

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 in accordance with data protection law.

1. Who are we?

In this Notice references to “we” “us” “our” mean RSA Insurance Ireland DAC (‘RSA’), a subsidiary of Intact Financial Corporation (‘Intact’). 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.

Representatives

The General Data Protection Regulation (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 GDPR, for example offering products or services to EU citizens.

Intact may undertake processing activities to which the GDPR applies, and as they do not 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. 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.

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 (to the extent this applies) relating to our processing of your personal data in line with the UK GDPR and/or with this 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.

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 : name, address, date of birth, occupation, policy numbers, contact details, gender, driving licence details and penalty points information, vehicle registration number, 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, and our partners, 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.

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 and this may be done via your intermediary (if applicable), through our/their website, by email, SMS, telephone calls and/ or by post. Telephone calls with RSA may be recorded for quality assurance, training, verification and security purposes.

If you need to claim under your insurance policy, or if you are making a claim against an RSA policyholder, 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 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 law requires us to meet certain conditions before we use your personal information in the manner described in this Notice. To provide you with this information we have prepared the following which describes the purposes for which we may use 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.
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 potentially fraudulent activity.</p>

	Processing is necessary to comply with legal obligations (e.g., anti-money laundering requirements).
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.	Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract. Processing is necessary for the purposes of our legitimate interests.
If you have opted for a telematics motor insurance product, data collected via the 'black box' smart sensor installed in your car may be used to evidence what happened in a claim incident.	Processing is necessary for the purposes of our legitimate interests.
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.	Processing is necessary for the purposes of our legitimate interests. This interest is to investigate and prevent potential fraudulent and other illegal activity. Processing is necessary to comply with legal obligations.
To manage and investigate any complaints.	Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract. Processing is necessary to comply with legal obligations.
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.
For quality assurance, training, records maintenance, security and verification purposes, for example the recording or live monitoring of telephone calls.	Processing is necessary for the purposes of our legitimate interests. Processing is necessary to comply with legal obligations.

<p>For the ongoing development, testing and security of our IT systems; to make back-ups of data in case of emergencies and for disaster recovery/ business continuity purposes.</p>	<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>
<p>For direct marketing purposes.</p>	<p>Processing is based on your specific consent.</p>
<p>To issue service-related communications to you such as policy renewal reminders, new website and customer service features or adverse weather alerts to help safeguard your property.</p>	<p>Processing is necessary for our legitimate interests.</p>
<p>To administer our website.</p> <p>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 Cookie Policy.</p>	<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 information provided by customers.
- From other vehicle history check suppliers/ databases.
- Through credit history checks.
- Through geocoding databases used to determine location-based risk factors.
- From searches of open source and publicly available information (e.g., social media platforms and on-line content, court judgements etc).
- From the Insurance Link claims anti-fraud database (for more information see www.inslink.ie), from insurance companies and from other fraud prevention databases/ 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) 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 Intact Group.
- The Insurance Link claims anti-fraud database (for more info see 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.
- Reinsurers (and brokers of reinsurers) who provide reinsurance services to RSA.
- 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
- The Personal Injuries Assessment Board (PIAB), Ireland's independent state body which assesses personal injury compensation.
- 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](#).

Sometimes the organisations we share information with (including transfers within the Intact Group) may be located outside of the European Economic Area (EEA). We will only do this by reliance on an approved "transfer mechanism" such as the European Commission adopted Standard Contractual Clauses ('SCCs'), use of 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 engines and algorithms – these processes calculate the insurance risks based on the information 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 use of Telematics/ Smart Sensor data analytics – where you have opted for an insurance product that collects information using smart sensors (e.g., in-car "black box") and this is used to calculate your insurance risk (driving score) and/or mileage scores.

The results of these processes may determine if we can provide, or continue to provide, you with a policy and/or calculate the premium you have to pay. 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, to obtain an explanation of the decision reached and contest the decision.

6. For how long will RSA keep your information?

In general, we will retain your personal information for a period of 7 years from the date of cancellation of your contract of insurance or the closure/settlement of your claim. Quote information is retained for 15 months. There may be reasons why we need to retain your personal information for longer periods, for example in the case of employer's liability insurance and subsidence matters, or to comply with our legal and regulatory obligations.

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

You have certain legal rights under data protection law 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 actionable while you are still insured with us, where we are subject to legal or regulatory obligations, or for our valid legitimate business interests.
- 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 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, date 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 other 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, Sandyford Road, Dundrum, Dublin 16, D16 FC92. You may also email us at 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 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.