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1. INTRODUCTION – PRIVACY POLICY

If you are a visitor to the Rockwell Financial Management Website or a user of a Rockwell Financial Management Service (“Services”), then except as expressly set forth below, this Privacy Policy applies to your use of such Website or Service.

If you are a visitor to or user of a third-party website or service (“Third-Party Property”) that utilises any Rockwell Financial Management communication or messaging products, then any information you submit to such Third-Party Property is collected under the privacy policy of the owner of such Third-Party Property, and you should contact such owner with any related requests or inquiries you may have. If you have any inquiries specifically directed towards Rockwell Financial Management, please email us at [Rockwell Financial Management](#)

At Rockwell Financial Management, we respect the privacy rights of our users and recognise the importance of protecting the personal information we collect about you. Our Privacy Policy is designed to help you understand what information we collect and how we use and share that information. This Privacy Policy applies to our Websites and Services.

As used in this Privacy Policy, “Rockwell Financial Management,” “us” and “we” refers to Rockwell Financial Management and its affiliates. The “**Website**” means Rockwell Financial Management websites and the “**Services**” means Rockwell Financial Management communications, applications and services, in each case in whatever format they may be offered now or in the future. The Websites and Services are collectively referred to herein as the “**Offerings**.”

Rockwell Financial Management is regulated by the Central Bank of Ireland and is entered on its register under number 519214.

You understand that this privacy policy deals with your relationship with Rockwell Financial Management. When contracting with an insurer for a Rockwell Financial Management product using the Rockwell Financial Management website you understand that you enter into a separate agreement with the insurer and that you should review the terms and conditions of the relevant Rockwell Financial Management product to determine what use the insurer may make of your data, or what additional terms and conditions apply to that insurer’s use, that is additional to the use that is envisaged by this privacy policy.

2. INFORMATION WE COLLECT

a) **Information Related to Your Interaction with Rockwell Financial Management and the Offerings.**

*i. **Registration and Contact Information.***

We collect information about you when you (a) register to use the Services and (b) otherwise provide contact information to us via email, mail, or through our Offerings. This information you provide may include your username, first and last name, email address, mailing address or phone number.

*ii. **Payment Information.***

When you purchase the Services, we will also collect transaction information, which may include your credit card information, billing and mailing address, and other payment-related information (“**Payment Information**”).

*iii. **Technical, Usage and Location Information.***

We automatically collect information on how you interact with the Offerings, such as the IP address from which you access the Offerings, date and time, information about your browser, operating system and computer or device, pages viewed and items clicked. We may also collect location information, including

location information automatically provided by your computer or device. We use cookies and similar technologies to collect some of this information.

iv. *Third Party Platforms.*

We may collect information when you interact with our advertisements and other content on third-party sites or platforms, such as social networking sites. This may include information such as “Likes”, profile information gathered from social networking sites or the fact that you viewed or interacted with our content.

v. *Other Information.*

We may collect other information from you that is not specifically listed here. We may use any such information in accordance with this Privacy Policy or as otherwise permitted by you.

vi. *Union Memberships.*

Where you are applying or using our website to deal with a Rockwell Financial Management product in connection with a union membership, details of your union membership and your profession.

vii. *Health Information.*

Where you are applying or using our website to deal with a Rockwell Financial Management product in connection with life assurance or health insurance, details concerning your health, sexual preferences, age and whether you are a member of a Trade Union. Other sensitive data may be collected in the event of a claim, details of which will be provided at that time.

viii. *Call information*

Calls are recorded for quality and training purposes

b) Customer Data.

You may submit various types of information and data into the Services for hosting and processing purposes (“**Customer Data**”). Customer Data may include, without limitation, (a) personal information such as names, email addresses and phone numbers of your end user customers, potential customers and other users of and visitors to your websites, apps and other properties (“**People**”), which information may be input into the Services by you or collected by the Services using Rockwell Financial Management tags, scripts and other code implemented on such properties, and (b) information contained in communications between you and People using the messaging features of the Services.

We will only use, disclose and otherwise process Customer Data for the purposes set forth in your agreement with us for the provisioning of the Services.

3. HOW WE USE THE INFORMATION WE COLLECT

We use your information in the following ways:

- To provide, maintain and improve the Offerings and our other products and services, including to operate certain features and functionality of the Offerings (for example, by remembering your information so that you will not have to re-enter it during this or subsequent visits);
- To process your enquiries and otherwise deliver customer service;
- To quote or process your purchase of a Rockwell Financial Management product on behalf of an insurer.
- To process your payments, we share and use Payment Information;
- To process your claim for a payment in connection with a Rockwell Financial Management product on behalf of an insurer and also on your behalf.

- To control unauthorised use or abuse of the Offerings and our other products and services, or otherwise detect, investigate or prevent activities that may violate our policies or be illegal;
- To analyse trends, administer or optimise the Offerings, monitor usage or traffic patterns (including to track users' movements around the Offerings) and gather demographic information about our user base as a whole;
- To communicate directly with you, including by sending you newsletters, promotions and special offers or information about new products and services;
- To deliver you advertising, including by serving and managing ads on the Offerings or on third party sites and to tailor ads based on your interests and browsing history; and
- In the manner described to you at the time of collection or as otherwise described in this Privacy Policy.

4. SHARING YOUR INFORMATION WITH THIRD PARTIES

We do not sell, trade, share or transfer your personal information to third parties except in the following limited circumstances:

- We may share your personal information with third-party service providers to permit such parties to provide services that help us with our business activities, which may include assisting us with marketing, advertising our product/service offerings, or providing, maintaining and improving the features and functionality of the Offerings, among other things.
- We may share your personal information when we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce a Customer Agreement, including investigation of potential violations thereof, or (c) protect against imminent harm to our rights, property or safety, or that of our users or the public as required or permitted by law;
- We may share your personal information with third parties (including our service providers and government entities) to detect, prevent, or otherwise address fraud or security or technical issues;
- We may share your personal information with our business partners who offer a service to you jointly with us, for example when running a cross-promotion;
- We may share your Payment Information to process your payments;
- We may share and/or transfer your personal information if we become involved in a merger, acquisition, bankruptcy, or any form of sale of some or all of our assets;
- We may share your personal information with a third party if we have your consent to do so.

We will also share your personal information in the following situations as part of our offerings

- Any insurer that is a party to a Rockwell Financial Management product that you have applied for or contracted for.
- if you have indicated when applying for a Rockwell Financial Management product or at any time during your time as a user of the Rockwell Financial Management website, that you are happy to receive information or promotions from selected third parties about goods and services which may be of interest to you, you consent to third parties that we choose sending you such offers or information. You may opt out of receiving such offers or change your preferences at any time.
- Any member of our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries.
- Any co-insurers of the insurers for which we act as brokers.
- Our advisors.
- Where you are applying or using our website to deal with a Rockwell Financial Management product in connection with a Union membership, to your Union.

- To a credit referencing agency and/or to other insurers through various databases to help us check information provided and also to prevent fraudulent claims.
- To the prospective seller or buyer of any business or assets related to the Rockwell Financial Management website, a Rockwell Financial Management product or all or part of [Rockwell Financial Management]

We may also share aggregated or anonymised information with third parties for other purposes. Such information does not identify you individually, but may include usage, viewing and technical information such as the types of Offerings our customers and users generally use, the configuration of their computers, and performance metrics related to the use of Offerings which we collected through our technology. If we are required under applicable law to treat such information as personal information, then we will only disclose it as described above. Otherwise we may disclose such information for any reason.

5. OTHER ACCESS TO OR DISCLOSURE OF YOUR INFORMATION

The Offerings may also contain links to third party websites. This Privacy Policy applies solely to information collected by us. Even if the third party is affiliated with us through a business partnership or otherwise, we are not responsible for the privacy practices of such third party. We encourage you to familiarise yourself with the privacy policies of such third parties to determine how they handle any information they separately collect from you. Please be aware that we do not warn you when you choose to click through to another website when using the Offerings.

The Websites contain features that enable you to post reviews, comments or other content that is publicly viewable. You should be aware that any personal information you submit as part of those posts can be read, collected, or used by other visitors to the Websites, and could be used to send you unsolicited messages. We are not responsible for the personal information you choose to publicly post on the Websites.

It may be necessary to transfer your personal information to other group companies or service providers located in countries outside of the European Economic Area (EEA). This may happen where our servers or suppliers and service providers are based outside of the EEA or where you use our services and products while visiting countries outside of the EEA. The data protection and other laws of these countries may not be as comprehensive as those in Ireland or the EU but in these instances we will take steps to ensure that your privacy rights are respected. You agree that we may transfer your personal data on that basis.

6. YOUR CONTROL AND CHOICES

a) Opt-Outs.

We may provide you with the opportunity to “opt-out” of having your personal information used for certain purposes when we ask for this information. If you decide to opt-out, we may not be able to provide certain features of the Offerings to you.

b) Communication Preferences.

If you no longer wish to receive our promotional communications, you may opt-out of receiving them by following the instructions included on such communications or on the Offerings. Please note, however, that you may be unable to opt-out of certain service-related communications.

c) Blocking Cookies.

You can remove or block certain cookies using the settings in your browser but the Offerings may cease to function properly if you do so.

7. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

When you use the Offerings, we make good faith efforts to provide you with access to your personal information upon your request and either provide you the means to correct this information if it is inaccurate or to delete such information at your request if it is not otherwise required to be retained by law or for legitimate business purposes. You may access, review, correct, update, change or delete your information at any time by using the Dataships Widget on located on our privacy policy page on our website. If you are not satisfied with that information provided there please contact hello@rockwellfinancial.ie. We may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort (for instance, requests concerning information residing on backup tapes), jeopardise the privacy of others or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge.

Please note that if you cease using the Service or we terminate your access to the Service in accordance with your Customer Agreement, you may no longer have the ability to access or update your information.

We may retain your information as necessary to support the Offerings, comply with our legal obligations or resolve disputes. Note that content you post may remain on the Offerings even if you cease using the Offerings or we terminate your access to the Offerings.

8. CHANGES TO THE PRIVACY POLICY

We reserve the right to change our Privacy Policy at any time. If we make changes, we will post them and will indicate on this page the policy's new effective date. If we make material changes to this policy, we will notify you by email or through notice on the Offerings.

9. SECURITY

The security of your personal information is important to us. We maintain a variety of appropriate technical and organisational safeguards to protect your personal information. We limit access to personal information about you to employees who we believe reasonably need to come into contact with that information to provide products or services to you or in order to do their jobs. Further, we have implemented reasonable physical, electronic, and procedural safeguards designed to protect personal information about you. When you enter sensitive information (such as your password), we encrypt that information in transit using industry-standard Transport Layer Security (TLS) encryption technology. No method of transmission over the Internet, method of electronic storage or other security methods are one hundred percent secure. Therefore, while we strive to use reasonable efforts to protect your personal information, we cannot guarantee its absolute security.

10. Right to complain

You have the right to lodge a complaint in relation to anything involving your personal data. We would appreciate that you would contact us initially with your complaint, in order for us to rectify the issue.

Contact

You may contact us at the following addresses:

Email: hello@rockwellfinancial.ie

Address:

Rockwell Financial Management

The Old Station House,

15a Main St,

Blackrock,

Co. Dublin

If you are still not satisfied with our response, you have the right to lodge a complaint with the Data Protection Commission

<https://forms.dataprotection.ie/contact>

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

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