Privacy Notice / GDPR

Complete Insurance Brokers Limited trading as Complete Insurances is committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights.

For the purposes of the GDPR the data controller is Complete Insurance Brokers Limited trading as Complete Insurances.
Our contact details are
Complete Insurance Brokers Limited
The Old Brewery, The Glen
Kinsale, Co. Cork
021 245 1234
GDPR@completeinsurances.ie

When we refer to we/us, we mean Complete Insurance Brokers Limited trading as Complete Insurances.

Please read this Privacy Notice carefully as this sets out the basis on which any personal data, we collect from you, or that you provide to us, will be processed by us.

Who are we?
Complete Insurance Brokers Limited trading as Complete Insurances C582804 is regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations 2018.

Our GDPR Owner can be contacted directly here:

- Name: Michael Cronin
- Email address: ìnfo@completeinsurances.ie
- Phone number: 086 150 4705

How do we collect your information and what information do we collect?
The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data.

Our organisation collects personal data in the following ways, if you:

- request a service from us*; e.g. requesting term life insurance coverage.*
- register with or use any of our websites or online applications*; e.g. when requesting a quote via company website: www.completeinsurances.ie*
- use our website/apps and it installs cookies or other tracking technologies onto your device.
- engage with us on social media; *Including LinkedIn, Twitter, Facebook, Instagram etc.*
- contact us with a complaint or query;

- apply for a position with us;
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What information do we collect?
The information we collect about you may include the following:

Contact and identifying information, including name, address, contact details, email address, mobile number and landline number, unique identifiers, including PPS number, pension scheme reference numbers and insurance policy numbers, demographic details, including age, gender, marital status, lifestyle, insurance requirements, date of birth, dependants and photographic identification, family and beneficiary data, including details of dependants, next of kin, nominated beneficiaries, Power of Attorney, Enduring Power of Attorney, solicitor, tax adviser and accountant, employment information, including occupation or role, employment status, salary information, employment benefits and employment history, health information, including health status, medical history, medical records, medical assessment outcomes, smoking habits, alcohol consumption, disability information and, where relevant, biometric information, pension and insurance benefits information, including existing benefits, pension entitlements, expected retirement date, voluntary contributions, Pension Adjustment Orders and other relevant matters affecting pension or insurance benefits, financial details, including bank account details, income, salary, tax information, deductions, bonus payments, benefits, entitlements and relevant contribution information, claims data, including information relating to insurance claims obtained from you and, where relevant and permitted, from third parties, marketing preferences, including information relating to whether you have consented to receive direct marketing communications from us, online information, including information relating to your visits to and interaction with our website, social media information, including likes, comments, messages, posts and other interactions with our social media presence, including LinkedIn, X/Twitter, Facebook and Instagram, and criminal records information, including information concerning criminal convictions, offences or alleged offences where relevant to an insurance application or underwriting process.

When our organisation collects sensitive personal data as defined within the GDPR we will ensure that we require this information, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

Information we automatically collect.
We sometimes automatically collect certain types of information when you visit our websites and through e-mails when we communicate with you. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Other cookies such as functional cookies, marketing cookies and analytical cookies will only be used with your expressed consent. Further information about our use of cookies can be found in our Cookie Notice at the footer of our web page. *www.completeinsurances.ie*

How do we use your personal data?
Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for insurance, investment, protection, pension products, independent financial advice, quotes.

1.	**Performing services for our clients and prospective clients** – when you require insurance/investment products, we use your data to enable us to provide the required product
2.	**Statutory and other regulatory requirements** – we are required to carry out various obligations which include: • AML/Sanction checking • Knowing your customer "Fact Find" • Adherence to the Consumer Protection Code • *Make suitable recommendations*
3.	**Communicate and marketing to you –** *Please refer to marketing and advertising policy for additional information.*
4.	**Process claims –** *please refer to claims processing policy.*
5.	**To contact you if required or to respond to any communications that you might send to us.**
7.	**Carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.**
10	**Handling complaints** *Please refer to complaints handling procedure.*
11	**To notify you about changes to our service**

Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data.

Performance of a contract	When we enter a contract with you, we will collect and use your personal data to enable us to fulfil that service.
Legal obligation	The use of some of your personal data is necessary for us to meet our legal obligations e.g., pension contributions for Revenue Certificates, Regulatory purposes to the Central Bank.
Consent	Sometimes we may rely on consent as a legal basis for processing your information. For example, we rely on consent to collect and use personal data for any criminal convictions or alleged offences. This is used when we need to assess risk relating to an insurance policy for you. We share this information with other third parties

	where it is necessary to manage these services provided to you – these services include insurance underwriters, reinsurer and other insurance providers. We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time. Sometimes if you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services provided with immediate effect.
Legitimate interests	Where we rely on this legal basis to collect and use your personal information, we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.

If you require further information on any of the above basis for processing your data, we can provide you with further details.

How we share your data

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements.

1.	**Insurance Partners** where we need to manage the services provided to you such as Product Providers and insurance underwriters, reinsurers, and loss adjuster. You can refer to their privacy statements on their website for more information about their privacy practices.
2.	**Vetting and risk management agencies** such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the services.
3.	**Legal advisers, loss adjusters, and claims investigators**, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature.
4.	**Medical professionals**, e.g., where you provide health information in connection with a claim against your insurance policy; or when we are providing a quote for insurance.
5.	**EU Law enforcement bodies,** when required to do so by law and/or regulation, or another legal request.
6.	**Public authorities, regulators and government bodies,** where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity.
7.	**Third-party processors:** We outsource our processing operations to suppliers that process personal information on our behalf. Examples include IT service providers who manage our

	IT and back-office systems and telecommunications networks, and accounting and payroll providers, CRM providers, including BIS, Liam Darmody Accounting, Eircom. These processing operations remain under our control, and we have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.

Security
The security of your personal data is important to us, we have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk. We have processes in place to protect your personal data from loss, unauthorised access, misuse, alteration and destruction.

Retention
Complete Insurance Brokers Limited trading as Complete Insurances shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

Complete Insurance Brokers Limited trading as Complete Insurances may store data for longer periods if the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the implementation of appropriate technical and organisational measures to safeguard the rights and freedoms of the data subject.

The retention period for each category of personal data will be set out in our Retention Schedule along with the criteria used to determine this period, including any statutory obligations we have. Should you require further information we would be happy to provide.

Personal data will be disposed of securely.

For insurance brokers only; liability insurance
If you hold insurance against a liability that may be incurred by you against a third party, where for whatever reason you cannot be found or you become insolvent, or the court finds it just and equitable to so order, then your rights under the contract will be transferred to and vest in the third party even though they are not a party to the contract of insurance. The third party has a right to recover from the insurer the amount of any loss suffered by them. Where the third party reasonably believes that you as policyholder have incurred a liability the third party will be entitled to seek and obtain information from the insurer or from any other person, who is able to provide it including Complete Insurance Brokers Limited concerning:

- the existence of the insurance contract,
- who the insurer is,
- the terms of the contract, and
- whether the insurer has informed the insured person that the insurer intends to refuse liability under the contract.

Data Subjects Rights:
Complete Insurance Brokers Limited trading as Complete Insurances will facilitate your rights in line with our data protection policy and the Subject Access Request procedure. This is available on request.

Your rights as a data subject
At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records. (The erasure of such data will be dependent on our other legal obligations, and whether the data is subject of legal privilege).
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling.**
- **Right to make a complaint:** if we refuse your request under rights of access, we will provide you with a reason as to why.

All the above requests will be forwarded on, should there be a third party involved, as we have indicated in the processing of your personal data.

Complaints
If you wish to make a complaint about how your personal data is being processed by Complete Insurance Brokers Limited or how your complaint has been handled, you have the right to lodge a complaint with our GDPR Owner

You may also lodge a complaint with the Data Protection Commission (DPC) in Ireland, whose details are:

Data Protection Commission
21 Fitzwilliam Square South,
Dublin 2.
D02RD28
Web: www.dataprotection.ie
Email: info@dataprotection.ie

See website for updated contact details to reach the appropriate section within the DPC.

Failure to provide further information.
If we are collecting your data for a contract and you cannot provide this data, the consequences of this could mean the contract cannot be completed or details are incorrect.
When you fail to provide us with information we require to fulfil our obligations to you, we may be unable to offer our services to you.

Profiling – automatic decision making.
An automated decision is when we input your personal data into a computer programme and this programme analyses your personal data to provide us with a result. There is no human involvement in the decision making. An example of this would be during the insurance underwriting process. Some insurers will have automatic systems in place that will decide on non-complex insurance requests. If a decision is taken by automated means, you have the right to object to this and ask us to reconsider the service you have asked us to provide. Various insurers will also provide a quotation tool that will generate indicative insurance premiums based on an automatic decision-making process.

Special Categories of personal data
Special categories of data are sensitive in relation to your fundamental rights and freedoms and therefore require specific protection when processed as these could create significant risks to the rights and freedoms of individuals.

If we collect any special categories of personal data, such as health data, we will either obtain your explicit consent or we will adhere to the Data Protection Act 2018. This Act allows us to process special categories of personal data for insurance and pension purposes. We will ensure we have suitable and specific measures in place to safeguard the rights and freedoms of you and the processing of your data. These measures relate to the below:

- a policy of insurance or life assurance,
- an occupational pension, a retirement annuity contract or any other pension arrangement

Contact Us
Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on 021 245 1234 or info@completeinsurances.ie

Privacy notice/ statement changes
When we update this Privacy Notice/Statement, we will post a revised version online. Changes will be effective from the point at which they are posted. We would encourage you to review our Privacy Notice so that you are aware of updates.

This privacy policy was last reviewed on 22 July 2026

Data Protection Retention Policy

Scope

All Complete Insurance Brokers Limited records, whether analogue or digital, are subject to the retention requirements of this procedure.

Policy Statement

Complete Insurance Brokers Limited trading as Complete Insurances is committed to protecting and respecting personal data. We wish to be transparent on how we process personal data and demonstrate that we are accountable with the GDPR in relation to not only processing personal data but ensuring that such data is retained for no longer than is necessary i.e., for as long as required under legal or regulatory requirements, or for as long as required for legitimate business purposes. We will erase, delete or otherwise dispose of personal data in accordance with our Retention Schedule. It should be noted that there are regulatory obligations to hold information that we gather from our clients (which includes personal data), for set minimum periods. We will retain that information for as long as is required to comply with these obligations. For example:

• CBI/CPC requirements (retain data for at least 6 years from date of last transaction).

• FSPO requirements on long term investment products or mortgages (6 plus 3 years); and

• Restrictions on retaining data on spent convictions (the “7-year rule”);

Responsibilities

The following roles are responsible for retention of these records because they are the information owners. Information owners are responsible for ensuring that all personal data is collected, retained and destroyed in line with the requirements of the GDPR:

• Michael Cronin - GDPR owner is responsible for retention of financial (accounting, tax) and related records;

• Michael Cronin - GDPR owner is responsible for retention of all HR records;

• Michael Cronin - GDPR owner is responsible for retention of all Health and Safety records;

• Michael Cronin - GDPR owner is responsible for retention of all other statutory and regulatory records;

• Michael Cronin - GDPR owner is responsible for storage of data in line with this procedure; and

• Michael Cronin - GDPR owner is responsible for ensuring that retained records are included in business continuity and disaster recovery plans.

Procedure

Where required, we will retain certain records because they contain information that:

• have enduring business value (for example, they provide a record of a business transaction, evidence our rights or obligations, protect our legal interests or ensure operational continuity; and/or

• must be retained to satisfy legal, accounting, or other regulatory requirements.

We must balance these requirements with our statutory obligation to only keep records for the period required and to comply with data minimisation principles. Our Retention Schedule sets out the relevant periods for the retention of our documents.

In this Retention Schedule our organisation establishes retention or destruction schedules or procedures for specific categories of records.

Our organisation avoids retaining a record if there is no business reason for doing so and consults with either our GDPR Owner or our representative body for further guidance.

• We will hold personal data for no longer than is necessary. Refer Policy Statement above, and our Retention of Records Schedule, which sets out the relevant periods for the retention of our documents.

• Data will never be kept on a “just in case” basis.

• We have documented Retention Schedules setting out the retention periods and their rationale.

• Retention Schedules will be reviewed periodically (best practice: annually) to ensure their completeness.

• Personal data will be purged/deleted in line with our Retention Schedule and clear responsibility for doing so assigned within the firm.

• We will ensure that all paper files, including those kept in archive or off-site storage, are destroyed securely.

• While we keep our client records on our office premises we are aware that should the volume of documentation exceed our storage capacity that we can store the client records off site. However, they must be complete and readily accessible at all times.

• Every effort is made within our firm to protect our client data, for disaster recovery please see our Disaster Recovery Plan.

Contacts

Michael Cronin – GDPR owner
021 245 1234
Info@completeinsurances.ie