

At 123.ie, we're committed to ensuring your personal data is protected. This Notice explains how we use the information we collect about you and tells you about your data protection rights.

## 1. Who are we?

Where we refer to "we" "us" "our" we mean 123 Money Limited, trading as 123.ie, a wholly owned subsidiary of RSA Insurance Ireland DAC ('RSA') and part of the Intact Financial Corporation ('Intact') group of companies. We provide insurance products and services, and we also provide insurance services in partnership with other companies. We're a Data Controller in relation to your personal information. Our contact information is in Section 10 below.

## 2. What information do we collect about you and why?

We use your personal information to provide insurance services such as giving a quote or servicing your policy. We also use your information for matters such as complaints handling, prevention or detection of fraud and statistical analysis. The following (non-exhaustive) categories and types of personal information that we may collect and use about you (or other people to be insured) includes:

**Policy Information:** name, address, Eircode, contact details, phone numbers, date of birth, occupation, policy numbers, gender, driving licence details and penalty points information, vehicle details, renewal dates of policies with other insurers, bank and payment card details, claims data, vulnerability data (more information below), call recordings, images (e.g. CCTV), customer survey responses, geo-location and driving behaviour data.

**Information from Other Sources:** Penalty points, address look up, car details and history, GPS tracking (where you've a motor product which features this), claims history, Insurance Link information, online information. Section 3 has more detail.

**Health Data:** medical and health information, vulnerability data related to health (more information below).

**Criminal Conviction Data:** driving offences and conviction history.

**Marketing Preferences:** whether you want us to send you news and offers related to products and services.

**Online Information:** information collected 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, such as on-line identifiers like IP addresses.

**Note:** You don't have to provide us with any personal information, but if you don't provide information that we need, then we may not be able to proceed with your application for insurance or continue your policy. We will let you know what information is required to proceed with your application.

When looking for an insurance quote from us, you will need to provide us with information relating to what you wish to insure (e.g. car make/model, your home, details about you or other people to be insured). When buying certain products, we may need to collect special categories of data (e.g. medical or health information) and driving offences or convictions history. If you become vulnerable, due to a life event, health issue or other matter, we will seek to identify this and decide what additional support we can provide, so we can meet your needs and fulfil our obligations to you. 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 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 may be done via our website (including digital chat media), by email, SMS, mobile Apps, telephone calls and/or by post. Telephone calls and the other ways we contact you or you contact us may be recorded for quality assurance, training, verification and security purposes.

Where you have opted for a motor product involving 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).

When applying to us for an insurance policy, you may need to provide us with information relating to other people insured under the policy. You agree that you will bring this Notice to the attention of each person named on the policy at the earliest possible time. Ensure that anyone who is insured under your policy has agreed to provide their personal information to us. If you 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 car that collects information about where and how your car is driven.

Secondary processing of your personal information (i.e. for a purpose other than for which it was collected) may occur 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.

This table describes the purposes for which we use your personal data (from Section 2) and the legal basis for doing so.

| Purpose  | Legal Basis   |
|--|---|
| To provide you with an insurance quote and to provide you with insurance cover if you decide to buy a product.   | Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.                                   |
| To assess the information you have provided and decide whether we can provide you with cover and at what price.  |   |
| To verify your identity and to verify the accuracy of the information we receive.  | Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.                                   |
|  | Processing is necessary for the purposes of our legitimate interests to investigate and prevent potential fraud.  |
|  | Processing is necessary to comply with legal obligations Criminal Justice (Money Laundering and Terrorist Financing) Acts 2010 to 2021.                         |
| 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 to take steps at your request prior to entering into a contract.                                   |
| To arrange any payments in relation to your policy.  | Processing is based on your consent (to store your credit card data for future purchases only).   |
| If you have opted for a telematics motor insurance product, data collected via the smart sensor installed in your car may be used to determine the circumstances surrounding any claim under your policy, your car's location, kilometres travelled, driving behaviour (such as your car's speed) and also to identify any unacceptable driving. | Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.                                   |
|  | Processing is based on your consent (to access and store data on the smart sensor only).  |
|  | Processing is necessary for the purposes of our legitimate interests. The interest is to manage our business.   |
| 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 to investigate and prevent potential fraud and other illegal activity.                     |
|  | Processing is necessary to comply with legal obligations e.g. Criminal Justice Act 2011, Section 19.  |
| To manage and investigate any complaints.  | Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.                                   |
|  | Processing is necessary to comply with legal obligations e.g. Central Bank Codes of Conduct such as the Consumer Protection Code.                               |
| 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 or for customer satisfaction surveys.  | Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products and services and manage our business. |
| For quality assurance, training, records maintenance, verification and security purposes. For example, the recording or live monitoring of telephone calls.  | Processing is necessary for compliance with our legal obligations e.g. the Central Bank Minimum Competency Code and Minimum Competency Regulations 2017.        |
| For staff training, performance reviews and internal disciplinary purposes.  | Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products, and services.                        |
| 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 purposes.   | Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.                                   |
|  | Processing is necessary to comply with legal obligations e.g. Central Bank Guidance and Requirements.   |
|  | Processing is necessary for the purposes of our legitimate interests. The interest is to protect and to ensure the continuity of our business.                  |

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| To develop and improve how our machine learning, artificial intelligence and statistical modelling tools work.   | Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products, and services.   |
| For marketing purposes. Please see Section 5 below for more information on our marketing.  | Processing is based on your consent.   |
| To issue service-related communications to you such as policy renewal reminders, policy cover reminders, new website and customer service features or adverse weather alerts.  | Processing is necessary for our legitimate interests. This interest is to communicate important information to you, to ensure continuity of cover, awareness of policy cover, new service features and to help safeguard your property.  |
| Some cookies are essential to operate our websites and Apps. Other optional cookies are used by us and our third-party service providers to help improve our and their products and services, functionality and performance of our websites and Apps, and to support effective advertising. For further information please see our <a href="#">Cookie Policy</a> . | Processing is necessary for the performance of a contract or 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).<br><br>Processing is based on your consent. |

### 3. How else do we collect information about you?

Where possible, we will collect your personal information directly from you. However, we may receive information about you from other 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).
- The Underwriter of your policy i.e. your insurance company.
- Other companies within the Intact Group.
- 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.
- 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 points and no-claims discount information provided by customers.
- From 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 opted for a telematics motor insurance product.
- Through geocoding databases used to determine location-based risk factors (for example using your Eircode).
- Law enforcement agencies and government departments such as An Garda Síochána.
- From searches of publicly available information (e.g. social media platforms, online content, court judgements).
- From the Insurance Link claims anti-fraud database (for more information see [www.inslink.ie](http://www.inslink.ie)), from insurance companies and from other fraud prevention databases and data enrichment services available in the insurance industry. The aim of this is to help us to check information for fraud and to protect against misrepresentation.
- 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) to administer your policy, 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:

- Anyone authorised by you to act on your behalf.
- The Underwriter of your policy i.e. your insurance company.
- Our third-party service providers such as our information technology suppliers, cloud service providers, data storage providers, payment services providers, documentation fulfilment providers, digital platform providers, social media providers, marketing agencies and companies that deliver policy benefits, such as breakdown assistance.
- Other companies within the Intact Group.
- Property and Risk Surveyors.
- The Insurance Link claims anti-fraud database (for more information see [www.inslink.ie](http://www.inslink.ie)), with other insurance companies and with industry bodies such as Insurance Ireland.
- Other fraud prevention databases and data enrichment service providers available to the insurance industry.
- In the event that we may be taken over, or sell any business or assets, in which case we will disclose your personal information to the prospective buyer of such business or assets.
- 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 - as a result of our legal and regulatory obligations or on foot of a Court Order or Subpoena.

- We add details of your motor policy to the Irish Motor Insurance Database ('IMID') consisting of 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 under section 78A of the Road Traffic Act 1961 (as amended). This information can be used by government bodies such as An Garda Síochána and the MIBI for purposes permitted by law, including electronic licensing and law enforcement. 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 more information about how and why we use cookies, please visit our [Cookie Policy](#) on our website ([www.123.ie](http://www.123.ie)).

Sometimes the parties 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 European Commission adopted Standard Contractual Clauses (typically Module 1 and 2, which allow for transfers from Controllers in the EEA to Controllers or Processors outside the EEA), such as to India and the United States of America. We also rely on Adequacy decisions of the European Commission (including the United Kingdom and Canada). If you want more detail, please get in touch using the contact information below. You can also find out more on the European Commission's [website](#).

## 5. Marketing

If you have provided us with marketing consent, we 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, email and/or social media and digital channels (e.g. using platforms such as Facebook Custom Audiences, Google Customer Match, TV on demand).

To personalise the marketing messages we send to you, we may share some of your data with social media and digital platforms (in a secure way) so that where you hold an account with them, they can display messages from us to you, or to try to make sure you don't get irrelevant messages (for example, messages about products / services you already have).

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

## 6. Profiling, automated decision making and data analytics

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

- With our third-party partners, and with your consent, profiling exercises are performed using cookies that allows us to measure the effectiveness of our advertising by understanding the actions people take on our website and target our advertising across other websites or display networks to anonymised audiences based on their actions.
- We may place you in groups or segments with similar customers based on your profile. This helps us to design products, services and offers for different customer segments and to provide you with relevant marketing advertisements via digital channels and social media.
- Use your personal information to develop and improve our machine learning, artificial intelligence, statistical modelling and to develop or improve our products, services and processes.
- The use of Pricing and Underwriting engines 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/ 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.

The results of the Pricing and Telematics processes (specifically d and e above) will be used to assess your individual risk and to determine if we can provide, or continue to provide, you with a policy, to decide its terms and to 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 to contest the decision.

## 7. How long will we keep your personal information?

The Underwriter of your policy (insurance company) is also a Data Controller in relation to your personal information. You should also read their Data Protection Notice to determine how long they will keep your personal information. In general, we will retain your personal information for 7 years from the date of cancellation of your policy. Quote information (where a policy is not taken out) is generally retained for 6 months – though if you've asked to receive marketing information from us or asked us to contact you in advance of the renewal of another policy, your information will be kept for these (but be deleted once the purpose for collection no longer applies). We generally retain call recordings for 7 years from the date of the recording to comply with our regulatory obligations. There may be reasons why we need to retain your personal information for longer periods, for example to comply with our legal and regulatory obligations.

## 8. What are your Rights?

You have legal rights under data protection law in relation to your personal information:

- 1) **Right to Rectification:** Correct any information we hold about you if you think it's incorrect or incomplete.

- 2) **Right to Erasure:** Request your personal information be deleted where you believe it's no longer required. We may not always be able to do this, for example, while you're still insured with us or where we need to keep your personal data to meet legal or regulatory obligations.
- 3) **Right of Access:** Provide you with a copy of the personal information we hold about you.
- 4) **Right to Portability:** Request that we transfer a machine readable copy of the personal information you have given us, to another company.
- 5) **Right to Restriction:** Request that we restrict our use of your personal information in certain circumstances.
- 6) **Right to Object:** Object to the processing of your personal data for marketing purposes or for any purpose where processing (including profiling) is necessary for the purposes of our legitimate interests (see table above).
- 7) **Right to Withdraw Consent:** To withdraw your consent at any time, where your consent is our basis for using your data (see Section 2 table) without affecting the lawfulness of processing before consent is withdrawn.
- 8) **Right to Contest Decisions:** To contest decisions based solely on automated decision making, obtain an explanation of the decision reached, express your point of view, and ask for human intervention.

Please note that requests to object to or restrict the use of your personal information may lead to us being unable to continue to service your policy and lead to cancellation of your policy.

If you would like to request any of these Rights, please email us at [123dataprotection@123.ie](mailto:123dataprotection@123.ie) or write to us at the address at in Section 10 of this Notice. When you're making the request please provide us with your name, address, date of birth and any policy numbers that you have. You may 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, unless we think your request is manifestly unfounded or excessive in nature. We aim to respond within one month from receipt of your request. If we cannot, 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.

Submitting a request does not mean we will be able to complete it or complete it fully. 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, and that you can lodge a complaint with the Data Protection Commission or bring the matter to Court.

## 9. Changes to our Data Protection Notice

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

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

If you have any questions, 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) or visit [www.123.ie](http://www.123.ie).

## 11. How do you Complain?

If you're unhappy and want to complain, please contact us at [123dataprotection@123.ie](mailto:123dataprotection@123.ie) or write to us using the address above. Our Data Protection Officer will investigate your complaint and will give you more information about the complaint process. We aim to respond in a reasonable timeframe, normally within one month.

If you're not satisfied with our response you can contact the Data Protection Commission:

**Post:** Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28  
**Phone:** 01 7650100 / 1800 437 737  
**Email:** [info@dataprotection.ie](mailto:info@dataprotection.ie)  
**Web:** [www.dataprotection.ie](http://www.dataprotection.ie)

## 12. Representatives

The General Data Protection Regulation ('GDPR') requires organisations not established in the European Union ('EU') to designate an EU representative if they're subject to the GDPR, for example offering products/services to EU citizens.

Intact (who we refer to in Section 1) 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 at the following address [rsa.dp@eu.rsagroup.com](mailto:rsa.dp@eu.rsagroup.com). The EU Representative will address any issues and/or queries you may have related 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.

## **Important Note**

The Underwriter of your insurance policy (your insurance company) is also a Data Controller in relation to your personal information. You should also read their Data Protection Notice (sometimes also referred to as a 'Privacy Notice' or a 'Privacy Policy'). Detail of who the Underwriter of your policy is, is in your insurance documentation or within our 'Terms of Business' on our website. Our insurance partner for home and motor products, is RSA Insurance Ireland DAC and their Data Protection Notice is available on: [www.rsagroup.ie](http://www.rsagroup.ie) (on the bottom of each webpage). We can post RSA's Notice to you also. RSA's Notice includes further information on how RSA uses your personal information, for example, for claim handling or reinsurance purposes, your rights over this information and how to exercise these rights.

This Notice is effective from September 2023.

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