

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.

Who are we?

123 Money Limited, trading as 123.ie, is a wholly owned subsidiary of RSA Insurance Ireland DAC. 123.ie is a Data Controller in relation to the personal information we collect and hold about you.

Why do we collect and use your personal information?

We will collect and use your personal information for the provision of insurance services such as providing a quotation. We will also use your data for other 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 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 insured (e.g. details about you). When buying certain products, we will on occasion need to collect special categories of data (e.g. medical 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 arrange payments from 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, email, SMS, telephone calls and/or by post. Telephone calls may be recorded for training and verification purposes.

When submitting an application 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 Data Protection 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 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 are allowed to use your personal information in the manner described in this notice. In order to provide you with this detail, 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.

Purpose	Legal Basis
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 arrange any payments in relation to your policy.	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 investigate any claims made by you or another person under your policy.	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 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 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 or in order to take steps at your request prior to entering into a contract. Processing is necessary to comply with legal obligations.
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.	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 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 Cookie Policy .	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.

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). We may also collect personal data collected through website cookies processing e.g. IP address.

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, 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 with :

- Anyone authorised by you to act on your behalf.
- The Underwriter of your policy.
- Our Third Party Service Providers such as our Information Technology (IT) suppliers, Cloud Service Providers, data storage providers, payment services providers and documentation fulfilment providers.
- 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.
- 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](#).

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 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.

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, telephoning us or by using the 'unsubscribe' option facility provided on our marketing SMS and email communications.

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 6 years from the date of the quotation. We will retain call recordings and emails for 8 years from the date of the communication to comply with our regulatory obligations.

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. Correct any information we hold about you if you think it's incorrect or incomplete.
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 or for our legitimate business purposes.
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 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. Request that we restrict the use of your personal information by us in certain circumstances.
6. 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.

Requests to restrict the use of your personal 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 Rights, please email us at 123dataprotection@123.ie or write to us at the address contained in Section 10 of this notice. 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 made 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 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, 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.

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.

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

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 information and wish to raise a concern about this, please contact us at 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 within 30 days. If you are not satisfied with our response you can raise a concern with the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28 Ireland or visit 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.

[Irish Life Health](#)

[Irish Life Assurance](#)

123 Money Ltd. trading as 123.ie is regulated by the Central Bank of Ireland. Registered Office: RSA House, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16, D16 FC92.
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