



## **Privacy Policy**

In accordance with the General Data Protection Regulation and related UK data protection legislation, we are committed to protecting the confidentiality and security of the information that you provide to us.

This Privacy Policy explains what information Tony McDonagh & Co Ltd (data controller registration number Z7277724) will collect about you and how we use it. In this Privacy Policy 'we', 'us' and 'our' refers to Tony McDonagh & Co Ltd, Avoca House, The Pavilion Business Centre, 6 Kinetic Crescent, Enfield, Middlesex, EN3 7FJ

If you have purchased an insurance policy that is underwritten by an insurer please refer to the Privacy/Data Protection Section in your Policy Wording, statement of fact or their website.

### **Using our Website Links**

Our website may contain links to other websites that may be of interest to you. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and read the privacy policies applicable to the website in question.

### **Consent**

By using our services, our website or providing us with your personal information you consent to its collection and processing as outlined in this Privacy Policy. By submitting any information about others to us (in which case you will obtain express consent from those individuals affected and will inform them of how their information is being used), they also consent to its use as set out in this Privacy Policy. If you do not consent, please do not use our services, website or provide us with your personal information by any other means.

### **How do we manage your personal information?**

The privacy and security of your personal information is important to us so please be assured that we will take all appropriate reasonable technical, legal and organisational measures which are consistent with applicable privacy and data security laws to safeguard your personal information whilst it is in our hands. However, unfortunately no data transmission over the internet or data storage system can be guaranteed to be 100% secure.

Please take the time to read this Privacy Policy carefully as it explains how we and/or our carefully selected third parties collect and use your personal information. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any personal information you have with us has been compromised) or you would like further information about our use of your personal information or wish to complain about how it is being used, please contact:

Sean McDonagh – Managing Director  
Tony McDonagh & Co Ltd  
Avoca House  
The Pavilion Business Centre  
6 Kinetic Crescent  
Enfield  
Middlesex  
EN3 7FJ

Or email: [insurance@mcdonaghs.co.uk](mailto:insurance@mcdonaghs.co.uk)

If we are not able to resolve your concerns about our handling of personal information, you have the right to complain to the Information Commissioners Officer. [Click here](#) to be directed to their website for more information.

### **Data Accuracy**

We take all reasonable steps to ensure that your personal information remains accurate and complete as is necessary for the performance of our services to you and in line with the controls detailed in this Privacy Policy. If you have reason to believe that the personal information being held by us is inaccurate please contact us at [insurance@mcdonaghs.co.uk](mailto:insurance@mcdonaghs.co.uk).

### **What information do we collect and where do we get it from?**

In order for us to provide our services to you and manage those services we will ask you to share your personal information with us. The circumstances in which we use your information, the reasons why we ask for it and details of how we will use this information is detailed below.

The information we collect about you varies depending on your particular circumstances and requirements and may include for example:

#### **1. General information and contact details**

Your name, address, e-mail and telephone details, gender, marital status, relationship to the policyholder or prospective policyholder, information about what you would like to insure; location of the property insured or to be insured, claims history, expiring insurance details, rebuilding or replacement value of the property to be insured;

#### **2. Financial information and account details**

Bank account number and account details, credit history and credit score, financial information about your business (e.g. annual turnover);

#### **3. Medical Condition and health status**

In certain cases we may receive information about your current or former mental or medical condition, health status, injury or disability information;

#### **4. Other sensitive information**

In certain circumstances we may obtain information about your criminal record or civil litigation history in the process of providing a quotation or in the process of preventing, detecting and investigating fraud;

#### **5. Telephone Records**

Recordings of telephone calls to and from our employees.

#### **6. Website**

Information about the use of our website such as your IP address, which is a unique number identifying your computer. For further detail please see our [Cookies Policy](#).

We may also collect personal information from the following sources:

- a. you or someone connected to you as part of a quotation, policy adjustment or claim;
- b. publically available sources of information such as social media and networking sites;
- c. third party databases made available to the insurance industry as well as databases where you have given your permission to share information with a third party like us;

If you have provided information to us about someone else, you would have confirmed that you have the consent of these individuals to share their personal information with us. **You should share** this privacy policy with all individuals whose personal information you have shared with us as it may also apply to them.

### **How We Use Personal Data**

We and/or our carefully selected third parties may collect and use your personal information under the following circumstances or for the following reasons:

- 1) to provide you with services relating to an insurance quotation and/or insurance policy such as:
  - a. assessing your insurance application and arranging your insurance policy;
  - b. providing you with the services described in your policy documents;
  - c. managing your insurance policy including claims management and issuing policy documentation to you.

The collection and use of information such as your name, address, e-mail and telephone details, gender, marital status, relationship to the policyholder or prospective policyholder, information about what you would like to insure; location of the property insured or to be insured, claims history, expiring insurance details, rebuilding or replacement value of the property/item to be insured, credit history and conviction details are necessary to enable us to provide you with a quotation and/or policy. Without this information we will be unable to assess your application and/or provide claims services.

- 2) to communicate with you and other interested parties to manage your claim and where applicable manage claims disputes;
- 3) to send you important information regarding your policy, claim/s and other administrative information;
- 4) to provide improved quality, training and security (for example with respect to recorded or monitored telephone calls);
- 5) to carry out market research and analysis including satisfaction surveys;
- 6) to resolve complaints and handle requests for data access, correction or erasure;
- 7) to establish and defend our legal rights, protect our business operations (including our group companies), our rights, privacy, safety of employees and property and pursue available remedies to limit our liabilities;
- 8) Where we have justifiable reason, such as:

- a) keeping records about you and our correspondence with you as well as your current and past insurance policies and history of insurance claims. This is so that we can manage our relationship with you appropriately and effectively as well as satisfy any legal and regulatory obligations we may have.
  - b) preventing and detecting fraud, financial crime and money-laundering. We may use your personal information to prevent fraud and in doing so may:
    - collect personal information about you from databases as described in this policy and from publically available sources, such as social media and networking sites;
    - check your personal information against databases;
    - share your personal information with fraud prevention agencies;
    - share your personal information with operators or registers available to the insurance industry to check information you provide. These include the Claims and Underwriting Exchange Register and Theft Register. We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents and suppliers.
  - c) Carrying our processes such as statistical and trend research and analysis which may include computerised processes that profile you. This is to better understand, predict and forecast our customer's or prospective customer's preferences and to improve the products and services we offer.
- 9) You have given us permission to use your sensitive personal information or that of a child (i.e. in respect of travel insurance) in order to provide you with a quotation and/or the services set out in your policy documents. For example making reasonable adjustments as a result of a disability you have told us about. Where you have provided sensitive personal information about someone connected to you would have confirmed that you have their permission to share this information with us;
- 10) We will contact you in order to communicate our products and/or services which we believe may be of interest to you and which relate to your general insurance needs.

There may be times when we will require your permission to provide information about products and services to you, such as:

- a) Where the product or service is not similar to those that we currently provide to you but we believe you may be interested in it; or
- b) When you have opted out of us sending details of or contacting you in relation to the products and services we offer.

We may communicate with you by post, email, telephone and/or digital methods such as social media and online advertising unless you have told us you do not want us to. Where you no longer hold a policy with us or we have provided you with a quote in the past we will keep you informed about our products and services for a period of up to 3 years.

- 11) We may use cookies on some pages of our website. A cookie is a small text file sent to your computer. This allows us to monitor and improve our website. Useful information about cookies, including how to remove them can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org). Please also refer to our [Cookie Policy](#).

Internet browsers normally accept cookies by default, although it is possible to set a browser to reject cookies. We will ask your permission before using any cookie that is not essential to the use of the website. However refusing to accept cookies may restrict your use of our website and/or delay or affect the way in which our website operates.

The open nature of the internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data was intended. Whilst this is outside of our control, we do take the protection of your information very seriously and aim to apply appropriate level of security at all times.

### **Who might we share your information with?**

We may share your personal information with:

- a) our group companies;
- b) other insurance and distribution parties, business partners, agents or carefully selected parties providing a service on our behalf. For example providing IT systems and administrative services or claims handling services.
- c) organisations that have a specific role laid out in law such as statutory bodies, regulatory authorities and other authorised bodies;
- d) other organisations where we have a duty to or are permitted to disclose your personal information by law. For example if we received a valid request from the Police or other third party organisation in the interest of preventing and detecting crime;
- e) fraud prevention agencies and operators of registers available to the insurance industry to check information and prevent fraud;
- f) credit reference agencies to check your credit history. This check will be recorded on your credit reference file;
- g) third parties we use to recover money you may owe us or to whom we may sell your debt;
- h) another company when we are trialling their products and services which we consider may improve our services to you or our business processes;
- i) other third parties if you have given us permission to do so or there is sufficient reason to believe they are acting on your behalf.

### **How long we will retain your information?**

We will keep your information for as long as is reasonably necessary for the purposes set out in this privacy policy and to fulfil our legal and regulatory obligations.

### **Use and storage of your information overseas?**

The personal information we and our carefully selected third parties collect from you may be transferred to, stored and processed outside the European Economic Area (EEA). We or our service providers may use cloud based computer systems (i.e. network of remote servers hosted on the internet which process and store your information) to which foreign law enforcement agencies may have the power to require access. We will not transfer your information outside the EEA unless it was to a country our information regulator has assessed as having adequate data protection laws or we have taken all reasonable steps to ensure the firm has the necessary privacy and security controls in place to protect your information as if it were in the EEA.

### **How we will deal with others acting on your behalf?**

To help manage your insurance policy we will deal with individuals you nominate, including third parties we reasonably believe to be acting on your behalf provided they are able to answer our security questions. However, for your protection we will need to speak to you

directly, your legal representative, someone you have nominated and given us permission to discuss your personal details with or your Power of Attorney, should you require changes to your contact address or policy coverage, if you wish to make a claim or to cancel the policy.

### **Your rights**

You have a number of rights concerning the personal information we use, these include the right to:

- ask for access to and a copy of your personal information;
- ask us to correct or delete the personal information;
- ask us to restrict or object to the use of your personal information at any time;
- where you have previously given us your permission to use your personal information, withdraw that permission. Where your permission is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you do not wish us to contact you again;
- complain to the Information Commissioner's Office at any time if you object to the way we use your personal information. For more information please go to [www.ico.org.uk](http://www.ico.org.uk).
- object to an automated decision including profiling.

To discuss your rights or make a request, please contact:

Sean McDonagh – Managing Director  
Tony McDonagh & Co Ltd  
Avoca House  
The Pavilion Business Centre  
6 Kinetic Crescent  
Enfield  
Middlesex  
EN3 7FJ

Or email: [insurance@mcdonaghs.co.uk](mailto:insurance@mcdonaghs.co.uk)

Please note that in some cases even when you make a request concerning your personal information, we may not be required, or may not be able to honour it as this may result in us not being able to fulfil our legal and regulatory obligations or there is a minimum statutory period of time for which we have to keep your information. If this is the case then we will let you know our reasons.

### **Changes to this Privacy Policy**

We review this Privacy Policy regularly and reserve the right to make changes at any time to take account of changes in our business and legal requirements. We will place updates on our website [www.tmdinsurance.co.uk](http://www.tmdinsurance.co.uk).

This version of the privacy policy was last updated 24 January 2023