



## RSA Insurance Ireland and Northern Ireland – Recruitment Data Protection Notice

At RSA, we're committed to ensuring your personal data is protected. This Notice explains how we use the information we collect about you during our recruitment process. It also tells you about your data protection rights.

### 1. Who are we?

Where we refer to “we” “us” “our”, we mean RSA Insurance Ireland DAC and RSA Northern Ireland Insurance Limited, subsidiaries of Intact Financial Corporation ('Intact'). We provide commercial and personal insurance products and services. We are a Data Controller in relation to the personal information we collect and hold about you. Whether your specific Data Controller is RSA Insurance Ireland DAC or RSA Northern Ireland Insurance Limited, depends on which business the role you apply for is with. Our contact information is:

RSA Insurance Ireland: RSA House, Dundrum Town Centre, Sandymount Road, Dundrum, Dublin 16, D16 FC92, Ireland.

RSA Northern Ireland Insurance: Artola House, 91-97 Victoria Street, Belfast, BT1 4PB, Northern Ireland.

### Representatives

The EU General Data Protection Regulation ('EU GDPR') requires organisations that are not established in the European Union ('EU') to designate a representative in the EU if they are subject to the EU GDPR, for example offering products or services to EU citizens.

Intact may undertake processing activities to which the EU GDPR applies and as they don't have an establishment in the EU, they have appointed an EU Representative, RSA Luxembourg S.A, to act on their behalf. The EU representative can be contacted directly at the following address [rsa.dp@eu.rsagroup.com](mailto:rsa.dp@eu.rsagroup.com). The EU Representative will address any issues and/or queries you may have relating to Intact's processing of your personal data. The EU representative will also deal with data subject rights requests for EU citizens and enquiries by EU supervisory authorities on Intact's behalf. RSA Northern Ireland's EU representative is RSA Insurance Ireland DAC and can be contacted as per Section 9 below.

### UK Representatives

Intact's UK representative is Royal & Sun Alliance Insurance Limited. The UK representative can be contacted at [dataprotectionofficer@uk.rsagroup.com](mailto:dataprotectionofficer@uk.rsagroup.com). RSA Insurance Ireland DAC's UK representative is RSA Northern Ireland Insurance Limited and can be contacted at [ni\\_dataprotection@ie.rsagroup.com](mailto:ni_dataprotection@ie.rsagroup.com).

### 2. What information do we collect about you and for what purposes?

The following (non-exhaustive) types or categories of personal information that we may collect and use about you includes: personal data such as your name, gender, contact details, CV, current salary, qualifications, employment history, eligibility to work, CCTV footage at our offices and also criminal convictions history data. Your personal data will be used to assess your suitability for a job vacancy, and we will verify the accuracy of the information you have provided, where possible.

We collect conviction data for the purpose of meeting the Central Bank of Ireland's Fitness and Probity requirements or the Financial Conduct Authority (UK) Insurance Distribution Directive or Senior Managers and Certification Regime requirements. Further detail on these is available on the Central Bank and Financial Conduct Authority's websites.

**Note:** You don't have to provide us with any personal information, but if you don't provide information that we need then we may not be able to proceed with your role application. We will let you know what information is required to proceed with your application.

In Northern Ireland, to fulfil our statutory obligations and for our internal equal opportunities monitoring we gather personal data (including Special Categories of Personal Data) such as your gender, disability (within the meaning of the Equality Act 2010), race or ethnic origin, sexual orientation, marital status, and religion. This information will be treated confidentially and will not affect your application in any way. In addition, to comply with the Fair Employment and Treatment (Northern Ireland) Order 1998, we will ask you to confirm your 'community background' (religious belief). If you do not provide this information we're encouraged to use the other information available to us to provide a reasonable indication of your community background. We share information on applicant gender and community background with the Equality Commission, as required by the above Order.

We're keen to keep our relationship with you as future potential talent. Where you let us, we'll keep your details and CV, so that we can contact you should a role become available that we feel is suitable for you (job alerts).

The below table describes the purposes for which we use your personal data and the legal basis for doing so.

Purpose	Legal Basis
To provide you with information about applied for job vacancies and answer any of your queries.	<p>Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract.</p> <p>Processing is necessary to comply with legal obligations e.g. the regulatory requirements referenced above.</p>
To assess information you have provided, carry out the interview process and decide whether you may be suitable for a job vacancy (including in some cases psychometric or other tests).	
To verify your identity and to verify the accuracy of the information we receive.	
To let you know about future roles which may be of interest to you (job alerts).	Processing is based on your consent.
To establish, exercise or defend legal claims or manage and investigate any complaints.	<p>Processing is necessary to comply with legal obligations e.g. as required by the Workplace Relations Commission.</p> <p>Processing is necessary for the purposes of our legitimate interests to deal with legal disputes and issues.</p>
To comply with laws and regulations.	Processing is necessary to comply with legal obligations.
To carry out statistical analysis of your personal data including gender, age, and nationality.	Processing is necessary for the purposes of our legitimate interests to monitor the existence or absence of equality of opportunity or treatment.
To carry out statistical analysis of your disability (within the meaning of the Equality Act 2010), race or ethnic origin, sexual orientation, marital status, and religion. <i>Northern Ireland only.</i>	<p>Processing is necessary for the purposes of our legitimate interests to monitor the existence or absence of equality of opportunity or treatment.</p> <p>Processing is necessary for reasons of substantial public interest i.e. processing is necessary for promoting equality of opportunity and treatment.</p>
To confirm your 'community background' (religious belief). <i>Northern Ireland only.</i>	Processing is necessary to comply with legal obligations e.g. Fair Employment and Treatment (Northern Ireland) Order 1998.
For staff training, performance reviews and internal disciplinary purposes.	Processing is necessary for the purposes of our legitimate interests. This interest is to improve our recruitment processes, systems, and supplier performance.
To ensure the security of our systems; to make back-ups of your data in case of emergencies and for disaster recovery purposes.	<p>Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.</p> <p>Processing is necessary to comply with legal obligations e.g. Central Bank Guidance and Requirements.</p> <p>Processing is necessary for the purposes of our legitimate interests. The interest is to protect and to ensure the continuity of our business.</p>
To administer and improve our website. To make suggestions and recommendations to you as a user of our website about services that may be of interest to you. For further information please see our <b>Cookie Policy</b> (available on our website).	<p>Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract (i.e. use of cookies which are essential or strictly necessary to provide you with the service which you have requested).</p> <p>Processing is based on your consent.</p>

### 3. How else do we collect information about you?

Where possible, we will collect your personal information directly from you. However, on occasion we may receive information about you from other people or sources. For example:

- Recruitment agencies;
- Referees and previous employers;
- Training bodies and industry registers;

- From publicly available information e.g. social media and news media searches;
- Medical professionals (where required as part of the recruitment process and authorised/required by law);
- Personal data collected through website cookies processing e.g. IP address.

#### 4. Will we share your personal information with anyone else?

Your information may be shared within the Intact Group and with our service providers, which may result in transfers of your personal information outside of the European Economic Area ('EEA'). We will only do this by an approved "transfer mechanism" such as the European Commission adopted Standard Contractual Clauses, use of Binding Corporate Rules or as a result of an Adequacy decision of the European Commission. If you want more information on transfers or the safeguards we apply, please get in touch using the contact information below.

We may share your details with other third parties as part of our recruitment process:

- Anyone authorised by you to act on your behalf e.g. recruitment agencies;
- Anyone you have given us permission to speak to and other people or companies associated with you e.g. referees;
- Service providers who we use in the recruitment process such as recruitment agencies and other service providers such as our Information Technology suppliers, Cloud Service Providers, data storage providers, and documentation fulfilment providers;
- As a result of our legal and regulatory obligations or on based on a Court Order or Subpoena i.e. with law enforcement agencies and government departments including the Central Bank of Ireland, the Workplace Relations Commission, Equality Commission, the Revenue Commissioners/ Inspector of Taxes, HRMC, An Garda Síochána, the Criminal Assets Bureau, the Data Protection Commission.
- Our trusted partners, and with third parties where personal data is processed via the use of cookies or other similar technologies for specific purposes. For further information on the latter please see our **Cookie Policy**.

#### 5. Will we use any automated processing or profiling to make decisions about you?

We may conduct the following activities, which involve profiling:

- **Role Suitability** – during your application, we may ask some questions to help determine if you're suitable for the role based on the answers you provide;
- **Job Vacancies** – we will use profiling exercises to help us determine what future roles might be of interest to you.

The results of these may limit applications you're successful with or roles we contact you about, but they don't involve decisions being made solely based on automated (computer based) decision-making, as a person is always involved.

#### 6. For how long will we keep your information?

If you're successful in your application, your information will be retained as per our Employee Data Protection Notice which will be available to you before you start your role.

If you're unsuccessful, and you've signed up to job alerts, your information will be retained for 3 years for you to be notified of any future roles. If for any reason you want to withdraw your consent to receive information about future roles, please email [careers@ie.rsagroup.com](mailto:careers@ie.rsagroup.com) stating this.

If you have opted for us not to retain your information for job alerts, your information will be deleted:

- Republic of Ireland: after 12 months from the date you applied;
- Northern Ireland: after 3 years from the date you applied. Due to requirements to provide data to the Equality Commission and the Fair Employment (Monitoring) Regulations (Northern Ireland) 1999.

#### 7. What are your rights over the information that is held by us?

You have legal rights under data protection laws in relation to your personal information:

- 1) **Right to Rectification:** Correct any information we hold about you if you think it's incorrect or incomplete.
- 2) **Right to Erasure:** Request your personal information be deleted where you believe it's no longer required. We may not always be able to do this, for example, where we need to retain your personal data to meet legal or regulatory obligations.
- 3) **Right of Access:** Provide you with a copy of the personal information we hold about you.
- 4) **Right to Portability:** Request that we transfer a copy of the personal information you have given us, to another company. We would provide the information in a machine-readable format.
- 5) **Right to Restriction:** Request that we restrict the use of your personal information by us in certain circumstances.

6) **Right to Object:** Object to the processing of your personal data for any purpose where processing is necessary for the purposes of our legitimate interests (see table above).

7) **Right to Withdraw Consent:** To withdraw consent, where your consent is our basis for using your personal data.

8) **Right to Contest Decisions:** To contest decisions based solely on automated decision-making, obtain an explanation of the decision reached, express your point of view, and ask for human intervention.

If you would like to request any of the above Rights, please email us at [ie\\_dataprotection@ie.rsagroup.com](mailto:ie_dataprotection@ie.rsagroup.com) or write to us at one of the addresses at the top of this Notice. When you are making the request please provide us with your name, address, date of birth and the role title you applied for. You may need to provide us with a copy of your photo identification to ensure we do not provide your personal information to anyone that is not entitled to it.

All requests are free, unless we think your request is manifestly unfounded or excessive in nature. We aim to respond within one month from receipt of your request. If we cannot meet this time frame due to the complexity or repeated nature of a request, we will let you know as soon as possible and explain the reason for this.

Submitting a request does not mean we will be able to fulfil it or in its entirety – we are often bound by legal and regulatory obligations or may rely on a lawful exemption which restricts the scope of our obligations as a Data Controller. When this is the case, we will explain this to you in our response, and that you can lodge a complaint with the Data Protection Commission or Information Commissioner's Officer or bring the matter to Court.

## 8. Changes to our Data Protection Notice.

This Notice will be updated from time to time so please check it each time you submit personal information to us.

## 9. How do you ask a question about this Data Protection Notice?

If you any questions or comments about this Notice please contact:

The Data Protection Officer, RSA Insurance Ireland DAC, RSA House, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16, D16 FC92, Ireland. You may also email us at [ie\\_dataprotection@ie.rsagroup.com](mailto:ie_dataprotection@ie.rsagroup.com).

The Data Protection Officer, RSA Insurance Northern Ireland Limited, Artola House, 91-97 Victoria Street, Belfast, BT1 4PB, Northern Ireland. You may also email us at [ni\\_dataprotection@ie.rsagroup.com](mailto:ni_dataprotection@ie.rsagroup.com).

## 10. How can you complain?

If you're unhappy with how we have handled your personal information and wish to complain, please contact us using the above contact information. Our Data Protection Officer will investigate your complaint and will give you additional information about how it will be handled. We aim to respond normally within one month.

If you're not satisfied with our response, for Republic of Ireland you can contact the Data Protection Commission:

**Post:** Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28

**Phone:** 01 7650100 / 1800 437 737

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

**Web:** [www.dataprotection.ie](http://www.dataprotection.ie)

For Northern Ireland, you can contact the Information Commissioner's Office:

**Post:** Information Commissioner's Office, 3<sup>rd</sup> Floor, 14 Cromac Place, Belfast, BT7 2JB

**Phone:** 0303 123 1114

**Email:** [ni@ico.org.uk](mailto:ni@ico.org.uk)

**Web:** <https://ico.org.uk/about-the-ico/who-we-are/northern-ireland-office>