

DATA PROTECTION NOTICE

- REPUBLIC OF IRELAND



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1. INTRODUCTION

You are receiving this Data Protection Notice because your privacy is important to IPB Insurance (IPB) and we are committed to protecting your personal information. We want to inform you about the ways that we collect and use your information and about the rights that you have. IPB adheres to the requirements of the Data Protection Acts 1988 to 2018 and the General Data Protection Regulation.

2. WHO WE ARE AND HOW YOU CAN CONTACT US

IPB is a wholly owned Irish company which specialises in insurance. More information about our products can be found on our website www.ipb.ie.

We have appointed a Data Protection Officer who oversees data protection and can answer any questions you have.

Contact details:

Data Protection Officer,
IPB Insurance,
1 Grand Canal Square,
Grand Canal Harbour,
Dublin D02 P820

Phone: +353 1639 6642

Email: dpo@ipb.ie

3. COLLECTING INFORMATION

We will collect different kinds of information, depending on the kind of insurance we are being asked to provide, and the type of claim we are being asked to pay.

Taking out a policy: In order to provide insurance cover for you or your property, we will need accurate and up-to-date information about the people and property to be covered by the policy.

If you give us information about another person: Before giving us any information about another person (e.g. a named driver on your car insurance, a passenger or witness), please make sure they know you are giving us their information and they have agreed to do so. You should also show them this Data Protection Notice.

Making a claim: We will need accurate and up-to-date information if (a) you are making a claim under your own policy or (b) you are a third party who is making a claim under a policy held by one of our policyholders.

Some of this information will be provided directly by you to IPB and some information will be provided to us by other parties.

Here are some examples of the kinds of information we need, in order to provide insurance or to pay a claim:

TYPE OF DATA	EXAMPLES OF DATA
Basic personal information	<ul style="list-style-type: none">Name, postal address, eircode, date of birth, telephone numbers and email addressMembership of affinity programme <p>This information is required to identify and correspond with you.</p>
Information necessary to receive a quote and to pay for insurance cover	<ul style="list-style-type: none">Policy number, client reference number, occupation, gender and payment detailsClaims history (date, type, details and value)Unspent convictionsPolicy information (e.g. renewal date and details of cover)Details of previous insurerImages and surveys relating to the insurance policyDetails regarding insurance eligibility criteria <p>Other types of information required will vary, depending on the type of insurance:</p> <ul style="list-style-type: none">Private motor: Vehicle details, driver details, named driver details, driving licence details, penalty points etc.Home insurance: Property details, occupancy details etc., interested party details including name, nature of financial interest, value, and timescale. <p>We need this information in order to determine the cost of your insurance and to assess your application.</p>
Customer care information	<ul style="list-style-type: none">Correspondence with you during the term of your insurance, including notes made of phone callsRecords of payments and arrearsCustomer feedback, including any complaintsActivity on your account (e.g. payments made, requests to change the level of cover provided, queries received, complaints made and insurance expiry date) <p>This information is required so that we can actively manage your account, communicate with you and respond to queries.</p>

TYPE OF DATA	EXAMPLES OF DATA
Claims information	<ul style="list-style-type: none"> Policy number, claim number, accident circumstances, claimant details (e.g. full name, address, date of birth, contact number), claimant's representative, witnesses, details of passengers, CCTV footage, criminal convictions and VAT status <p>Other types of information required will vary, depending on the type of claim you are making. For example:</p> <ul style="list-style-type: none"> For personal injury claims: <ul style="list-style-type: none"> Details of injury, health information, medical history and any pre-existing or subsequent conditions, PPS number of claimant For material damage claims: <ul style="list-style-type: none"> Details of estimate, photographs, invoice Geolocation data may be used to verify an accident location in limited circumstances For financial loss claims <ul style="list-style-type: none"> Details of any costs (e.g. car hire, medical bills and expenses) <p>We need this information to assess and investigate your claim.</p>
Health and criminal information	<p>As an insurer, we may receive information regarding your health, where it is necessary for the purpose of assessing your insurance application, or as part of a claim to assess your level of physical or mental injury.</p> <p>Details of criminal and medical history may also be obtained by IPB for the purpose of defending a claim made.</p>
Cookies	<p>Our website uses cookies. Cookies are small files that websites place on the device you are using to browse the site. The cookie allows the website to "remember" your actions or preferences over time. They help IPB to make the website function better for you.</p>

4. COLLECTING INFORMATION FROM OTHER SOURCES

Publicly available information

We may collect and use information about you which is publicly available.

This type of information could be obtained from sources such as social media profiles, online forums such as Facebook, YouTube, Twitter and other websites. We may use these websites to validate the information you provided to us.

Information received about you from another person associated with your account

If you appoint another person to deal with your insurance account or your claim, we will receive information about you from them. We will also share your information with them. For example, an insurance broker, a solicitor, a company's authorised representative, another person named on the insurance policy, a representative you nominate to handle a claim, or someone else who has authority to act on your behalf.

Claims and Underwriting Exchange (CUE) databases administered by CRIF Decision Solutions to assist in detection, investigation and prevention of fraud.

In addition, if you have a personal injury claim we may share your details via CRIF to Compensation Recovery Unit (CRU) to obtain a CRU certificate and combat fraud.

Insurance Link (operated by Verisk)

The Verisk Insurance Link database helps insurers and the self-insured in the identification of non-disclosure, detection and defence of fraudulent or exaggerated claims, and it should be

noted that such claims may result in prosecutions for fraud.

The database contains details of insurance claims made by individuals. This database can be used by IPB when we are assessing your insurance application or assessing a claim made. If we identify that you have made a previous claim which was not disclosed to IPB, we may, depending on circumstances, use this to refuse or defend the claim, or cancel your insurance policy. We also share a limited amount of your information with Insurance Link, which they may pass to another insurer, self-insurer or statutory authority. This information includes the claimant's name, address and date of birth and the type of injury or loss suffered. In a case where we find any prior claims on Insurance Link, we may contact the relevant insurance company and request additional defined details from them. We may also share certain information to another insurer if we receive a request. We will also share certain personal information with Verisk to carry out analysis of the data for fraud prevention. The sharing of information with Insurance Link is subject to protocols agreed with the Data Protection Commission. More information about Insurance Link can be found at www.inslink.ie

5. IF YOU DO NOT PROVIDE THE INFORMATION REQUESTED

If you do not provide sufficient information, we may be unable to provide insurance. If you are making a claim, failing to provide

information may delay the processing of your claim or may prevent us from processing your claim.

Providing false information may mean that a claim made by you under the policy will not be paid and may possibly result in a criminal prosecution for fraud.

6. WHY DOES IPB COLLECT AND USE (PROCESS) YOUR INFORMATION?

We are not allowed to process your data unless we have a legal basis for doing so. The legal bases for processing of personal data by IPB are as follows: (a) the performance of an insurance contract (b) legal obligations which apply to IPB (c) claims investigation, and (d) the legitimate interest of IPB and (e) consent of the data subject.

(a) Insurance contract

If you are a third party (i.e. you do not hold an insurance contract directly with IPB) and you are making an insurance claim against a policy held by one of our policyholders, this section is not relevant to you.

If you are a policyholder, we have an insurance contract directly with you. Therefore, we need to use your information in order to:

- Provide insurance and facilitate policy cover and to process claims
- Process and assess insurance application(s)
- Administer accounts and verify the information provided
- Perform accounting and other record-keeping functions

- Process payments that are paid to you or by you
- Contact you in connection with your insurance policy
- Recover debts you owe us

(b) Legal obligations

As an insurer, IPB needs to adhere to many different legal obligations. Some of these obligations are to:

- Verify your identity and perform checks for the purpose of preventing and detecting crime and to comply with laws relating to money laundering, fraud, terrorist financing, and international sanctions
- Gather and retain sufficient information to assess your insurance needs
- Assess whether the insurance policy is suitable for you
- Manage, investigate and pay any claim
- Retain sufficient records in relation to your account
- Provide you with information required under regulatory requirements
- Provide returns to regulators such as the Central Bank of Ireland and Revenue (and respond to requests and queries from regulators)
- Comply with requests from law enforcement agencies (which may include sharing information with these agencies)
- Comply with court orders
- Investigate and resolve complaints
- Perform general, financial and regulatory accounting and reporting
- Liaise with the Personal Injuries Assessment Board

- Provide data required by any government or regulatory bodies or agency (e.g. providing details to the Department of Transport of who we insure)
- Provide staff training and quality assurance

(c) Claims investigation

IPB has a requirement to process personal data and, in certain circumstances, data regarding physical or mental health for claims notification, investigation and resolution purposes. This includes legal advice and the institution of legal proceedings (or potential legal proceedings) in situations where the processing is necessary for the establishment, exercise or defence of legal claims.

(d) Legitimate interest of IPB

We need to process your information in the day-to-day running of our business to ensure that our systems operate effectively. In doing so, we ensure that the impact of the processing on your information is minimised and that there is a fair balance between your data protection rights and the activities of IPB. Examples of situations where IPB uses your data for this reason are to:

- Carry out statistical analysis and the review and enhancement of our products, services and website, including notifying members of risk conferences
- Carry out policyholder satisfaction surveys
- Ensure appropriate fraud protections are in place
- Investigate potentially fraudulent activities

- Perform IT system testing and software code testing
- Ensure business continuity and disaster recovery
- Obtain reinsurance

(e) Consent

If your claim is processed through our online portal, you will be asked to consent to the use of your geolocation data related to the accident location. This information will only be used in relation to this claim and not for any other purpose.

7. SHARING INFORMATION WITH OUR TRUSTED PARTNERS

IPB may disclose your information with trusted service partners who we use, following careful consideration and in accordance with our internal selection criteria. IPB partners will vary from time to time and examples include:

- Data storage (both paper and electronic records)
- IT and IT security
- Market research
- Reinsurers, brokers and other insurance companies
- Other potential parties in the event IPB chooses to buy or sell its business or assets
- Expert advisors such as accountants, auditors, solicitors, barristers, legal cost accountants, actuaries and arbitrators
- Typists
- Any business partners that provide a service which is related to part of

the policy cover (e.g. Breakdown Assistance under motor policies)

If you make a claim

If you make a claim, we may share your information with the following additional parties:

- Private investigators (under an appropriate confidentiality agreement) when we need to investigate a claim
- Expert witnesses such as liability and motor assessors, medical experts, loss adjusters, and engineers
- Subject matter experts such as, but not limited to: accountant, actuary, architect, collision engineer, consulting engineer, coroner, environmental engineer, environmental clean-up specialist, equine experts, forensic fire engineer, farm experts, medical experts (e.g. audiologist, chiropractor, cognitive behaviours therapist, geneticist, gynaecologist, maxillofacial surgeon, neonatologist, neurologist, neuropsychologist, neurosurgeon, obstetrician, occupational therapist, ophthalmologist, orthopaedic surgeon, paediatrician, pain specialist, physiotherapist, plastic surgeon, psychologist, prosthetic/orthotic consultant, speech and language therapist, vocational therapist), metallurgist, meteorologist, quantity surveyor, stenographer, structural engineer
- Co-defendant – other parties who may be responsible for the accident

- Open Source Intelligence Services supplier to perform research and gather information from different data sources that are all in the public domain
- The Motor Third Party Liability Database maintained by the Motor Insurers Bureau of Ireland (MIBI). MIBI will make this information available to the Minister for Transport, Tourism and Sport and An Garda Síochána for the purposes of section 78A of the Road Traffic Act 1961 (as amended). MIBI may also use this information to:
 1. comply with its own legal obligations (e.g. to provide information to members of the public who were involved in an accident with an unidentified driver pursuant to regulation 5(5) of SI 651/2003 (as amended)); and
 2. for the performance of its obligations pursuant to the agreement with the Minister for Transport dated 29 January 2009 (as amended from time to time) which was entered into to provide compensation to individuals involved in accidents with uninsured drivers.

More details can be found on the MIBI data protection [webpage](#).

If you are a third party (i.e. you do not hold an insurance contract directly with IPB) and you are making an insurance claim against a policy held by one of our policyholders, we will share certain information with our policyholder, who is the person insured.

8. YOUR RIGHTS

You have rights under data protection law, including the right to object. This section explains what these rights are and how you can exercise them.

YOUR RIGHTS	DESCRIPTION
Right of access	You can get a copy of the personal information we have about you, as well as other information about IPB's processing of your data.
Right to rectification (errors)	You can request that any inaccurate information we hold about you is corrected. If we have incomplete information, you can ask that we update the information we hold on file.
Right to be forgotten (erasure)	You have a right to have your information erased in certain circumstances. For example, if you previously provided IPB with consent and you are now withdrawing it and there is no other legal reason for IPB to use your data.
Right to object	<p>You may object to IPB's activities listed in this notice. Your right to object to this process is subject to certain exemptions.</p> <p>You have the right to object to automated decision-making and/or profiling. Please note that IPB does not currently engage in this type of activity.</p> <p>You have the right to object to IPB using your personal information for direct marketing purposes. Please note that IPB does not currently engage in this type of activity.</p>
Right to complain to supervisory authority (complaints)	You have the right to complain to the Data Protection Commission. See page 11 for details.
Right to restrict processing (withdrawal of consent)	Whenever you have provided IPB with consent, you can withdraw your consent. If you withdraw consent, it will not affect the lawfulness of processing that is based on your consent before you withdrew it.
Right to data portability	You have the right, in certain circumstances, to transfer your personal information to another organisation.

Please note:

- Your ability to exercise these rights may be subject to certain restrictions as set out in the legislation and the GDPR.
- If you exercise some of your rights (e.g. erasure), this may have an impact on the service and products we can provide to you.

If you wish to exercise your rights, please notify us in writing at the postal or email address on page 2 of this notice. Please provide us with sufficient information so that we can respond to your request (e.g. your name, address and any reference number you may have). We may ask you to verify your identity so that we can accurately respond to your request.

Once we have confirmed your identity, we will respond to your request within one month in most instances. This timeframe may be extended by a further two months in certain instances and if this is the case, we will inform you of the reasons an extension is required.

9. HOW LONG WE RETAIN YOUR INFORMATION

As an insurer, IPB adheres to different pieces of legislation, some of which require that we keep your information for differing periods of time. We have determined the appropriate period of time, taking into account our

regulatory requirements, the legal basis to process your information, our legitimate interests, the type of insurance provided and the purpose we hold the information.

Generally speaking, we will hold your information for the periods set out below:

Quote details:

- 12 months from the proposed start date of your insurance cover

Policy details:

- where it involves the policyholder only, 6 years from the end of the insurance policy (subject to any longer period that may be required under Claims details below)
- where it involves third party liability, 21 years from the end of the insurance policy (subject to any longer period that may be required under Claims details below)

Claims details:

- 10 years from when a claim is finalised or if the claim involves a minor and the claim is not settled we will hold the data for 3 years from the date the minor reaches 18 years of age

We keep personal data for longer than the above periods for IT system back-up purposes and for disaster recovery. This information is kept separate from our live system and is not accessed on a day-to-day basis by IPB staff.

10. TRANSFER OF YOUR INFORMATION ABROAD

Your information may be transferred outside of the European Economic Area. To ensure your rights are protected, we only do so provided that the other country has laws that adequately protect your information or where we have taken steps to ensure that the recipient will protect your information to the same standard as we are legally required to.

11. CONFIDENTIALITY AND SECURITY

IPB uses internal technical and organisational measures to protect your information from unauthorised access, to maintain data accuracy and to help ensure the appropriate use of your personal information. These security measures include strong encryption of your personal information in transmission and in storage, firewalls, antivirus protection as well as physical protection of facilities where your personal information is stored and background checks for personnel that access physical facilities.

The IPB Insurance Information Security Management Framework complies with the requirements of ISO27001:2013 and with ISO27701, which is a privacy extension of IPB's ISO27001 Certification and outlines a framework for Personally Identifiable information (PII) Controllers to manage privacy controls.

12. COMPLAINTS

If you have any questions or are dissatisfied with the way that your personal information has been treated, please notify the Data Protection Officer, who will investigate the matter for you and try to resolve it. Contact details are on page 2 of this notice.

If you remain dissatisfied, you have a right to complain to the Data Protection Commission.

Contact details:

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

Local: 1890 252 231

Email: info@dataprotection.ie

13. UPDATES TO THIS NOTICE

We may amend the Notice from time to time. The most up-to-date version is available on www.ipb.ie and takes effect on the date that it is updated.

