

## **Partner Privacy Policy (Keycare Assistance)**

### **Privacy Policy:**

#### **How we handle your data**

#### **What personal data does Keycare hold about me?**

Key Assistance Limited (“Keycare”) has received your personal data in relation to your Keycare insurance policy or your Recovery and Assistance cover (“the Policy”). It receives it directly from the firm which sold you the Policy (“your Policy Seller”) or from you when you contact Keycare in relation to the Policy. The personal data consists of the following (or some of it): full name and title, full address, date of birth, contact telephone numbers, email address, make and model of vehicle and vehicle registration number, and (in limited circumstances) bank and credit card details. (It includes data supplied by you or your Policy Seller about any other person named on the Policy and you should make this Privacy Policy available to them.)

#### **What does Keycare do with my personal data?**

Keycare is a Data Controller in relation to the data that it processes about you. Your Policy Seller is also a Data Controller in relation to any data that it processes about you and it will process data in accordance with its own Privacy Policy which will be issued separately by it.

Keycare will use your personal data for any one or more of the following purposes:

- To administer the Policy;
- To communicate with you for any purpose in relation to the Policy (including renewal options) by letter, telephone, fax, email or text message;
- To communicate with your Policy Seller for any purpose in relation to the Policy by letter, telephone, fax or email.

#### **What is Keycare’s legal basis for holding my personal data?**

The legal basis of processing is:

- That the processing is necessary for the performance of the contract of insurance, namely the Policy (including sending your documents to you, dealing with any claim and administration of the Policy);
- That the processing is necessary for the purposes of the legitimate interests pursued by Keycare (including sending you a renewal notice or for any other matters arising from the Policy not covered in the bullet point above).

Additionally, on the basis of your explicit consent, Keycare may process special category data (such as information relating to your health) where this is provided to Keycare to enable you to be given any extra assistance which you may require in relation to the Policy.

#### **Will Keycare transfer my personal data to third parties?**

Keycare may transfer your personal data (including any special category data) to the Insurer which underwrites the Keycare and Keycare Plus Policies (Mapfre Asistencia Compania Internacional de Seguros Y Reaseguros S.A trading as Mapfre Assistance Agency Ireland) and communicate with the Insurer in relation to the Policy by letter, telephone, fax or email. The Insurer may use your personal data for all purposes relating to the Policy and its underwriting and may communicate with you in relation to the Policy by letter, telephone, fax or email. For more details of how the Insurer collects, uses and shares your personal data please refer to the Policy.

Keycare will transfer your personal data to third parties where this is necessary to administer the Policy. Such third parties include Key Care Limited, the parent company of Keycare, locksmiths and key providers providing services under the Policy who may in turn from time to time use third parties to perform such services. They may use your personal data to provide services to you under the Policy and may communicate with you by letter, telephone, fax, email or text message in relation to the Policy.

Keycare may transfer your personal data to third parties where this is necessary or desirable for the legitimate business interests of Keycare or as required by law.

### **Will Keycare transfer my personal data outside the Republic of Ireland?**

Keycare will only transfer your data to third parties within the European Economic Area or (subject to any relevant legal safeguards) the United Kingdom.

### **How long will Keycare hold my personal data?**

Keycare will update your personal data from time to time based on information received from your Policy Seller or from you directly. In order to comply with tax, financial services regulations and other applicable legislation, Keycare will hold your personal data for the duration of the Policy and for six years after it ends, at which time it will be destroyed.

### **Will Keycare use my personal data for marketing?**

Keycare will not use your personal data for marketing purposes (other than, in limited circumstances, to contact you prior to the expiry of the Policy in connection with its renewal or upgrade, as the renewal will normally be handled by your Policy Seller).

### **Updates to this Privacy Policy**

From time to time Keycare may make changes to its Privacy Policy to take account of changes in legislation and practice. The latest version will be available at <http://key.care/mapfreprivacy.policy>.

### **What are my rights under Data Protection Legislation?**

You have the right to request from Keycare access to and rectification or erasure of personal data or restriction of processing concerning you and to object to processing. In addition, you have the right to data portability. Any questions you may have about data protection should be addressed to the Group Compliance Manager at Keycare at the address below.

You have the right to lodge a complaint with the Data Protection Commission ([www.dataprotection.ie](http://www.dataprotection.ie)).

### **How do I object to Processing of my Personal Data by Keycare?**

Keycare may process your personal data for the purposes of its legitimate interests, including contacting you prior to the expiry of the Policy in connection with its renewal.

You have the right to object to processing by Keycare for the purposes of Keycare's legitimate interests.

If you wish to exercise this right, please contact the Data Protection Officer at the address below.

**Keycare Assistance Limited, 77 Camden Street Lower, St Kevins, Dublin 2. Telephone:** 01 506 0365 **Email:** [DPA@keycare-assistance.ie](mailto:DPA@keycare-assistance.ie)

Keycare Assistance Limited is authorised and regulated by the Central Bank of Ireland: registration number C434286

Registered in the Republic of Ireland under company number 657005

Registered office: 77 Camden Street Lower, St Kevins, Dublin 2

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