



Privacy Policy

1. Introduction

We are fully committed to protecting and respecting your privacy. We wish to be transparent on how we process your personal data and demonstrate that we comply with the EU General Data Protection Regulation (GDPR) in relation to collection, use and retention of your personal data and ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain our information handling practices in relation to the information we collect about you and how it is used.

For the purposes of the GDPR the data controller is:

- IPM (Insurances) Ltd. t/a IPM Draper and IPM (Financial Services) Ltd. t/a IPM Draper Financial Brokers
- Ph +353 (0) 71 9143742, email enquiries@ipminsurances.com
- When we refer to 'we' it is IPM (Insurances) Ltd. and IPM (Financial Services) Ltd.

Please take time to read this Statement carefully as it sets out the basis on which any personal data, we collect from you, or that you provide to us, will be processed by us.

2. Who We Are

IPM Draper Insurance and Financial Brokers comprise of the following two entities dealing with general insurance and life, pensions, savings, mortgages and investments.

IPM (Insurances) Ltd. t/a IPM Draper is regulated by the Central Bank of Ireland as an insurance intermediary registered under the European Union (Insurance Distribution) Regulations 2018; and as an Investment Intermediary authorised under the Investment Intermediaries Act 1995.

IPM (Financial Services) Ltd t/a IPM Draper Financial Brokers is regulated by the Central Bank of Ireland as an investment intermediary under the Investment Intermediaries Act, 1995 (as amended) (IIA) and as an insurance intermediary under the European Union (Insurance Distribution) Regulations 2018 (IDR).

IPM (Financial Services) Ltd is also regulated by the Central Bank of Ireland as a Mortgage Credit Intermediary/Mortgage Intermediary under the European Union (Consumer Mortgage Credit Agreements) Regulations 2016 (CMCAR) and under the Consumer Credit Act, 1995 (as amended) (CCA).

We are Members of Brokers Ireland.

IPM (Insurances) Ltd. t/a IPM Draper is regulated by The Central Bank of Ireland IPM (Financial Services) Ltd. t/a IPM Draper Financial Brokers is regulated by The Central Bank of Ireland

Our principal business is to provide advice and arrange transactions on behalf of clients in relation to general insurance, life, pensions, savings, mortgages and investments.

We operate on the basis of fair analysis of the market, and we pay particular attention to identifying and recommending the product/s that best fulfil the specific needs of our customers.

Accordingly, the number of contracts and providers we share your data with must be sufficiently large to enable us as an intermediary acting on the customer's behalf, to recommend a product that would be adequate to meet a client's needs having regard to the client's fact-find and product suitability assessment.

The number of providers that constitutes 'sufficiently large' will vary depending on the number of providers operating in the market for a particular product or service and their relative importance in and share of that market. The extent of fair analysis must be such that could reasonably be expected of a professional conducting business, taking into account the accessibility of information and product placement to intermediaries and the cost of the search.

Our Data Protection Representative can be contacted directly here:

- Adrian McHale
- Email address adrian@ipmdraper.ie
- Phone number +353 (0) 71 9143742

3. How we collect your data

Through client fact-finds and general consultation we collect personal data in relation to our clients. In line with our terms of business, we provide intermediary services on a number of products which include, general insurance, life cover, serious illness cover, savings, investments, mortgages and pensions.

The personal information we collect varies depending upon the nature of our services. We will endeavour to provide you with an overview of those categories of personal data our organisation collects and our purpose for using that data.

We collect personal data in the following ways, if you:

- request any of our intermediary services outlined above
- contact us with a complaint or query
- apply for a position with us

4. What information do we collect?

The extent of the information we collect is dictated by the type of product/service you request from us and the extent of the information required by the product providers.

Comprehensive financial planning requires detailed information (as per our fact find) to provide our customers with a clear plan to consider going forward.

The information we collect about you includes the following:

- Contact and Identifying information – name, address, contact details; email, mobile, landline.
- Unique identifiers – PPS number, Pension scheme reference number, insurance policy numbers in order to establish details with your permission, particular details.
- Demographic details – age, gender, marital status, lifestyle, and insurance requirements; date of birth, dependents, photo ID. As well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy (e.g., your children/spouse).
- Family and Beneficiary Data – dependants, next of kin or nominated beneficiaries, Power of Attorney, Enduring Power of Attorney. Details of Solicitor/Tax Advisor/Accountant.
- Employment information – role, employment status (such as full/part time, contract), salary information, employment benefits, and employment history. This information is necessary for our Fact Find with our clients.
- Publicly available sources – information about you in the public domain such as Director information from the Companies Registration Office.
- Health information – information about your health status, medical records and medical assessment outcomes. We collect medical information relating to personal habits (e.g., smoking and consumption of alcohol) and medical history. We may also process certain special categories of information, for example information about your personal characteristics (biometric information) or disability information.
- Pensions and Insurance Benefits information – current benefits, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, Pension Adjustment Orders (PAO) etc.
- Financial details – bank account details, details of your credit history and bankruptcy status, salary, tax code, third-party deductions, bonus payments, benefits and entitlement data, national insurance contributions details.
- Claims Data (from you and any relevant third parties).
- Criminal records information – the existence of or alleged criminal offences, or confirmation of clean criminal records for motor products.
- Searches that we undertake in relation to sanctions, money laundering and credit – Anti Money Laundering (AML) and Politically Exposed Persons (PEP).

When we collect sensitive personal data as defined within the GDPR we will ensure that we require this information to deliver the required service, and we have your explicit consent and/or authorisation prior to our collection. Please see the further information contained in this Privacy Notice that outlines special categories of personal data.

5. How do we use your personal data?

Your Personal Data will be used to enable us to fulfil our contractual obligations in relation to your request for insurance, investment, protection, pension products, financial advice and quotes.

If you require further information on any of the above basis for processing your data, we can provide you with further details.

- Performing services for our clients and prospective clients – when you require insurance/investment products, we use your data to enable us to provide the required product.
- Statutory and other regulatory requirements – we are required to carry out various obligations which include:
 - AML/Sanction checking
 - Knowing your customer “Fact Find”
 - Adherence to the Consumer Protection Code
- Communication and any marketing sent to you.
- Process claims – the information sought will be relevant to the claim and not excessive.
- To contact you if required or to respond to any communications that you might send to us.
- Carry out our obligations arising from any contracts entered between you and us and to provide you with the information, products and services that you request.
- Provide professional services.
- Handling of complaints.
- To notify you about changes to our service.

6. Legal Basis

We need to ensure that we process your personal data lawfully. We rely on the following legal grounds to collect and use your personal data:

- Performance of a contract – when we enter a contract with you, we will collect and use your personal data to enable us to fulfil that service.

- Legal obligation – the use of some of your personal data is necessary for us to meet our legal obligations e.g., pension contributions for Revenue Certificates, regulatory purposes to the Central Bank.
- Sometimes we may rely on consent as a legal basis for processing your information. For example, we rely on consent to collect and use personal data for any criminal convictions or alleged offences. This is used when we need to assess risk relating to an insurance policy for you. We share this information with other third parties where it is necessary to manage these services provided to you – these services include insurance underwriters, reinsurers and other insurance providers.
- We may also rely on your consent to send direct marketing to you. We will ensure that we present this to you concisely. We will also ensure that we use clear and plain language and if you give us your consent you can withdraw this easily at any time.

7. Sharing your information with third parties

How we share your data

When required, we may make your information available to third parties with whom we have a relationship, where that third party is providing services on our behalf. We will only provide those third parties (data processors) with information that is necessary for them to perform the services. We will take measures to protect your information, such as putting in place Standard Contractual Clauses and confidentiality agreements.

- Insurance Partners where we need to manage the services provided to you such as Product Providers and insurance underwriters, reinsurers, and loss adjusters. You can refer to their privacy statements on their website for more information about their privacy practices.
- Vetting and risk management agencies such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the services. Legal advisers, loss adjusters, and claims investigators, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature.
- Medical professionals, e.g., where you provide health information in connection with a claim against your insurance policy; or when we are providing a quote for insurance.
- EU Law enforcement bodies, when required to do so by law and/or regulation, or another legal request.
- Public authorities, regulators and government bodies, where necessary for us to comply with our legal and regulatory obligations, or in connection with an investigation of suspected or actual illegal activity.

- Third-party processors: we outsource some of our processing operations to suppliers that process personal information on our behalf such as IT support, telecommunications, accounting, payroll and CRM provider.

These processing operations remain under our control, and we have data processing agreements in place with all our third party processors to ensure all processing is carried out in accordance with our security standards and the GDPR.

8. Cookies

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

For further information, visit allaboutcookies.org.

How do we use cookies?

IPM Draper Insurance and Financial Brokers uses cookies in a range of ways to improve your experience on our website, including:

Session Cookie:

This session cookie allows us to know you are the same person when you move from one page to the next, for both users who are logged in and for some users who have not logged in.

Third-Party Cookies:

We use suppliers who also set cookies on behalf of our website to provide certain features on the website and help us to review how our customers usage of the website, details of which we have included below along with links to their respective privacy policies which will detail how these suppliers use data they collect in more detail.

Google Analytics:

We use Google Analytics to determine how popular parts of our website are, to determine if you have been to the website before, and to securely and anonymously record the value of any purchases you make on our website. Google analytics sets cookies which will stay active for a number of years and identify on your computer that you have visited our website.

If you just want to find out more information about Google's privacy policy, then please click here <http://www.google.com/intl/en/analytics/privacyoverview.html>.

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- Functionality – IPM Draper Insurance and Financial Brokers uses these cookies so that we recognise you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

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- Advertising – IPM Draper Insurance and Financial Brokers uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. IPM Draper Insurance and Financial Brokers sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

How to manage cookies

Users can accept, reject or subsequently change their preferences through the cookies control. However, in a few cases, some of our website features may not function as a result.

9. Retention of your Personal Data

IPM Draper Insurance and Financial Brokers shall not keep personal data in a form that permits identification of data subjects for a longer period than is necessary.

The retention period for each category of personal data will be set out in our retention schedule along with the criteria used to determine this period, including any statutory obligations we have. Should you require further information we would be happy to provide.

Personal data will be disposed of securely.

10. Data Subjects Rights

We will facilitate your rights in line with our data protection policy and the subject access request procedure. This is available on request. At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.

- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that we refuse your request under rights of access, we will provide you with a reason as to why.

11. Complaints

In the event that you wish to make a complaint about how your personal data is being processed, you have the right to lodge a complaint directly with the Supervisory Authority and our named data protection representatives at the contact details given in this privacy statement.

You may also lodge a complaint with the Data Protection Commission in Ireland, whose details are:

Data Protection Commission
Canal House,
Station Road,
Portarlinton,
Co. Laois, R32 AP23
Phone: +353 57 868 4800 / +353 761 104 800
Fax: +353 57 868 4757
Web: www.dataprotection.ie
Email: info@dataprotection.ie

12. Security of Your Personal Data

Our intent is to strictly protect the security of your personal information; honour your choice for its intended use; and carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration or destruction. We have taken appropriate steps to safeguard and secure information we collect such as credit card information.

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us on:

T: +353 (0) 71 9143742
E: enquiries@ipminsurances.com

13. Failure to Provide Further Information

If we are collecting your data for a contract and you cannot provide this data, the consequences of this could mean the contract cannot be completed or details are incorrect.

14. Privacy Statement Changes

IPM Draper Insurance and Financial Brokers may change this privacy statement from time to time. When such a change is made, we will post a revised version on our website.

Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy statement periodically so you're aware of any changes. By using our services, you agree to this privacy statement.

This privacy statement was last reviewed 1 October 2026.