

LIA WEBSITE PRIVACY NOTICE

Effective 1st December 2022

This privacy notice tells you about the information we collect from you when you use our website. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

Who are we?

We are LIA (Life Insurance Association Ireland CLG). Our address is LIA House, 183 Kimmage Road West, Dublin 12. You can contact us by post at the above address, by email at queries@lia.ie or by telephone on 01-4563890.

We are not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details above.

How we use your information

[When you use our website - Cookies](#)

[When you submit an enquiry via our website](#)

[When you create an account on our website](#)

[When you purchase a course module from our website](#)

[When you sit an exam online with us](#)

[When you purchase membership from our website](#)

[When you register to attend an event from our website](#)

[Why/when/how we share your data with third parties](#)

[Your rights as a data subject](#)

[Your right to complain](#)

[Updates to this privacy policy](#)

When you use our website - Cookies

When you use our website to browse our products and services and view the information we make available, a number of cookies are used by us and by third parties to allow the website to function, to collect useful information about visitors and to help to make your user experience better.

For more information about our use of cookies, please see our **Cookie Policy**.

We do not knowingly process children's personal data as our services are not designed for children.

When you submit an enquiry via our website

When you submit a general enquiry via our website, we ask you for your name, contact telephone number and email address.

We use this information to respond to your query, including providing you with any requested information about our products and services. We may also email you several times after your enquiry in order to follow up on your interest and ensure that we have answered it to your satisfaction. We will process your information based on our legitimate interest in providing accurate information (prior to a potential sale).

Your enquiry is stored and processed on our email servers and your information may be shared with LIA administrators in different departments depending on the nature of your enquiry.

We do not use the information you provide to make any automated decisions that may affect you.

We delete website enquiry emails six months after they are deemed to be closed.

When you create an account on our website

When you create an account on our website, we ask for your name and email address.

We require this information in order to set up your account and to ensure that your email address is not already associated with any other account on our system, as it is the 'unique identifier' in our system.

Your information is stored on our CRM system (on our premises) and Learning Management system (on our cloud servers), all of which are based within the European Union.

We do not use the information you provide to make any automated decisions that may affect you.

Accounts are deleted after two years if the person has not purchased a module, event or membership with us at that stage, and if the person is not designated an 'LRO' by their employer (LIA Relationship Officer).

When you purchase a course module from our website

When you purchase a course module from us online, you will already have set up an account on our system so we already have your name and email address. The additional information we ask for when you purchase a course module from us is home and correspondence address and contact telephone number.

Your information is stored on our CRM system (on our premises) and Learning Management system (on our cloud servers), all of which are based within the European Union.

Level 7 and Level 9 modules

If you are enrolling on one of our Level 7 or Level 9 modules, run in conjunction with our Education accreditation partner ATU Sligo, you will also be asked to provide the following:

- Birthday
- Gender
- Country of Birth
- Nationality
- PPSN
- HEA Code - Country of Birth
- HEA Code – Nationality

LIA collects the above information on behalf of ATU Sligo as an authorised agent and in performance of its contractual obligations and data processor on behalf of ATU Sligo; as part of ATU Sligo's obligations as a Higher Education Institute (HEI), it is obliged to report certain information to the Higher Education Authority for statistics reporting purposes. The Higher Education Authority has mandated that HEI's must collect PPSN's as part of that reporting function and LIA has entered into a contract with ATU Sligo to allow it to lawfully collect that information on its behalf.

LIA does not require your PPSN for any purpose, save as authorised agent and data processor for ATU Sligo. Your PPSN is immediately encrypted when you enter it onto our system and the information is not visible or readable to LIA whilst it is temporarily stored on our servers (typically for a period of between 3-12 weeks depending on how early in the term the student has registered). LIA transfers your personal data required for enrolment with ATU Sligo typically 1 week after the term close off, including your encrypted data. Once the data has been transferred in an encrypted manner to ATU Sligo (typically 1 week after the term close-off), this data is deleted from our servers.

Payment by credit card

We will use your information to verify your credit card details for your purchase and to process your order, deliver your products or services and fulfil our contract with you.

We will send you a receipt via email and we may use your telephone number to contact you regarding your purchase.

Your credit card details are passed to a third-party payment processor (Stripe, Inc.) who store your data in the EU on securely encrypted web servers in line with PCI level 3.2 certification. LIA does not retain your credit card information. If you pay us online, we do not see your credit card information, if you submit your credit card information to us in writing (on a form or in an email) this is securely disposed of as soon as it is processed.

Company Portal

If you have given us details of the company you work with and that company has signed up for use of our Company Portal, some of your information will be visible to the LIA Relationship Officer(s) in that company on the basis of performing our obligations with that company. Your information is shared in this way for the purposes of your company meeting the requirements of the Central Bank's Minimum Competency Code and includes details of exam registrations and results, designation status, qualifications held, event registrations and CPD status.

We do not use the information you provide to make any automated decisions that might affect you.

We keep your information for an indefinite period, as it relates to your education history.

When you sit an exam online with us

If you choose to avail of an online exam sitting with us, you will be asked to create an account with the third-party companies we work with to provide this facility, namely an invigilation company ProctorExam and Speedwell Software, a company that will deliver the exam itself. These companies will need to collect personal data essential to the delivery of the service to you (such as name, email address, contact phone number etc).

In order to provide its service, ProctorExam will require remote access to your device, your device's camera and its microphone for the duration of the examination. During the exam ProctorExam will monitor you, thus collecting biometric data, a special category of data. As this service requires a special category of personal data, ProctorExam will seek your explicit consent to collect this data. If you are enrolling online for the 'online' exam venue, consent will be collected via a tick box that includes a link to the details of what you are consenting to. If you haven't enrolled online for the 'online' exam venue, and decide afterwards to sit your exam online, you will be required to download, digitally sign and return the consent form to us. You are not required to provide this consent if you do not wish to and can instead choose to sit a physical examination at the next available physical sitting.

A recording of you sitting your exam will be retained until your result has been published and the date for appealing your result has passed. After this, the recording and all personal data collected from you, will be securely deleted by ProctorExam.

LIA has robust Data Processing agreements in place with the third-party companies involved in delivering its exams online, and all processing is carried out in compliance with the GDPR. Part of ProctorExam's service is based outside the EEA, in the United States. They have Standard Contractual Clauses in place with those companies. This is an approved mechanism by the European Commission for transferring personal data to the United States.

Please see a copy of ProctorExam's privacy policy [here](#). Please see Speedwell's privacy policy [here](#).

LIA carried out a full Data Privacy Impact Assessment (DPIA) prior to engaging the services of ProctorExam and Speedwell to offer the online exam facility.

When you purchase membership from our website

When you purchase membership from us online, you will already have set up an account on our system so we already have your name and email address. The additional information we ask for when you become a member is a correspondence address, contact telephone number, date of birth and credit card information. Additionally, we ask you to select an LIA Region so that you can be kept informed about LIA events and activities for your chosen region. We also ask if you are a Tied Agent of any organisation, to ensure that we correctly understand your work situation.

We will use your information to verify your credit card details for your purchase and to process your order. We will also send you a receipt via email and we may use your telephone number to contact you regarding your purchase.

We require this information in order to process your payment, deliver your products or services and fulfil our contract with you.

Your information is stored on our CRM system (on our premises) and Learning Management system (on our cloud servers), all of which are based within the European Union. Your credit card details are passed to a third-party payment processor (Stripe, Inc.) who store your data in the EU on securely encrypted web servers in line with PCI level 3.2 certification. LIA does not retain your credit card information. If you pay us online, we do not see your credit card information, if you submit your credit card information to us in writing (on a form or in an email) this is securely disposed of as soon as it is processed.

Company Portal

If you have given us details of the company you work with and that company has signed up for use of our Company Portal, some of your information will be visible to the LIA Relationship Officer(s) in that company on the basis of performing our obligations with that company. Your information is shared in this way for the purposes of your company meeting the requirements of the Central Bank's Minimum Competency Code and includes details of exam registrations and results, designation status, qualifications held, event registrations and CPD status.

We do not use the information you provide to make any automated decisions that might affect you.

We keep your order information for the duration of your membership with us and for six years after your membership ceases with us (if you have no education history with LIA). If you also have an education history with LIA, we will keep your data for an indefinite period, as it relates to your education history.

When you register to attend an event from our website

When you register to attend an event online, you will already have set up an account on our system or you may already be a member. The only additional personal information we ask you for in order to register you to attend your chosen event(s) is your credit card information.

We will use the information you have already given us to verify your credit card details for your purchase and to process your order. We will also send you a receipt via email and we may use your telephone number to contact you regarding your purchase.

We require this information in order to process your payment, deliver your products or services and fulfil our contract with you.

Your information is stored on our CRM system (on our premises) and Learning Management system (on our cloud servers), all of which are based within the European Union. Your credit card details are passed to a third-party payment processor (Stripe, Inc.) who store your data in the EU on securely encrypted web servers in line with PCI level 3.2 certification. LIA does not retain your credit card information. If you pay us online, we do not see your credit card information, if you submit your credit card information to us in writing (on a form or in an email) this is securely disposed of as soon as it is processed.

Company Portal

If you have given us details of the company you work with and that company has signed up for use of our Company Portal, some of your information will be visible to the LIA Relationship Officer(s) in that company on the basis of performing our obligations with that company. Your information is shared in this way for the purposes of your company meeting the requirements of the Central Bank's Minimum Competency Code and includes details of exam registrations and results, designation status, qualifications held, event registrations and CPD status.

We do not use the information you provide to make any automated decisions that might affect you.

We keep your order information for the duration of your membership with us and for six years after your membership ceases with us (if you have no education history with LIA). If you also have an education history with LIA, we will keep your data for an indefinite period, as it relates to your education history.

Why/when/how we share your data with third parties

LIA will not disclose any of your personally identifiable information unless it is necessary and we have a legal basis for doing so. We will only ever share the minimum amount of data necessary for the purposes of the processing being carried out by a third party, and we have strict processing agreements in place with any third party with whom your data is shared, to ensure the security and confidentiality of your information. Your data will only ever be shared in a secured format e.g. via VPN, secure cloud, encryption etc. We ensure that we have appropriate contracts in place to secure your personal data when sharing same.

Examples of those we may share your data with include:

- Our course partners; when a module you have enrolled on with us is delivered by one of our course partners (e.g. ATU Sligo) we will share only the information necessary for the module to be delivered to you as required by our contract with our partner.
- Your employer; for your employer to be/remain compliant with Central Bank regulations, we may share details of your exam enrolments, results, your designation status, details of LIA qualifications you hold and information relating to your CPD record in performing our contractual obligations to them.
- The Central Bank; if requested by the Central Bank we will share information relating to your designation and CPD records for regulatory purposes in adhering to regulatory requirements.

We will share with other third parties only when necessary, including postage fulfilment companies, our IT partners and cloud hosts based on our legitimate interests in effectively administering our business and in performance of our contractual obligations to you and others.

We do not transfer your personal data outside of the EU/EEA, save for the purposes of invigilation of online exams, should you choose to avail of this service. One of the partners we work with for this service collects and transfers some of your data to the United States. It has Standard Contractual Clauses in place with US companies used, which is recognised by the European Commission as providing adequate protection to the personal data of European citizens and in compliance with Article 45 of the GDPR.

Your rights as a data subject

By law, you can ask us what information we hold about you, access to that information, and you can ask us to correct this information if it is inaccurate. If we have asked for your consent to process your personal data, you may withdraw that consent at any time and we will advise you as to the implications of that request and if we can comply. Withdrawal of consent does not make previous processing unlawful.

If we are processing your personal data for reasons of consent or to fulfil a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.

If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.

You have the right to ask us to stop using your information for a period of time or indefinitely if you believe we are not doing so lawfully.

Finally, in some circumstances you can ask us not to reach decisions affecting you using automated processing or profiling.

To submit a request regarding your personal data by email, post or telephone, please use the contact information provided above in the **Who Are We** section of this policy.

Your right to complain

If you have a complaint about our use of your information, we would prefer you to contact us directly in the first instance so that we can address your complaint. Please contact GDPR@lia.ie to address your complaint. However, you can also contact the Data Protection Commissioner via their website at www.dataprotection.ie or write to them at:

Data Protection Commissioner
Canal House
Station Road
Portarlinton
R32 AP23 Co. Laois

Updates to this privacy policy

We regularly review and, if appropriate, update this privacy policy from time to time, and as our services and use of personal data evolves. If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.

We will update the "Effective date" at the top of this document each time it is changed.