuracy of the information we receive about you
- assess the information you have provided and file a tax return on your behalf where you have provided your authorisation to do so
- correspond with the Revenue Commissioners when reviewing your tax affairs to ensure accuracy of your tax return. We will only do so with your authorisation
- provide you with information about your membership of the Cornmarket Tax Return Service
- provide customer care and service – to administer your membership and make any changes during its term, answer queries, provide updates or process a cancellation
- contact you to inform you of any relevant actions you may need to take
- manage and investigate any complaints
- receive any payments in relation to your membership
- store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.

Required by law:

Below is how we use your personal information to comply with all relevant laws and regulations:

- Reporting to the Revenue Commissioners and other official government agencies
- Keeping proper books and records.

We carry out internal reporting, quality checking, compliance controls and audits to help meet our legal obligations.

When you give us your personal information we will check to see if we already have a record of you. This helps us to comply with your Data Protection rights. Please see Section 9 of this Data Privacy Notice for more details about your rights.

Cornmarket's legitimate interests:

We use your personal information for our legitimate interests as shown below. This doesn't affect your privacy rights. We believe these uses benefit our customers. You can contact us if you have any questions using the contact details in Section 10 of this Data Privacy Notice. You can object to this processing at any time.

- **Call Recording:**

- o For customer service purposes, we record and monitor calls. We let you know if a call is being recorded at the start of the call so you can decide whether to continue or not.

- **Statistical Analysis:**

- o We combine our data for analysis to help us understand our customers and develop better products and services. We use the anonymised information to help promote our products and services. We also use your personal data for reporting purposes to our parent company Cornmarket Group Financial Services Ltd. The information provided for this purpose is anonymised.

- **Market Research**

- o We carry out market research inclusive of customer surveys, to improve our processes, products or services or to investigate the possibility of new processes, products or services and to buy or sell any business or assets.

With your consent:

You need to give consent for us to collect and use personal information classed as sensitive or for certain uses of your personal information. You are given the choice to provide consent, or not. When we collect your consent, we will explain what we need it for and how you can change your mind in the future.

4. CONSENT AND HOW TO WITHDRAW CONSENT?

If we process your personal information based on consent, you have the right to withdraw that consent at any time as follows:

By writing to: Cornmarket Retail Trading Ltd, Christchurch Square, Dublin 8

By emailing: dataprotection@cornmarket.ie

By telephoning: (01) 408 4000

5. HOW AND WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?

You provide us with your personal information directly when you contact us, complete our forms, speak with us or visit our website, social media accounts, use the MyCornmarket app or through your dealings with Cornmarket Group Financial Services Ltd. For more information on what personal information is collected and used on the Cornmarket website please see the Website Privacy Statement which includes information regarding the use of Cookies and is available at www.cornmarket.ie/website-privacy-statement.

We also receive your information from Cornmarket Group Financial Services Ltd. which is our parent company as their staff members often during the provision of advice will recommend and facilitate your membership of the Cornmarket Tax Return Service. Some Salary Protection policies administered by Cornmarket Group Financial Services Ltd. have an added benefit of a complimentary tax return in the event of a claim. When a customer chooses to avail of this benefit, Cornmarket Group Financial Services Ltd. will pass your information to us for this purpose. In addition to this, customers who have signed up to union specific Rewards Programs provided by Cornmarket Group Financial Services Limited may avail of the Tax Return Service. In these instances Cornmarket Group Financial Services Ltd. will pass your personal information to us for this purpose.

From time to time we also receive personal information from the Revenue Commissioners (with your authorisation), solicitors, accountants or other third parties you may have nominated.

We also create new personal information about you based on information you have provided us and through your interactions with us such as noting your online preferences.

6. WHO DO WE PASS YOUR PERSONAL INFORMATION TO?

We pass personal information to:

- **Data Processors:**

- o We share your personal information with companies that act as service providers under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used by other parties for any other reason. Our main Data Processor is Cornmarket Group Financial Services Ltd. The categories of services that we use Data Processors for include: document management and disposal, to facilitate the completion of your tax return, customer services, complaint management, compliance advice, administration, marketing, I.T. services and making and receiving payments.

- **Your Authorised Representatives:**

- o We share your personal information with third parties you have nominated to deal with our company on your behalf.

- **Other Official Agencies:**

- o An Garda Síochána, the Revenue Commissioners, other official agencies or as needed to comply with regulations and laws and on foot of a Court Order or Subpoena.

7. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)?

Your personal information is processed and stored within the EEA. However, we do pass personal information securely to Canada in order to support the transfer of information from Cornmarket to our underwriters and business partners. When we do certain secure transfers these files temporarily reside on Canadian servers owned by Great West Life Co. Passing your personal information to certain countries, including Canada, is allowed under an adequacy decision made by the European Commission.

We also pass your information to an email service provider in the United States of America for the purposes of sending you emails regarding your membership and, with your consent, regarding other products which may be of interest to you. This Data Processor is a certified company under the EU-US Privacy Shield. This company only uses your personal information to provide you with emails relating to your policy or other products that we offer, on our behalf.

8. HOW LONG DO WE KEEP PERSONAL DATA FOR?

We keep and use your personal information for as long as you have a policy contract through Cornmarket. We also hold it after your relationship ends with Cornmarket for as long as regulations permit.

After the required period, we will de-personalise (anonymise) or delete the personal data. De-personalisation means that we will delete certain aspects of the information we hold which makes this identifiable (such as name and street address) so that we can no longer determine who it relates to. This results in the data no longer being considered personal data.

9. WHAT ARE YOUR RIGHTS?

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details in Section 10 of this Data Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month. This period may be extended for a further 2 months. If we need this extra time to deal with your request, we will notify you of the fact that there will be a delay and the reasons for it within a month of your request being made. Likewise, if we have reason to refuse your request, we will notify you within a month of the refusal and the reason for it.

- **Right to Information**

You have a right to the information set out in this Data Privacy Notice. We will inform you of our updated Data Privacy Notice, if we change the type of personal information we collect and / or how we use it.

We have controls in place to protect your personal information and minimise the risk of security breaches. However should any breaches result in a high risk for you, we will inform you without delay.

- **Right to Restrict or Object**

You can restrict or object to any unfair and unlawful collection or use of your personal information.

You can object to any automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person.

Where we state in this Data Privacy Notice that we process your personal data on the basis of a legitimate interest, you are entitled to object to the processing in question on grounds relating to your particular situation. We will then stop processing the personal data in question unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or unless we need to use it in relation to legal claims. Please note that if you object to us processing your data, we may not be able to provide certain services or benefits you would otherwise be entitled to under your membership.

You can withdraw consent and object to the processing of your personal data at any time.

• **Right to Correct and Update**

You can ask us to correct and update personal information we hold about you.

It is important we have your up to date personal information, such as contact details to provide you with the best service. Please ensure to advise us of any updates to your personal data.

• **Right to Delete and Be Forgotten**

You can have your personal information deleted if it is incorrect or has been processed unfairly or unlawfully.

However, we must keep your personal information for a minimum period by law.

If you have withdrawn consent you can ask for your personal information to be deleted unless we need to keep it under a legal requirement.

• **Right to Portability**

You can ask for a copy of all personal information that you gave us which is held by us in an automated format. This is only in relation to personal data that we process on the legal basis of consent or for the purpose of entering or performing a contract and where the processing is carried out by automated means.

You can receive this in a machine readable format.

You may also request Cornmarket to send this personal information in a machine readable format to another company.

The format will depend on our ability to provide this in a secure way that protects your personal information.

We will not likely be able to use a copy of your personal information sent to us in this way from another company. This is because we can only collect personal information that we need. We also need your most up to date personal information in order to provide you with the Cornmarket Tax Return Service.

• **Right to Access**

You have the right to know what personal information we hold about you and to receive a copy of your personal information.

We must tell you:

- o why we hold it,
- o who we pass it to, including whether we transfer it outside the EEA,
- o how long we keep it for,
- o where we got it from, and
- o if we carried out any automated decisions, and if so, the logic behind these and what it means for you.

This right does not allow you to access personal information about anyone else. To access your personal information please write to us using the contact details in Section 10 of this Data Privacy Notice. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information.

10. HOW TO CONTACT US

If you have any questions about your personal information and this Data Privacy Notice or if you wish to exercise any of your rights, please contact us at:

Cornmarket Retail Trading Ltd.

The Compliance Department
Christchurch Square
Dublin 8

Telephone: +353 (0)1 408 4000

Email: dataprotection@cornmarket.ie

11. COMPLAINTS

If you do not think that we have processed your personal information in line with this Data Privacy Notice, please contact us directly at:

Cornmarket Retail Trading Ltd.

The Compliance Department
Christchurch Square
Dublin 8

Telephone: +353 (0)1 408 4000

Email: dataprotection@cornmarket.ie

If you are not happy with how we have processed your personal information or handled your privacy rights, you can complain to the Data Protection Commission by contacting them using the details below:

Data Protection Commission,

Canal House,
Station Road,
Portarlinton,
Co. Laois, R32 AP23

Telephone: +353 (0)761 104800

LoCall: 1890 252231

Fax: +353 57 8684757

Email: info@dataprotection.ie

12. CHANGES TO OUR DATA PRIVACY NOTICE

We may update this Data Privacy Notice from time to time. Any changes will be published on this page www.cornmarket.ie/tax-return-service

This Data Privacy Notice is effective from 25th May 2018.

