

## 123.ie Data Protection Statement (Car, Home and Travel Insurance)

We are committed to ensuring that your data is protected. To keep you informed, we have created this statement 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?**

123 Money Limited, trading as 123.ie is a wholly owned subsidiary of RSA Insurance Ireland DAC (RSA Insurance). Both 123.ie and RSA Insurance (referred to throughout this statement as 'we' 'us' 'our') are the data controllers in relation to the personal information we hold about you.

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

We 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 data for other related matters such as complaint handling, prevention or detection of fraud, validating claims, reinsurance and statistical analysis. In addition, if you have given us separate marketing consent, we will use your personal data for direct marketing purposes.

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 covered (e.g. car make and model, your home, details about you). When buying certain products, we will on occasion need to collect special categories of data (e.g. medical history) and convictions history. If you can't provide this information, we will be unable to provide our products to you.

In order to provide our products, we will need to process your payment information (e.g. bank account details, credit and debit card details) to collect payments from you and to issue any refunds to you.

We may contact you if you request a quote from us and/or to service your policy via our website, emails, SMS, Apps, phone calls and/or post. Phone calls 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 data). If you have the 123GO car insurance product, data collected via the black box will be used to evidence what happened.

When submitting an application to us for a product, you may provide us with information relating to other persons named under the policy, (e.g. a named driver). You agree that you will bring this Data Protection Statement to the attention of each person named on the policy at the earliest possible opportunity. Please also ensure that anyone else who is insured under your policy have agreed to provide their personal information to us. For those with the 123Go car insurance product, you should let all drivers of your car know about the black box fitted to your vehicle that collects data about how your car is driven.

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

<b>Purpose</b>	<b>Legal Basis</b>
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 and 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 and 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.	Processing is necessary for the performance of a contract and in order to take steps at your request prior to entering into a contract. Also for the purposes of our legitimate interests to investigate and prevent potential fraudulent activity. To comply with legal obligations (e.g. 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;

To make and receive any payments whether in relation to your policy or a claim.	Processing is necessary for the performance of a contract;
To manage, validate and investigate any claims made by you or another person under your policy.	Processing is necessary for the performance of a contract;
To detect and prevent fraud, money laundering and other offences. To assist An Garda Síochána or any other authorised body with investigations.	Processing is necessary for the purposes of our legitimate interests 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 and 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 performance of a contract and 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 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 staff training, performance reviews and discipline	Processing is necessary for compliance with our legal obligations. Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products and services;
To make back-ups of your data in case of emergencies and for disaster recovery purposes	Processing is necessary for the performance of a contract and to comply with legal obligations;
For direct marketing purposes	Processing is based on your specific consent.

### 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 companies. For example:

- It was given to us by someone who is applying for an insurance product on your behalf (e.g. a spouse).
- It was lawfully collected from other sources (e.g. the Integrated Information Data System ('IIDS')) to validate information you have submitted to us such as driver number and penalty points.
- Vehicle history check suppliers/databases.
- GPS and other technologies collected driving behaviour data via the 123Go black box fitted to your car.
- Through a database to determine address based risk factors (known as geocoding)
- Searches of publicly available information (e.g. online).
- The Insurance Link Anti-Fraud register (for more information see [www.inslink.ie](http://www.inslink.ie)) and other insurers.
- Other fraud prevention databases available in the insurance industry.

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

We may share your details with a number of external parties in order to administer your policy, handle and validate claims, prevent and detect fraud, provide marketing services, and conduct internal or market level research analysis. For example:

- Anyone authorised by you to act on your behalf.
- Our Third Party Service Providers such as technology suppliers, storage providers, payment providers and document providers.
- Other companies within the RSA Insurance Group.
- The Insurance Link Anti-Fraud register (for more info see [www.inslink.ie](http://www.inslink.ie)) and other insurance companies.
- Loss Adjusters, claims investigators, repairers, medical practitioners, solicitors and other firms as part of the claims handling process.
- Private Investigators when we need to further investigate certain claims.
- Surveyors.
- Other fraud prevention databases available in the insurance industry.
- Our reinsurers.

We may also share your personal information that we hold as a result of our legal and regulatory obligations. This can include An Garda Síochána, other official agencies and on foot of a Court Order or Subpoena.

In order to provide you with our products and services, some of your personal information may be shared with our service providers, which may include parties outside of the European Economic Area (EEA). We would 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. Direct Marketing**

If you have provided us with marketing consent, 123.ie will use your Personal Information for the purpose of offering you other products and services including customer discounts and rewards, which may be of interest to you. This information may be provided to you by post, SMS, phone and/or email.

You can withdraw your consent for direct marketing at any time by emailing [123dataprotection@123.ie](mailto:123dataprotection@123.ie), phoning us or by using the unsubscribe option facility provided on marketing SMS and email communications.

## **6. Which decisions made about you will be automated?**

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

**Pricing and Underwriting** – the process calculates the insurance risks based on the information that you have supplied or that we have collected about your policy. This will be used to determine if we can provide you with a policy and to calculate the premium you will have to pay.

**123Go Driver Score** – the process calculates your driving score based on the information captured via the black box installed in your car about each journey taken in your car. This will also be used to determine if we can provide you with a policy and to calculate the premium you will have to pay. This includes data about:

- Speed – driving within the safe speed limit!
- Smoothness – how hard you accelerate, brake and corner
- And Usage – how much driving you do at night, the number of journeys and if you are driving for long periods without a break

**Direct Marketing** – we will use profiling exercises to help us determine what products and services might be of interest to you.

The results of these automated decision-making processes will limit the products and services we may be 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.

## **7. For how long will we keep your information?**

Information submitted for a quotation will be retained by us for a period of up to 15 months from the date of the quotation. All 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.

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

We understand your information is important to you, therefore you have the following rights:

- 1 Correct any information we hold about you if you think it's incorrect or incomplete – please contact 123.ie directly.
- 2 Request your personal information to 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 need to retain your personal data to meet legal or regulatory obligations.
- 3 Provide you with a copy of the personal information we hold about you, in a commonly used electronic format (or hard copy if you wish).
- 4 Request that we supply 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 Request that we restrict the use of your information by us.
- 6 Object to the processing of your data for marketing purposes or for any purpose where processing is necessary for the purposes of our legitimate interests (see table above).

Requests to restrict the use of your information or to object to the processing of your 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, please email us at [123dataprotection@123.ie](mailto:123dataprotection@123.ie) or write to us at the address contained in Section 10 of this statement. When you are making the request please provide us with your name, address, date of birth and any policy IDs that you have. For any requests under 3 and 4 above, you will 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 of charge. We endeavour to respond within one month from receipt of the request. If we do not meet this time frame, we will 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 – we are often bound by legal and legislative law which can prevent us fulfilling some requests in their entirety, but when this is the case, we will explain this to you in our response.

**9. Changes to our Data Protection Statement.**

This statement will be updated from time to time so please check it each time you submit personal information to us or renew your insurance policy.

**10. How do you ask a question about this Data Protection Statement?**

If you have any questions or comments about this statement please contact:

The Data Protection Officer, 123.ie, RSA House, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16, D16 FC92. You may also email us at [123dataprotection@123.ie](mailto:123dataprotection@123.ie)

**11. How can you lodge a complaint?**

If you wish to raise a complaint on how we have handled your personal information, please send an email to [123dataprotection@123.ie](mailto:123dataprotection@123.ie) or write to us using the address provided in Section 10. Our Data Protection Officer will investigate your complaint and will give you additional information about how it will be handled. We aim to respond in a reasonable timeframe, normally 30 days. If you are not satisfied with our response you can lodge a complaint to the Data Protection Commission, Canal House, Station Road, Portarlington, Co Laois, R32 AP23.

**123 Money Ltd. trading as 123.ie is regulated by the Central Bank of Ireland.**