



## **Legal & Privacy Notice**

At Excella, we respect an individual's right to privacy and will do everything we can to comply with current data protection legislation. This notice applies to both our day to day business activities as well as to this website. It is intended to outline how we capture, handle and store personal data as well as our purpose for doing so. We would encourage you to read this policy carefully and contact us with any questions or concerns about our privacy practices.

### **Who we are?**

Excella DAC is registered in Ireland at 2A Forest Crescent, Rathingle, Swords, Co Dublin. We are registered with the Irish Data Protection Commission as a Data Processor. We collect and process data on behalf of the insurance company that we have been engaged by and act in their interests. The insurance company for whom we act is the Data Controller.

### **What information do we collect?**

Full Name  
Email address  
Home address  
Telephone numbers  
Date of Birth  
Gender  
Location information  
What you are doing when / status  
Events attended  
Status  
Job position / title  
Photographs  
History / background  
Place of birth  
Insurance details  
Medical information  
Criminal record

CCTV footage  
Video footage  
Bank Account Details  
Call recordings

Much of this information is provided to us by the Data Controller however, other information is requested directly from the policyholder either in writing or directly at an interview.

From time to time, we may need to engage the services of a third party administrators. These third parties are engaged to assist with claims in determining the cause of a loss or damage sustained by a policyholder and would provide us with a report on that. Additionally we may engage third party administrators for risk management purposes.

The types of personal data that can be received from these third party administrators include:  
CCTV footage  
Video footage  
Photographs  
Site Surveys  
Risk Management & Underwriting reports

## **How do we use personal information?**

Excella are Managing General Agents who are engaged by insurance companies to manage accounts on their behalf. It is for this purpose that we collect and process personal data. This management of underwriting & claims involves the collection and processing of data for:

Underwriting of Risks  
Validation of claims  
The detection and prevention of fraud  
Reporting to the policyholder's Insurance Company (Data Controller)

In addition to this, we will also use anonymised historical claims data for the purposes of providing market trend and management information reports. The term "anonymised" means that we have irreversibly removed all personal data from a record so that the data cannot be used to identify the people that it relates to either by itself, if processed further, or if paired with other information that could be in the public domain.

## **What legal basis do we have for processing your personal data?**

When a policyholder takes out an insurance policy, they are entering into a contract with that insurer to provide cover under agreed contract terms and conditions. Part of our investigation, is to ensure that these terms and conditions have been adhered to and it is for this "contractual obligation", that we collect and process personal data.

## **When do we share personal data?**

In the event that a third party is engaged, a policyholder is always advised of the third party's details in advance and certain information will be passed to the third party to enable them contact a policyholder and to carry out the investigations that have been requested.

**This information may include:**

Full Name  
Email address  
Home address  
Telephone numbers  
Location information  
Synopsis of Claim  
Photographs  
History / background relevant to the claim under investigation

Excella have a Data Protection agreement in place with all third parties who we engage to assist with the investigation of a claim.

Information is typically transferred between Excella and these third parties via secure email, although larger documentation can be physically sent via recorded post.

**Where do we store and process personal data?**

All personal data that is provided to or collected by us, is stored in our IT system which is only stored on Excella servers and computers.

Excella undertake to ensure that data is at all times stored and processed within both the terms and spirit of the General Data Protection Regulations and that it will remain within the European Economic Area.

**How do we secure personal data?**

All office locations are protected by firewalls and incoming access is restricted to secure Lotus Notes or VPN access only. Our public website is externally hosted, therefore, HTTP access is denied at all office locations.

Our email is routed through an external host where antivirus and malware scanning is carried out. All outgoing email is transferred via forced Transport Layer Security (TLS).

All computers, laptops and mobile devices are encrypted and we do not allow the use of portable data devices such as USB drives for the storage or transfer of company data.

We also have a contract with an external IT security company who carry out regular unscheduled penetration tests to ensure the security of our networks.

Access to Excella offices are security controlled. Any visitors to the premises are required to sign in and display a visitor pass which they hand back when leaving the building.

Excella operate a strict “clear desk” policy with all information concerning customers placed in locked filing cabinets overnight.

All discarded paper is placed into a locked shredding box for secure shredding.

When physical files are taken from our offices, they are placed in a locked file security box.

The physical files of archived underwriting, claims and other files are stored in a secure file storage facility in Galway.

### **How long do we keep your personal data for?**

Excella will retain all data for a period of six years. Data is deleted twice yearly with data that has passed the six year anniversary in the previous six months being deleted in June and December each year.

All paper records are destroyed at this time. Anonymised records are retained in our IT system with all other electronic records being deleted.

Call recordings are retained for a period of two years after the date of the call. However, if a copy of a call recording is retrieved for any reason, it is copied into our IT system and then retained along with all other electronic data for the six year period.

### **Your rights in relation to personal data**

We would ask you to note that as Excella is a data processor, all requests for access or removal of personal data will be immediately passed onto the relevant Data Controller for processing.

### **Data Protection Officer**

Our Data Protection Officer is Patrick Carr. He may be contacted via email at [patrick@excellamga.ie](mailto:patrick@excellamga.ie) or via telephone on 086-7880208. Alternatively, if you wish to contact him in writing, your letter can be sent to: Excella MGA, 2A Forest Crescent, Rathingle, Swords, Co Dublin.

### **Use of Cookies**

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