

## **123.ie Data Protection Notice (Motor, Home and Travel Insurance)**

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At 123.ie 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?**

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 notice as 'we' 'us' 'our') are Data Controllers in relation to the personal information we hold about you. We also provide insurance services in partnership with other companies.

### **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.

We 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, validating claims, 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 to you.

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

We may need to contact you if you request a quote from us and/or to service your policy. This will be done via our website, email, SMS, mobile Apps, telephone calls and/or by post. Telephone calls may be recorded for training and verification purposes.

Where you have opted for certain motor products which involves GPS vehicle tracking we will collect and process information from the smart sensor installed in your car including geo-location, driving behaviour and/or kilometer usage data ('telematics' data).

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). If you have opted for our 123GO motor insurance product, data collected via the 'black box' smart sensor installed in your car may be used to evidence what happened in the incident.

When submitting an application to us for an insurance policy, you may need to 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 Notice to the attention of each person named on the policy at the earliest possible opportunity. Please also ensure that anyone who is insured under your policy has agreed to provide their personal information to us. For those customers who have taken out a telematics-based motor product, you should let all drivers of your car know about the black box or smart sensor fitted to your vehicle that collects information about where and/or how your car is driven.

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 or use one of our mobile Apps. These tools are used by 123.ie and our third-party service providers to help improve our and their products and services, the functionality and performance of our websites and Apps, 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 table which describes the purposes for which we are using your personal data and the legal basis for doing so.

<b>Purpose of Processing</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 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 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, validate and investigate any claims made by you or another person under your policy, 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 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.

For staff training, performance reviews and internal disciplinary purposes.	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 ensure the security of our systems, 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 or in order to take steps at your request prior to entering into a contract.  Processing is necessary to comply with legal obligations.  Processing is necessary for the purposes of our legitimate interests.
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 services that may be of interest to you. For further information please see our <a href="#">Cookie Policy</a> .	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).  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 sources. For example:

- It was given to us by someone who is applying for an insurance product on your behalf (e.g. a 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 adjustors, 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.
- Other vehicle history check suppliers/databases.
- By using GPS vehicle tracking smart sensor technologies to collect driving behaviour, geo-location and/or kilometre usage data ('telematics') where you have chosen certain motor products.
- 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).
- 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 we 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, 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:

- Your agents and anyone authorised by you to act on your behalf.
- Our Third-Party Service Providers such as our Information Technology (IT) suppliers, Cloud Service Providers, data storage providers, payment services providers, documentation fulfilment providers and our marketing agencies e.g. who manage our customer loyalty programs.
- 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, claims investigators, repairers, car hire providers, medical practitioners, solicitors and other firms as part of the claims handling process.
- Private Investigators when we need to further investigate certain claims.
- Property and Risk Surveyors.
- Other fraud prevention databases and data enrichment service providers available to the insurance industry.
- 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.
- 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, or on foot of a Court Order or Subpoena.
- We add details of your motor policy to the Motor Third Party Liability Database ('MTPLD') 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 website 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. 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 and communicated to you by post, SMS, telephone and/or email.

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

## 6. Which decisions about you will be based solely on automated means?

We may conduct the following activities, which involve 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.
- The use of **Telematics** – the process involves the utilisation of smart sensor ('telematics') data to calculate your driving behaviour and/or mileage scores based on the information captured via the smart sensor installed in your car, where you have opted for such a product with us.

These processes 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 automated decision-making processes may limit the products and services that we can provide to 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, to obtain an explanation of the decision reached and to contest the decision.

## 7. For how long will we keep your personal 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 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 123.ie Customer Care directly to have this updated.
- 2 To request that 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 need to retain your personal data to meet legal or regulatory obligations or for our legitimate business purposes.
- 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 [123dataprotection@123.ie](mailto:123dataprotection@123.ie) or write to us at the address contained in Section 10 of this notice. When you are making a request please provide us with your name, address, date of birth and any policy 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 provide 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.

## **9. 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.

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

If you any questions or comments about this notice 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 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 [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 concern and will give you additional information about how it will be handled. We aim to respond in a reasonable timeframe, 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).

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