

# DATA PROTECTION NOTICE

## - IPB INSURANCE CANDIDATES



Information on how IPB Insurance collects and uses personal information

Last updated May 2024

### 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.

This Data Protection Notice is being given to you because you are applying for a position of employment with IPB. It is a specific data protection notice for candidates and is separate from IPB's employee Data Protection Notice. This document only applies to your information that is obtained as part of the HR application process.

In the event you are successful and you accept an offer from IPB, you will be provided with IPB's employee Data Protection Notice which will then apply to you.

### 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](http://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 664

**Email:** [dpo@ipb.ie](mailto:dpo@ipb.ie)

### 3. COLLECTING INFORMATION

IPB holds information about its candidates for the purposes of evaluating your employment application.

We may seek different types of information from different candidates. This will depend on the kind of role you are applying for, and have particular reference to whether your role will be within scope of the Central Bank's Fitness and Probity, Individual Accountability, and/or Minimum Competency regimes. Some of this information will be provided directly by you to IPB and some information will be provided to us by other parties.

You need to provide us with accurate and up-to-date information if we are to assess your application for employment with IPB. Your information will be stored in our recruitment system.

As your prospective employer, IPB needs to collect, store and use (process) HR information. Some examples of information we collect are listed in this notice.

### INFORMATION THAT IPB MAY COLLECT

TYPE OF DATA	EXAMPLES OF DATA
<b>Basic personal information</b>	Name, postal address, eircode, date of birth, telephone numbers and email address. This information is required to identify and correspond with you.
<b>HR information</b>	CV, interview notes, references and communications regarding arranging an interview.
<b>CCTV</b>	We use CCTV to monitor and collect images in the reception area. We have a strict retention period for security camera images but in certain limited circumstances, the recordings may be kept for longer (e.g. to provide evidence to the Gardaí for investigations into fraud or for criminal proceedings).

### 4. COLLECTING AND EXCHANGING INFORMATION FROM OTHER SOURCES

Personal data is normally obtained directly from you.

If you have applied for a role via a recruitment agency, we will collect information from the agency and share information with them. Similarly if you have applied for a role via Irish Jobs or an employee referral, we will collect information from these sources.

Prior to a formal offer of employment, we will engage a third-party service provider to undertake standardised pre-employment checks and they will liaise directly with you and IPB in this regard.

### 5. IF YOU DO NOT PROVIDE THE INFORMATION REQUESTED

If you do not provide sufficient information, we may be unable to consider your employment application.

### 6. WHY DOES IPB COLLECT AND USE YOUR INFORMATION?

#### (a) Before you enter into an employment contract

As your prospective employer, IPB needs to process and assess your employment application(s).

#### (b) Legal obligations

As an insurer, IPB needs to adhere to different legal obligations (e.g. employment law requirements such as the Employment Equality Acts and the Workplace Relations Act).

#### (c) Our legitimate interest

IPB maintains CCTV surveillance in the reception area for the purposes of security and safety. 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 legitimate interests and activities of IPB.

### 7. CONFIDENTIALITY

We recognise the need for utmost confidentiality with regard to processing candidates' information. Within IPB your data can be accessed by the following people:

- The HR Department
- The hiring manager and senior management in the department to which your application relates.

## 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
<b>Right of access</b>	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.
<b>Right to rectification (errors)</b>	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.
<b>Right to be forgotten (erasure)</b>	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.
<b>Right to object</b>	<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 IPB using your personal information for direct marketing purposes. Please note that IPB does not currently engage in this type of activity.</p>
<b>Right to complain to supervisory authority (complaints)</b>	You have the right to complain to the Data Protection Commission. See 12. 'Complaints', for details.
<b>Right to restrict processing (withdrawal of consent)</b>	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 was based on your consent before you withdrew it.
<b>Right to data portability</b>	You have the right, in certain circumstances, to transfer your personal information to another organisation.
<b>Right not to be subject to automated decision making including profiling</b>	<p>You have the right not to be subject to a decision based solely on automated processing that has an impact on your legal rights or similarly significantly affects you.</p> <p>However, there are circumstances when we use automated decision making and they are set out further at 11. 'Automated Decision Making'.</p>

### 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 your application.

If you wish to exercise your rights, please notify us in writing at the postal or email address at 2. 'Who are we and how can you contact us' section of this notice. Please provide us with sufficient information so that we can respond to your request (e.g. your name, address and the role you applied for). We may ask you to verify your identity so that we can accurately respond to your request.

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

## 9. TRANSFER OF YOUR INFORMATION ABROAD

Your information may be transferred outside the European Economic Area. To ensure your rights are protected, we only transfer your information in the following circumstances: (a) where the other country has laws that adequately protect your information, or (b) where we have contractually obliged the recipient to protect your information to the same standard that we are legally required to.

## 10. HOW LONG WE RETAIN YOUR INFORMATION

As your potential employer, IPB needs to adhere to different pieces of legislation, some of which require that we retain your information for differing periods of time. We have determined the appropriate retention period, taking into account our regulatory requirements, the legal basis to process your information, our legitimate interests and the purposes for which we hold the information.

Generally speaking, we will hold your information for one year after your application. If you accept a job offer, your information will be held for longer and you will be notified about this in the IPB employee Data Protection Notice. We keep personal data for longer than one year 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.

## 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. AUTOMATED DECISION-MAKING

Automated decision making is a function of the recruitment system that IPB uses to pre-screen candidate CVs before submission to IPB. Automated decision making is a process whereby important decisions of a legal nature that may affect you are made. This process enables IPB to deliver decisions on recruitment more comprehensively and within a shorter time-frame. If you would like to learn more about this process you can contact the Data Protection Officer using the contact details at 2. 'Who are we and how can you contact us'.

## 13. COMPLAINTS

If you have any questions or are dissatisfied with the manner 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 at 2. 'Who are we and how can you contact us' section 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  
Dublin D02 RD28

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

