

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" or "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 personal insurance products and services and we also provide insurance services in partnership with other companies. We are the Data Controller in relation to the personal information we collect and hold about you. Contact information for us is available in Section 9 below.

#### Representatives

The General Data Protection Regulation ('GDPR') requires organisations that are 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 may undertake processing activities to which the GDPR applies and as they don't 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 directly 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 relating 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.

### 2. What information do we collect about you and for what purposes?

We will use your personal information to provide insurance services such as providing a quote. We will also use your information for related matters such as complaint handling, prevention or detection of fraud 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, and our partners, products and services.

The following (non-exhaustive) types or categories of personal information that we may collect and use about you (or other people to be insured) includes: name, address, date of birth, occupation, policy numbers, contact details, gender, marketing preferences and renewal dates of policies with other insurers, bank and payment card details, medical / health information, 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 information that we need, then we may not be able to proceed with your insurance application. We will let you know what information is required to proceed with your application.

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. details about you or other people to be insured). When buying certain products, we will on occasion need to collect special categories of data (e.g. medical or health information). 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/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 may be done via our website, by email, SMS, mobile Apps, telephone calls and/or by post. Telephone calls may be recorded for quality assurance, training, verification, and security purposes.

When applying to us for an insurance product, you may need to provide us with information relating to other persons named 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 opportunity. Please also ensure that anyone else who is insured under your policy has agreed to provide their personal information to us.

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 us 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](#) available on our website.

The below table describes the purposes for which we use your personal data and the legal basis for doing so.

Purpose	Legal Basis
To give you with a quote for an insurance product 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 verify your identity and to verify the accuracy of the information we receive.	<p>Processing is necessary for the performance of a contract or 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 fraud.</p> <p>Processing is necessary to comply with legal obligations e.g. Criminal Justice (Money Laundering and Terrorist Financing) Acts 2010 to 2021.</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 to take steps at your request prior to entering into a contract.
To arrange any payments in relation to your policy.	
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 fraud and other illegal activity.</p> <p>Processing is necessary to comply with legal obligations (e.g. Criminal Justice Act 2011, Section 19).</p>
To manage and investigate any complaints.	<p>Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.</p> <p>Processing is necessary to comply with legal obligations e.g. Central Bank Codes of Conduct such as the Consumer Protection Code.</p>
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 internal disciplinary purposes.	<p>Processing is necessary for compliance with our legal obligations e.g. the Central Bank Minimum Competency Code and Minimum Competency Regulations 2017.</p> <p>Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products, and services.</p>
To ensure the security of our systems; to make back-ups of your data in case of emergencies and for disaster recovery purposes.	<p>Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.</p> <p>Processing is necessary to comply with legal obligations e.g. Central Bank Guidance and Requirements.</p> <p>Processing is necessary for the purposes of our legitimate interests. The interest is to protect and to ensure the continuity of our business.</p>
For direct marketing purposes.	Processing is based on your specific consent.
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> (available on our website).	<p>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).</p> <p>Processing is based on your specific consent.</p>

### 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 people or sources. For example, it was given to us by someone who is applying for insurance on your behalf (e.g. spouse or partner). We may also collect 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.
- Our third-party service providers such as our information technology suppliers, cloud service providers, data storage providers, payment services providers, documentation fulfilment providers and marketing agencies.
- Other companies within the Intact Group.
- Law enforcement agencies, government departments, 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.
- 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 please see our [Cookie Policy](#).

Sometimes the organisations 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 the European Commission adopted Standard Contractual Clauses ('SCCs'), use of 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, 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 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 provided on our marketing SMS and email communications.

### 6. For how long will we keep your personal information?

The Underwriter of your policy 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. We will 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 information for longer periods, for example to comply with legal or regulatory obligations.

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

You have legal rights under data protection laws 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 retain 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 copy of the personal information you have given us, to another company. We would provide the information in a machine-readable format.
- 5) **Right to Restriction:** Request that we restrict the use of your personal information by us in certain circumstances.
- 6) **Right to Object:** 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) **Right to Withdraw Consent:** To withdraw consent, where your consent is our basis for using your personal data.
- 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.

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 at the bottom 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 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.

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, and that you can lodge a complaint with the Data Protection Commission or bring the matter to Court.

## 8. Changes to our Data Protection Notice

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

## 9. 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 can also email us: [123dataprotection@123.ie](mailto:123dataprotection@123.ie)

## 10. How do you Complain?

If you're unhappy with how we have handled your personal information and wish to complain about this, 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 additional information about how it will be handled. 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)

## Important Note

The Underwriter of your insurance is also a Data Controller in relation to your personal information. You should also read their Data Protection Notice (sometimes referred to as a 'Data Privacy Notice' or a 'Privacy Notice').

This Notice is effective from April 2022.