

# **Chill**

## **INSURANCE**

**WE'LL TAKE IT FROM HERE**

### **Chill Money Privacy Policy**

General Data Protection Regulation (EU) 2016/679

# Chill Money Privacy Policy

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## Ensuring your privacy is protected

Chill Insurance Limited (t/a “Chill Money”) respects your right to privacy and complies with our obligations under relevant data protection legislation including the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

In arranging personal loans and credit cards, Chill Money acts as a sales agent exclusively on behalf of AvantCard DAC. AvantCard DAC may provide credit services or facilities, including certain credit card products, personal loan products and ancillary protection services. For the purpose of providing these services, the data controller is AvantCard DAC and Chill Money acts as a data processor on behalf of AvantCard DAC in respect of these activities.

AvantCard DAC will use the personal information you provide through the Chill Money website or over the phone to process applications for Chill Money credit cards and personal loans. Where AvantCard DAC processes your personal data and where Chill money is acting as a processor on their behalf, the provisions of AvantCard DAC’s privacy policy shall apply. Click [here](#) for a copy of the Privacy Policy and Cookies Statement of AvantCard.

### 1. Chill Money

We, our, us, Chill refers to Chill Insurance Limited trading as Chill Money. Chill Money is registered as an authorised credit intermediary. In addition to acting as a processor on behalf of AvantCard DAC as outlined above, Chill Money also acts as a controller of your data for certain processes (outlined in section 4). Unless otherwise stated the controller for the purposes outlined in the remainder of this privacy policy is Chill Money. We can be contacted by post at Chill Money, Ravenscourt Business Park, Sandyford, Dublin 18, D18 K267 Ireland by telephone at +353 1 556 5500. Our data protection officer (“DPO”) can provide you with additional information on this Policy and your rights as outlined in Section 9. Their contact details are below:

**Data Protection Officer**  
**Chill Money**  
**Ravenscourt Business Park**  
**Sandyford**  
**Dublin 18**  
**D18 K267**  
Email: [dpo@chill.ie](mailto:dpo@chill.ie)



## 2. Information Collection

We collect information from you when you access our chillmoney.ie website and when you contact our office and speak to members of our staff.

We will only collect information that is adequate, relevant and limited to what is necessary in relation to the purposes identified within this Policy.

The table below outlines the categories and types of data we collect along with the source of the data. Data collected for the purposes of providing loan or credit services are outlined in the AvantCard DAC's privacy policy.

| Data Category              | Data Type                                  | Where we collect the data from   |
|----------------------------|--|--|
| Identity & Individual Data | Name, address, email address, phone number | <ul style="list-style-type: none"> <li>You;</li> <li>Any representative nominated by you to act your on behalf such as a family member or legal representative;</li> </ul> |

## 3. Purposes for which we hold your Information

The main purposes for which Chill uses your personal information are to carry out marketing activities and analytics. Where we carry out analytics on the data we will always anonymise the data where possible. The following section provides more detail on the purposes for which we process your personal data and the legal basis by which we do this.

| Purpose/Activity  | Legal basis for processing   |
|---|--|
| To provide you with marketing communications about other services/products or offers we feel may interest you.  | Consent  |
| To ensure that content is presented in the most effective manner for you and for your computer or device.   | Necessary for our legitimate interests (to keep our Site and the Services updated and relevant and to develop and grow our business).          |
| To administer and protect our business, our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. | Necessary for our legitimate interests (for running our business and as part of our efforts to keep our Site and the Services safe and secure) |



|  |   |
|--|---|
|  |   |
| <p>To use data analytics to improve or optimise our Site, marketing, customer relationships and experiences.</p> | <p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Site and the Services updated and relevant, to develop and grow our business and inform our marketing strategy).</p> |

### 3.1 Change of Use

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our data protection officer at the contact details listed in Section 1 of this Policy. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with this Policy, where this is required or permitted by law.

## 4. Recipients of Data

We may share your personal data with outside organisations, below is a list of the categories of recipients of organisations we share your personal data with:

#### Your representatives:

Any party you have given us permission to speak to (such as a relative, friend or legal advisor) and other people or companies associated with you

#### Our representatives:

Our employees, agents and contractors including companies that provide services in relation to telecommunications and postage, data storage, document production and destruction, IT and IT security, customer loyalty programmes, fraud detection, making and receiving payments, data analysis and management information, credit checking, risk analysis, complaints handling, marketing and market research.

#### Government, Statutory and Regulatory Bodies

State regulators and authorities such as the Data Protection Commission, the Revenue Commissioners, the Central Bank of Ireland and the Financial Services & Pension Ombudsman; Law Enforcement Agencies such as An Garda Síochána & The Criminal Assets Bureau.

We may also disclose your personal data to the following recipients or categories of recipients:



- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Chill Money or substantially all of its business or assets are acquired or transferred to a third party whether in the event of a merger, reorganisation, transfer of undertakings, receivership, liquidation or other winding up or any other similar circumstances, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any law, legal obligation or court order, or in order to enforce rights under the GDPR or other agreements.
- To protect our rights, property or safety, our customers, or others. This includes exchanging information with other companies and organisations for the maintenance and security of the site and services.

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## 5. When we may contact you

We may contact you by phone/email/sms/post for the following purposes:

- Marketing Chill products and services – where you have provided your consent to such contact.

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## 6. Automated individual decision making including profiling

The processing activities outlined in Section 4 do not involve automated individual decision making including profiling. For details on automated individual decision making carried out by AvantCard DAC please check their [privacy policy](#).

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## 7. Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. This means that the period of time for which we store your personal data may depend on the type of data we hold. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. For more information about our data retention policies please contact our data protection officer at the contact details listed in Section 1 of this Policy.

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## 8. Subject Rights

The rights outlined below apply to the processing activities carried out by Chill Money where we are a controller of your data for the purposes outlined in section 4. To exercise your rights for all other processes please read [Avant Cards privacy policy](#).

### a. Right to rectification

You have the right to have Chill correct any inaccurate personal data we have collected about you. You also have the right to have incomplete personal data completed; you may provide us with supplementary information to do this. To do so, please contact us on 01 5565500 or

### b. Right to erasure

In certain instances, you have the right to have Chill erase the personal data we have collected about you. This right will not apply where we are required to process personal data in order to comply with a legal obligation or where the processing of this information is carried out for reasons of public interest in the area of public health.

To exercise this right, please contact our data protection officer at the contact details listed in Section 1 of this Policy.

### c. Right to object

You have the right to object to the processing of your personal data at any time:

- For direct marketing purposes.
- For profiling to the extent it relates to direct marketing.
- Where we process your personal data for the purposes of legitimate interests pursued by us, except where we can demonstrate compelling legitimate grounds for this processing which would override your interests, rights and freedoms or in connection with the enforcement or defence of a legal claim.

Should this occur, we will no longer process your personal data for these purposes unless doing so is justified by a compelling legitimate ground as described above.

To exercise your right to object, please contact our data protection officer at the contact details listed in Section 1 of this Policy.

**NOTE:** We will use all reasonable efforts to communicate the fact that you have exercised your **right to rectification** or **erasure of personal data** or **restriction of processing** in accordance with these rights outlined above, to each recipient to whom your personal data has been disclosed in accordance with this Policy, unless this proves impossible or involves disproportionate effort.

### d. Right to restrict processing

You have the right to have Chill restrict the processing of your personal data where one of the following applies



- You contest the accuracy of the personal data (we will restrict the processing of the personal data until we verify the accuracy of the personal data)
- The processing is unlawful and you oppose the erasure of your personal data
- Chill Money no longer requires the personal data for the purposes of the processing but the data is required by you for the establishment, exercise or defence of legal claims
- You object to the processing of the personal data as outlined in Section 9.c above (we will restrict the processing of the personal data while we verify our legitimate grounds for the processing which may override your interests, rights and freedoms)

Where you have restricted the processing of your personal data, we will continue to store your personal data but will only process it with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of other people or for reasons of important public interest or other non-restricted purposes

### **e. Right to access**

You have the right to obtain from us information on the personal data we hold on you including the following:

- Purposes of the processing
- Type of personal data held
- Categories of recipients of the personal data
- Information on how long the data will be stored
- If automated individual decision making, including profiling, takes place, as well as information on the logic involved and consequences of this
- If data is not collected directly from you, information on the source of the data
- The existence of the right to request from us rectification or erasure of your personal data or restriction of processing of your personal data or to object to such processing
- The right to lodge a complaint with the Data Protection Commission

Any such request should be submitted in writing and sent for the attention of the data protection officer at the contact details listed in Section 1 of this Policy. We will need to verify your identity in such circumstances and may request more information or clarifications from you if needed to help us locate and provide you with the personal data requested. There is usually no charge applied to access your personal data (or to exercise any of the other rights). However, if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee. Alternatively, we may refuse to comply with your request in these circumstances.

### **f. Right to portability**

You have the right to receive personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format. You also have the right to provide this data to another controller or have Chill transmit this data to another controller on your behalf, where technically feasible. This applies to automated data only to the extent provided by you to us. This right to portability is limited to the following situations

- Where the processing is based on the legal basis of consent





- Where the processing is based on the legal basis of entering into or performance of a contract

### **g. Right to withdraw consent**

Where we are processing your personal data on the legal basis of consent, you are entitled to withdraw your consent at any time. We carry out most of our marketing activities based on your consent. It is your choice to receive these communications and you have the right to withdraw your consent at any time. This does not affect the legality of the processing which took place when we had your consent.

If you would prefer not to receive this type of communication from us, you can withdraw your consent at any time by emailing [hello@chillmoney.ie](mailto:hello@chillmoney.ie). Please note if you withdraw your consent, we will no longer send direct marketing communications to you.

### **h. Right to complain**

If you are not satisfied with our use of your personal data or our response to any request by you to exercise any of your rights in Section 9, then you have the right to complain to the Data Protection Commission (DPC). Please see below for contact details of the DPC.

#### **The Data Protection Commissioner**

**Canal House  
Station Road  
Portarlinton  
Co. Laois**

**Phone: +353 (0)761 104 8000**

**LoCall: 1890 25 22 31**

**Fax: +353 (0)57 8684757**

**Email: [info@dataprotection.ie](mailto:info@dataprotection.ie).**

## **9. International Transfers**

Some of our suppliers who provide us with services such as IT security or data hosting services may process your personal data outside the European Economic Area (“EEA”) where privacy laws may not be as protective as those in your jurisdiction. There are special requirements set out under Chapter V of the GDPR to regulate such data transfers and ensure that adequate security measures are in place to safeguard and maintain the integrity of your personal data on transfer.

Where we transfer your personal data outside the EEA to our suppliers, we will make sure that it is protected to the same extent as in the EEA and we will use at least one of the following safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA.



- Transfer it to organisations that are compliant with the EU/US Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to those used and expected within the EEA.

## 10. Cookies

For further details on our use of cookies, please refer to our Cookie Policy which you can view by visiting: <https://s3-eu-west-1.amazonaws.com/chill-assets/documents/Cookie-Policy-Chill-Money.pdf>

## 11. Security

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Policy. We will use all reasonable efforts to put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, other recipients and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use reasonable procedures and security features to try to prevent unauthorised access. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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## 12. Changes to the Website Privacy Policy

Any changes to this Privacy Policy will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

## 13. Questions or Complaints

**Contact us.** If you have any questions or complaints relating to this Policy, please contact us at:

**Data Protection Officer**  
**Chill Money**  
**Ravenscourt Business Park**  
**Sandyford**  
**Dublin 18**  
**D18 K267**  
Email: [dpo@chill.ie](mailto:dpo@chill.ie)

