



# RSA Data Protection Notice

At RSA we are committed to ensuring that your personal data is protected. To keep you informed, we have created this notice which will explain how we use the information we collect about you and how you can exercise your data protection rights.

## 1. Who are we?

We are RSA Insurance Ireland DAC ('RSA') and we provide commercial and personal insurance products and services. We also provide insurance services in partnership with other companies. We are a Data Controller in relation to the personal information we collect and hold about you.

### UK Representative

As RSA Insurance Ireland DAC does not have an establishment in the UK, we have appointed a representative based in the UK who may address any issues and/or queries you may have as a UK citizen relating to our processing of your personal data and/or with this Privacy Notice more generally.

Our UK representative will also deal with data subject rights requests for UK citizens and enquiries by the UK supervisory authority (the Information Commissioner's Office) on our behalf.

Our UK representative is RSA Northern Ireland Insurance Limited and can be contacted directly by email at the following address [ni\\_dataprotection@ie.rsagroup.com](mailto:ni_dataprotection@ie.rsagroup.com).

## 2. Why do we collect and use your personal information?

The following (non-exhaustive) types or categories of personal information that we may collect and use about you includes : name, address, date of birth, occupation, policy numbers, contact details, gender, driving licence details and penalty points information, marketing preferences and renewal dates of policies with other insurers, bank and payment card details, claims data, medical / health information, geo-location and driving behaviour data and on-line identifiers such as IP addresses. **Note:** You don't have to provide us with any personal information, but if you don't provide certain information that we need then we may not be able to proceed with your application for insurance or with a claim that you make. We will let you know what information is required to proceed with your application or claim.

RSA will use your personal information for the provision of insurance services such as providing a quotation, underwriting a policy and handling claims under an insurance contract. We will also use your personal data for other related matters such as complaints handling, prevention or detection of fraud, for reinsurance purposes and statistical analysis. In addition, if you have given us separate marketing consent, we will use your personal data (e.g. your name, address, telephone number and email address) to send you news and offers related to our products and services.



When looking for a quote for an insurance product from us, you will need to provide us with information relating to what you wish to be insured (e.g. car make and model, your home, details about you etc.). When buying certain products, we may need to collect special categories of data (e.g. health/ medical information) and driving offences or convictions history. If you can't provide this information, we will be unable to provide certain products or services to you.

In order to provide our products or services we will also need to process your payment information (e.g. direct debit, credit and debit card information, etc.) to collect payments from you and/or to issue any refunds or payments due to you. We may need to contact you if you request a quote from us and/or to service your policy. We may need to communicate with you via your intermediary (if applicable), and this may be done via our/their website, by email, SMS, telephone calls and/ or by post. Telephone calls with RSA may be recorded for training and verification purposes.

If you need to claim against your insurance policy, we normally need to collect information that evidences what happened in the incident. If other people are involved in the incident, we may also need to collect additional information related to them (including children) which can include special categories of data (e.g. injury and medical information).

When submitting an application to us, you may need to provide us with equivalent or substantially similar information relating to other proposed beneficiaries under the policy or claim. You agree that you will bring this Data Protection Notice to the attention of each beneficiary at the earliest possible opportunity. Please also ensure that anyone else who is insured under your policy or may be a beneficiary (e.g. arising from a claim settlement) has agreed to provide their personal information to us.

Secondary processing of your personal information (i.e. for a purpose other than for which it was collected) may be undertaken but only in accordance with data protection laws, e.g. where necessary and proportionate for the purposes of preventing, detecting, investigating or prosecuting criminal offences, or for the purposes of legal advice and legal proceedings.

We collect information through website cookies and other similar technologies (e.g. pixel trackers or 'like' buttons) when you visit our website. These tools are used by RSA and our third-party service providers to help improve our and their products and services, the functionality and performance of our websites and to support more effective advertising. For more information about how and why we use cookies please visit our **Cookie Policy**.

Data protection laws require us to meet certain conditions before we use your personal information in the manner described in this notice. In order to provide you with this information, we have prepared the following which describes the purposes for which we are using your personal data and the legal basis for doing so.

Purpose of Processing	Legal Basis
To provide you with a quote for an insurance product and to provide you with insurance cover if you decide to purchase a product.	Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract.
To assess the information you have provided and make a decision as to whether we can provide you with cover and at what price.	Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract.

Purpose of Processing	Legal Basis
To verify your identity and to verify the accuracy of the information we receive.	<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 for the purposes of our legitimate interests to investigate and prevent potential fraudulent activity.</p> <p>Processing is necessary to comply with legal obligations (e.g. money laundering requirements).</p>
To administer your insurance contract and make any changes during its term, answer queries, provide updates and process a cancellation.	Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract.
To make and receive any payments whether in relation to your policy or a claim.	Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract.
To manage and investigate any claims made by you or another person under your policy of insurance, or by you as a Third Party against our policyholder including for the defence of legal proceedings.	<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 for the purposes of our legitimate interests.</p>
To detect and prevent fraud, money laundering and other offences. To assist An Garda Síochána or any other authorised law enforcement body with their investigations.	<p>Processing is necessary for the purposes of our legitimate interests. This interest is to investigate and prevent potential fraudulent and other illegal activity.</p> <p>Processing is necessary to comply with legal obligations.</p>
To manage and investigate any complaints.	<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.</p>
For reinsurance purposes.	Processing is necessary for the purposes of our legitimate interests in protecting ourselves from excess losses due to high exposure.
To comply with laws and regulations.	Processing is necessary to comply with legal obligations.
For statistical analysis including internal risk assessment, portfolio performance reporting or market-level research exercises.	Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products and services.

Purpose of Processing	Legal Basis
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 processes, products and services.
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 in order to take steps at your request prior to entering into a contract.</p> <p>Processing is necessary to comply with legal obligations.</p> <p>Processing is necessary for the purposes of our legitimate interests.</p>
For direct marketing purposes.	Processing is based on your specific consent.
To issue service related communications to you such as policy renewal reminders or adverse weather alerts to help safeguard your property.	Processing is necessary for our legitimate business interests.
To administer and improve our website. To make suggestions and recommendations to you as a user of our website about products and services that may be of interest to you. For further information please see our <b>Cookie Policy</b> .	<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 (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 specific 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:

- It was given to us by someone who is applying for an insurance product on your behalf (your insurance broker intermediary, spouse or partner).
- It was supplied to us when you purchased, or sought to purchase, an insurance product or service that is provided by us in partnership with other companies.
- In the event of a claim or incident it was given to us by involved third parties or by witnesses to the incident.
- From experts or professionals during the claims process e.g. legal representatives, medical professionals, loss assessors, loss adjusters, accident and private investigators, motor repairers, motor engineers, car hire providers and salvage providers.
- It was lawfully collected from other sources such as the Integrated Information Data Service ('IIDS') which is a shared industry members database that, by arrangement with the Department of Transport, allows its users to confirm the accuracy of penalty point and no-claims discount provided by customers.
- Other vehicle history check suppliers/ databases.



- Through credit history checks.
- Through geocoding databases used to determine location-based risk factors.
- Searches of open source and publicly available information (e.g. social media platforms and on-line content, court judgements etc).
- The Insurance Link claims anti-fraud database (for more information see [www.inslink.ie](http://www.inslink.ie)) and from other insurance companies.
- Other fraud prevention databases and data enrichment services available in the insurance industry.
- Personal data collected through website cookies processing e.g. IP address.

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

We may share your details with other third parties (e.g. service providers, data processors, other data controllers) in order to administer your policy, handle and validate claims, to prevent and detect fraud, provide marketing and advertising services, comply with laws and regulations and to conduct internal or market level research analysis. For example, with:

- Your Intermediary & anyone authorised by you to act on your behalf.
- Our Third-Party Service Providers such as our Information Technology suppliers, Cloud Service Providers, data storage providers, payment services providers and documentation fulfilment providers.
- Other companies within the RSA Insurance Group.
- The Insurance Link claims anti-fraud database (for more info see [www.inslink.ie](http://www.inslink.ie)), with other insurance companies and with industry bodies such as Insurance Ireland.
- Loss adjusters, repairers, car hire providers, medical practitioners, solicitors and other firms as part of the claims handling process.
- Property and Risk Surveyors.
- Private Investigators and Claims Investigators when we need to further investigate certain claims.
- Other fraud prevention databases and data enrichment service providers available in the insurance industry.
- Prospective sellers or buyers in the event we decide to sell or buy any business or assets.
- Our reinsurers who provide reinsurance services to RSA Insurance.
- Third party claimants or their legal representatives during the administration of a claim being made against you.
- We may also share your personal information as a result of our legal and regulatory obligations or on order of a Court Order or Subpoena i.e. with law enforcement agencies and government departments including the Central Bank of Ireland, the Financial Services and Pensions Ombudsman, the Revenue Commissioners/ Inspector of Taxes, An Garda Síochána, the Criminal Assets Bureau, the Data Protection Commission.
- We add details of your motor policy to the Motor Third Party Liability Database ('MTPLD') and National Fleet Database ('NFD') maintained by the Motor Insurers Bureau of Ireland ('MIBI'), to comply with our legal obligations as set out under section 78A of the Road Traffic Act 1961 (as amended). For more information see [www.mibi.ie](http://www.mibi.ie)



- 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**.

Some of the organisations we share information with (including transfers within the RSA Group) may be located outside of the European Economic Area (EEA). We will only do this in compliance with the appropriate legal and technical safeguards such as the standard data protection clauses adopted by the European Commission, Binding Corporate Rules or as a result of an adequacy decision of the European Commission.

## 5. Profiling and automated decision making

We may conduct the following activities, which involve profiling and automated (computer based) decision-making:

- The use of Pricing and Underwriting engine and algorithms – these processes calculate the insurance risks based on the information that you have supplied or that we have collected about you. This will be used to determine if we can provide, or continue to provide, you with a policy and to calculate the premium you will have to pay.

The results of these processes may limit the products and services we are able to provide you. If you do not agree with the result, you have the right to request human intervention to allow you to express your point of view and contest the decision.

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

Information submitted to RSA for a quotation may be retained by us for a period of up to 15 months from the date of the quotation. Information in respect of a policy (to include claims on the policy) will be held for 8 years after the ending of the client/insurer relationship to ensure we meet our regulatory obligations. We will retain call recordings and emails for 8 years from the date of the communication.

There are certain policies that we need to keep information for longer than the normal periods, in the event we receive claims much later due to the claimant being unaware of the injuries until a long time after it was caused. We may also be required to retain information for longer than the outlined retention periods, where we have a regulatory obligation to do so.

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

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

- 1 To correct any information we hold about you if you believe it's incorrect or incomplete – please contact your intermediary or us directly to have this updated.
- 2 To request your personal information be deleted where you believe it is no longer required. Please note however, this request will not be valid while you are still insured with us and where we are subject to legal or regulatory obligations.
- 3 To be provided with a copy of the personal information we hold about you, in a commonly used electronic format (or hard copy if you wish).

- 4 To request that we provide/ transfer a copy of the personal information you have supplied to us, to another company. We would provide the information in a commonly used electronic format.
- 5 To request that we restrict the use of your personal information in certain circumstances.
- 6 To object to the processing of your personal data for marketing purposes or for any purpose where processing is necessary for the purposes of our legitimate interests (see table above).
- 7 To withdraw consent where we rely on your consent as our legal basis for using your personal data.
- 8 To contest decisions based solely on automated decision making, express your point of view and ask for human intervention.

Please note that requests to restrict the use of your personal information or to object to the processing of your personal data may lead to us being unable to continue to service your policy and therefore lead to cancellation of your policy.

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 the address contained in Section 9 of this notice. When you are making a request please provide us with your name, address, data of birth and any policy or claim IDs that you have. For any requests made you may need to provide us with a copy of your photo identification, for example to ensure that we do not disclose your personal information to anyone that is not entitled to it.

All requests are free of charge unless we think your request is manifestly unfounded or excessive in nature. We will endeavour to respond within one month from receipt of the 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 in our response. Please note that simply 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.

## 8. Changes to our Data Protection Notice

This notice may be updated from time to time so please check it each time you submit personal information to us or when you renew your insurance policy with us.

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

If you have any questions or comments about this notice please contact: The Data Protection Officer, RSA Insurance Ireland DAC, Dundrum Town Centre, Sandford Road, Dundrum, Dublin 16, D16 FC92. You may also email us at [ie\\_dataprotection@ie.rsagroup.com](mailto:ie_dataprotection@ie.rsagroup.com).

## 10. How can you raise a concern?

As a responsible Data Controller, we take our data protection obligations extremely seriously. However, if you are unhappy with how we have handled your personal data and wish to raise a concern about this, please contact us at [ie\\_dataprotection@ie.rsagroup.com](mailto:ie_dataprotection@ie.rsagroup.com) or write to us using the address provided in Section 9. Our Data Protection Officer will investigate your concern and will give you additional information about how it will be handled. We aim to respond in a reasonable time, normally within 30 days. If you are not satisfied with our response you can raise your concern with the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28 Ireland or visit [www.dataprotection.ie](http://www.dataprotection.ie).