



# Data Protection Notice

February 2020



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In order to help you in understanding terminology used within this document, we have marked certain words with an \*. These definitions can be found on pages 4 and 5 of this document.

# Privacy Terminology Explained

**Automated Decision Making:** where a decision is taken solely by Processing\* Personal Data\* by automated means (for example by a computer applying certain logic when getting a quote) without any human intervening, it is an automated decision. There are certain rules in the General Data Protection Regulation about Automated Decision Making\* if the decision has a significant effect on the person who it relates to.

**Data Controller:** is a person, company or entity who controls Personal Data\* i.e. the Data Controller has Personal Data\* and makes decisions about how and for what reason it will be processed.

**Data Protection Law:** this means the Data Protection Law currently in force in Ireland and Europe. The Irish Data Protection Law is called the Data Protection Act 2018. The law currently in force in the European Union is the General Data Protection Regulation\*.

**For our Legitimate Interests in Managing our Business:** this is one of the reasons (a legal basis) we are allowed to process your data for. In order to manage our business effectively, we need to process your Personal Data\* in this way. Before Processing\* your data for this reason, we have carefully considered whether it will cause you any negative consequences and whether we can justify this Processing\*.

**General Data Protection Regulation (GDPR):** the General Data Protection Regulation is European law which came into force on 25 May 2018. It builds on existing rules and makes new rules about how a person's Personal Data\* must be treated. Its aim is to make sure that all companies and entities that handle Personal Data\* respect and protect it, so that people's privacy is taken seriously.

**IP Address:** is a unique identifying number given to a device, that allows that device to communicate with other devices over a computer network like the internet.

**Joint Proposer:** If a person is arranging property insurance with another party (for example with a partner) they are known as joint proposers.

**Legal Basis for Processing\*:** we are not allowed to process your Personal Data\* unless we need to for one of the reasons set out in the GDPR. The reasons include, for example, if we need to process your data to enter into a contract with you. Each reason for Processing\* is called a Legal Basis for Processing\* because it is set out in law as a legitimate reason to process your Personal Data\*.

**Liberty International Holdings Inc:** is a company registered in the USA, with company number 2356506 and registered office at 251 Little Falls Drive, Wilmington, Delaware 19808, United States.

**Liberty Mutual Group Inc.:** is a company registered in the USA, with company number 000804945 and registered office at c/o Corporation Service Company, 84 State Street, Boston, Massachusetts, 02109, United States.

**Liberty Mutual Insurance Company:** is a company registered in the USA, with company number 041543470 and registered office at c/o Corporation Service Company, 84 State Street, Boston, Massachusetts, 02109, United States

**Liberty Mutual Technology Group Inc:** is a company registered in the USA, with company number 6174315 and registered office 251 Little Falls Drive, Wilmington, Delaware 19808, United States.

**Liberty Seguros:** Compania De Seguros Y Reaseguros SA is a company registered in Spain under registration fiscal code and VAT number A-48037642, and registered office at Paseo de las Doce Estrellas 4, 28042 Madrid, Spain.

**Market and Customer Research:** involves researching the market to improve or create new processes, products and services. Market research includes researching preferences, motivations and buying behaviour of customers. For example, this can be done through direct observation, surveys, telephone/face to face interviews, focus groups, from published sources such as demographic data and more.

**Metadata:** a set of data that describes and gives information about other data.

**Named Driver:** a named driver is a person who is covered under an insurance policy provided by us to another person i.e. the Policyholder\*, but does not have a direct relationship with us.

**Performance of the Insurance Policy:** one of the legal bases for Processing\* (i.e. one of the reasons we are allowed process your Personal Data\*) is in order to enter into a contract with you at your request. This is the legal basis we are referring to when we say 'Performance of the Insurance Policy' i.e. the insurance policy is the contract.

**Personal Data:** Personal Data is information about or relating to and identified or identifiable person, for example a name, number, identifier or other factors specific to their identity.

**Policyholder:** a policyholder is a person who has an active policy with us.

**Processing:** the term processing is very broad. It means anything that is done to, or with, Personal Data\* (including collecting, storing, sharing or deleting data).

**Reserving:** as an insurance company, we deal with claims that are made against the policies that we sell. Some claims are complex and take time to settle. Reserving is the process whereby money is set aside by us for losses that have occurred but have not yet been settled.

**Reinsurance:** is a form of an insurance cover for us, as the insurer which involves sharing our risk with other insurers, to limit our overall loss.

**Reporting Purposes, where necessary, within Liberty Mutual Group:** This reporting is done for statistical analyses with our parent group, and for the review and improvement of our products, services, processes, systems, websites and applications etc. Where possible we will anonymise the data we analyse.

**Special Categories of Data:** special categories of data are types of Personal Data\* that are considered particularly sensitive that require additional protection. Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership is in this special category of data, as is data concerning health or sex life and sexual orientation.

**Statistical Analyses within the EEA:** We use Personal Data\* for statistical analyses, within the European Economic Area (EEA), which is used to review and improve our processes, products, services, systems, website, applications etc. Where possible we will anonymise the data we analyse.

**Third Party:** when we say 'third party' we mean a person who is not a Policyholder\* or a named driver\*, but whose Personal Data\* we have for some other reason. A third party might be a witness to an incident, a party to a claim, a medical expert, An Garda Síochána etc.

**To Comply with Our Legal Obligations:** this is one of the reasons (a legal basis) we are allowed to process your data for. As an insurance company we have to comply with a large number of laws. The laws that are most likely to cause us to process your Personal Data\* are Data Protection Law and the Consumer Protection Code 2012 as amended.

**Unaccepted Quotes:** Insurance quotes not taken out.

**Unspent Criminal Convictions:** These are convictions that are required to be disclosed when supplying data on past convictions.

**Spent convictions:** These are convictions that do not have to be disclosed as long as it qualifies under the terms of the Children Act 2001 or Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016.

**We, us, our:** Liberty Seguros Compania de Seguros Y Reaseguros S.A., with its address at Paseo de las Doce Estrellas 4, 28042 Madrid, Spain, registered as a branch in Ireland (as Liberty Insurance) with Irish branch number 904632 and branch address at Dublin Road, Cavan. Co. Cavan, Ireland.

# Data Protection Notice

## Overview

At Liberty Insurance we take your privacy seriously and we aim to be clear about how we use Personal Data\* relating to you. This Data Protection Notice ('the Notice') describes what Personal Data\* we process\* and why. The Privacy Terminology Explained section above helps to explain any terms we use in this Notice, marked with a \*, that may be unfamiliar to you.

This Notice includes the relevant requirements of the General Data Protection Regulation\* and it will give you information about:

**1. Who we are and how to contact us**

**2. Personal Data\* we use and where we get this data from**

**3. Why we process your Personal Data\* and what our legal basis for doing so is**

**4. What if you choose not to provide certain Personal Data\* to us**

**5. Who we disclose your Personal Data\* to and why**

**6. Which countries we transfer some or all of your Personal Data\* to**

**7. How long do we keep your Personal Data\* for**

**8. Your rights to access, correct, delete, portability and restrict the use of your Personal Data\***

**9. Automated Decision Making\***

**10. Your right to make a complaint**

**11. How and why we contact you**

**12. Security**

## Important Notice:

- This Notice applies to all your dealings with us whether online or through offline correspondence.
- Are you providing us with information relating to other people such as named drivers\* or Joint Proposers\*?

If yes, it is your responsibility to ensure that you have:

- obtained the permission of any person who is also covered by your insurance policy
- shown this Notice to them so that they understand how we process their Personal Data\* for the purposes outlined in this Notice.
- The policy of insurance is a contract between Liberty Insurance and any and all named drivers\* for data protection purposes only. A named driver\* is not party to the contract under any other circumstances and the terms and conditions of the insurance policy are not affected.

With your consent, we will use your Personal Data\* for marketing purposes. For more information please read section 11.

## Changes to this Notice

Like any business, our business will change over time and so will the way we use and protect your Personal Data\*. As a result we may need to make changes to this Notice. These changes will not reduce your rights or the level of protection we apply to your Personal Data\*. The most up to date Notice will always be published on our websites and we will clearly identify the changes we have made in any updates. We encourage you to visit our website from time to time to keep informed about how we use your Personal Data\* and how we keep it protected or just ask us, please see Section 1 for our contact details.

## 1. Who we are and how to contact us

When we refer to Liberty in this Notice we mean:

Liberty Seguros Compania de Seguros Y Reaseguros S.A., with its address at Paseo de las Doce Estrellas 4, 28042 Madrid, Spain, registered as a branch in Ireland (as Liberty Insurance) with Irish branch number 904632 and branch address at Dublin Road, Cavan. Co. Cavan, Ireland.

There are other companies within the Liberty group of companies who will also have access to your Personal Data\*. They are receiving Personal Data\* from us in order to provide services to us and therefore they are acting as data processors for us. This does not reduce your rights or the level of protection we apply to your Personal Data\*:

Liberty Group Company	Category of Personal Data* Processed*	Purpose for which Personal Data* is Disclosed
Liberty Mutual Technology Group Inc*	All categories of Personal Data*	To provide us with technology services relating to data hosting, storage and back-up
Liberty International Holdings Inc*	All categories of Personal Data*	To provide us with statistical and data analytics services to assist in planning for new products and services.
Liberty Mutual Insurance Company*	All categories of Personal Data*	<ul style="list-style-type: none"> <li>• For compliance with legal, regulatory and other good governance obligations and business ethics relating to the screening of data in compliance with financial sanctions obligations;</li> <li>• For intra group Reinsurance* purposes;</li> <li>• For the provision of support and consultancy services for pricing and Reserving* purposes.</li> </ul>
Liberty Mutual Group, Inc*		

You can contact us if you have any questions about how your Personal Data\* is processed\* by contacting our Data Protection Officer by email: [DataProtectionOfficer@libertyinsurance.ie](mailto:DataProtectionOfficer@libertyinsurance.ie); by post: Data Protection Officer, Liberty Insurance, Dublin Road, Co. Cavan; or by telephone: 1890 944 412.



## 2. Personal Data\* we use and where we get that Personal Data\* from

As an insurance company we need to collect many categories of Personal Data\* (about you and other parties) for the purposes set out in this Notice. If you do not provide the information that we need, we may not be able to offer you a quote or a policy or we may not be able to handle your claim. If we can give you a quote, your premium may be higher than if you had provided the information to us.

The table below explains the category and type of Personal Data\* we collect and process about you and where we get that data from.

Category of Personal Data* We Process*	Type of Personal Data*	Where we get this Personal Data* from
Individual details	Name, address (including proof of address), other contact details, gender, marketing preferences, marital status, occupation, date of birth, financial details, IP Address*, Metadata*, vehicle registration number, and family details including their relationship to you.	<ul style="list-style-type: none"> <li>• you;</li> <li>• your family members;</li> <li>• joint proposer* or anyone else insured under the policy;</li> <li>• legal representative of a minor;</li> <li>• your insurance broker or intermediary;</li> <li>• your employer or representative which includes anyone who you have authorised to act on your behalf such as a legal representative or a translator;</li> <li>• any other records which we may hold about you if you have or had any other contracts of insurance with or sought a quote from a Liberty Group company.</li> </ul>
Identification details	Identification numbers issued by government bodies or agencies, including your PPS Number or your National Insurance number (if you are in the United Kingdom), driver identity number, driving licence number, vehicle identification number, passport number and tax identification number.	<ul style="list-style-type: none"> <li>• you;</li> <li>• your family members;</li> <li>• joint proposer* or anyone else insured under the policy;</li> <li>• your insurance broker or intermediary;</li> <li>• your employer or representative which includes anyone who you have authorised to act on your behalf such as a legal representative or a translator;</li> <li>• any other records which we may hold about you if you have or had any other contracts of insurance with or sought a quote from a Liberty Group company.</li> </ul>
Risk details	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This can include data relating to your criminal convictions, your claims history, your vehicle details and history to include NCT/MOT status, taxation and import status, driving licence history and experience, your health, or other Special Categories of Data* as explained in more detail below.	<ul style="list-style-type: none"> <li>• you;</li> <li>• your family members;</li> <li>• joint proposer* or anyone else insured under the policy;</li> <li>• your insurance broker or intermediary;</li> <li>• your employer or representative which includes anyone who you have authorised to act on your behalf such as legal representative or a translator;</li> <li>• anti-fraud databases, court judgements and other databases;</li> <li>• risk assessment service providers;</li> <li>• geographical databases and insurance industry bodies and their databases including the Insurance Link database;</li> <li>• publicly available information including social media websites, online content, TV, radio, and other media content;</li> <li>• Government agencies, statutory bodies and their databases including the National Vehicle and Drivers File (NVDF) and Integrated Information Data System (IIDS);</li> <li>• An Garda Síochána the Police, and other law-enforcement agencies;</li> <li>• other insurers;</li> <li>• any other records which we may hold about you if you have or had any other contracts of insurance with or sought a quote from a Liberty Group company.</li> </ul>

Category of Personal Data* We Process*	Type of Personal Data*	Where we get this Personal Data* from
Policy information	Information about the quotes you receive and policies you take out.	<ul style="list-style-type: none"> <li>• you;</li> <li>• your family members;</li> <li>• joint proposer* or anyone else insured under the policy;</li> <li>• your insurance broker or intermediary;</li> <li>• insurance industry databases including the Insurance Link database</li> <li>• other insurers;</li> <li>• any other records which we may hold about you if you have or had any other contracts of insurance with or sought a quote from a Liberty Group company.</li> </ul>
Claims information	Information about previous and current claims (including other unrelated insurances), which can include data relating to your relevant criminal convictions, your health (e.g. injuries and relevant pre-existing conditions), debt, bankruptcy or other Special Categories of Data* as explained in more detail below. Recognisable images captured by systems including CCTV.	<ul style="list-style-type: none"> <li>• you;</li> <li>• your family;</li> <li>• joint proposer* or anyone else insured under the policy;</li> <li>• your insurance broker or intermediary;</li> <li>• your employer or representative which includes anyone who you have authorised to act on your behalf such as a legal representative or a translator;</li> <li>• other insurers;</li> <li>• third parties including the other party to a claim, witnesses, experts (including medical experts), loss adjustors, repairers, loss assessors, investigators, medical and legal practitioners, An Garda Síochána, the Police, and other law-enforcement agencies, claims management firms and solicitors;</li> <li>• publicly available information including social media websites, online content, TV, radio, other media content and court judgments;</li> <li>• Government agencies, statutory bodies and their databases including the Motor Insurance Bureau of Ireland (We may also get information from the UK entity, Motor Insurer’s Bureau) and the Personal Injuries Assessment Board;</li> <li>• insurance industry databases including the Insurance Link database<sup>o</sup>, Employers’ Liability Tracing Office (if you are in the United Kingdom) and Cache (if you are in the United Kingdom);</li> <li>• any other records which we may hold about you if you have or had any other contracts of insurance with or sought a quote from a Liberty Group Company.</li> </ul>
Credit and anti-fraud data	Credit history, debt, credit score, and criminal convictions, bankruptcy and information received from various anti-fraud databases relating to you.	<ul style="list-style-type: none"> <li>• credit reference agencies;</li> <li>• anti-fraud databases, court judgements and other databases;</li> <li>• An Garda Síochána, the Police and other law-enforcement agencies and fraud prevention agencies.</li> </ul>

<sup>o</sup>You can obtain confirmation on what information is held about you and your previous claims in the Republic of Ireland on Insurance Link by visiting [www.inslink.ie](http://www.inslink.ie)

## Special Categories of Data\* and Criminal Convictions Data

Special Categories of Data\* and personal data relating to criminal convictions and offences are treated slightly differently to other Personal Data\* as there could be a greater impact if there was unauthorised use of this data, and therefore greater protection is needed. In the table below we show the Special Categories of Data\* and Criminal Conviction Data we collect and use:

	Type of Personal Data*	Where we collect this Personal Data* from
Special Categories of Data*	Information about your health	<ul style="list-style-type: none"> <li>• you;</li> <li>• your family members;</li> <li>• your employer or representative which includes anyone who you have authorised to act on your behalf such as a translator;</li> <li>• your insurance broker or intermediary;</li> <li>• insurance industry databases including the Insurance Link database<sup>o</sup></li> <li>• any other records which we may hold about you if you have or had any other contracts of insurance with or sought a quote from a Liberty Group company.</li> </ul>
Criminal Convictions Data and offences including penalty points	Details relating to any Unspent Criminal Convictions */ offences you and anybody else covered under your policy may have or have committed.	<ul style="list-style-type: none"> <li>• you;</li> <li>• your family members;</li> <li>• your employer or representative;</li> <li>• anti-fraud databases, sanctions lists, court judgements and other databases;</li> <li>• your Insurance Broker or intermediary;</li> <li>• insurance industry databases including the Insurance Link database<sup>o</sup>, the National Vehicle Drive File (NVDF) and Integrated Information Data System (IIDS);</li> <li>• An Garda Síochána, the Police and other law-enforcement agencies and fraud prevention agencies;</li> <li>• any other records which we may hold about you if you have or had any other contracts of insurance with or sought a quote from a Liberty Group company</li> </ul>

<sup>o</sup>You can obtain confirmation on what information is held about you and your previous claims in the Republic of Ireland on Insurance Link by visiting [www.inslink.ie](http://www.inslink.ie)

IIDS (Integrated Information Data Service) is a shared member's database that by arrangement with the Department of Transport allows us to confirm the accuracy of penalty points and no claims discount information provided by customers with motor policies.

When we provide you with a quote or renew your policy of motor insurance, we access the NVDF and IIDS controlled by the Department of Transport, Tourism and Sport to validate: driver numbers and number of penalty points per driver.

### 3. Why we process your Personal Data\* and what our legal basis for doing so is

We are legally required to tell you the Legal Basis for Processing\* your Personal Data\* and this is why we have included the 'Legal Basis for Processing\*' column below.

We process your Personal Data\* for the following purposes and each purpose applies to all of the types of Personal Data\* listed, above in Section 2 of this Notice: Individual Details, Identification details, Policy Information, Risk Details, Claims information and Credit and Anti-Fraud Data, unless otherwise stated:

Purpose for which it is used	Legal Basis for Processing* your Personal Data*		
	If you are a Policy Holder*	If you are a Named Driver*	If you are a Third Party*
To assess insurance needs and the nature and level of risk associated with the proposed insurance policy to determine eligibility and premium	Performance of the Insurance Policy*		Not applicable
To verify your identity or the identity of your authorised representative (we only use your individual details for this purpose)	Performance of the Insurance Policy* To Comply with our Legal Obligations*	To Comply with our Legal Obligations*	For our Legitimate Interests in Managing our Business* <i>(if you are a non-motor claimant who is not a Policyholder*, we have to process your Personal Data* for this purpose to Comply with our Legal Obligations*)</i>
To verify the accuracy of the information we receive (we only use your identification details for this purpose)	Performance of the Insurance Policy*	To Comply with our Legal Obligations*	
To administer and manage your policy	Performance of the Insurance Policy*		Not applicable
To make or receive any payments, whether in relation to your policy, a claim or any other reason and to make decisions regarding deferred payment arrangements, including without limitation whether to continue or to extend an existing deferred payment arrangement	Performance of the Insurance Policy*	To Comply with our Legal Obligations*	
To provide customer loyalty programmes and value added services	<ul style="list-style-type: none"> <li>For our Legitimate Interests in Managing our Business*</li> <li>Explicit consent in the case of certain profiling and marketing</li> </ul>	Not applicable	
To inform you of other products and services that may be of interest to you or members of your family, subject to your preferences	Explicit consent For more details please see Section 11.	Not applicable	

Purpose for which it is used	Legal Basis for Processing* your Personal Data*		
	If you are a Policy Holder*	If you are a Named Driver*	If you are a Third Party*
To carry out Market and Customer Research*	For our Legitimate Interests in Managing our Business*	Not applicable	
For staff training, performance reviews, records and discipline	For our Legitimate Interests in Managing our Business*		
To manage and investigate any complaints	Performance of the Insurance Policy*	Not applicable	
To manage and investigate claims. This includes claims made by or against you or anybody insured under your policy of insurance. It also includes claims where you (or anybody else insured under your policy of insurance) are or may be a witness to an incident which results in a claim.	Performance of the Insurance Policy*	To Comply with our Legal Obligations*	
Statistical Analyses within the EEA*	For our Legitimate Interests in Managing our Business*		
For Reporting Purposes where necessary within Liberty Mutual Group*	For our Legitimate Interests in Managing our Business*		
For Reinsurance* purposes	For our Legitimate Interests in Managing our Business*		
For compliance with all relevant laws and regulations	To Comply with our Legal Obligations*		
In order to store Personal Data *	Quotation data: For our Legitimate Interests in Managing our Business*		Not applicable
	Policy documentation: Performance of the Insurance Policy *		Not applicable
	Policy documentation: To Comply with our Legal Obligations*		Not applicable
	Claims information: To Comply with our Legal Obligations*		
	Claims information: For our Legitimate Interests in Managing our Business*		
	Claims information where there is the potential for a minor to make a claim: For our Legitimate Interests in Managing our Business*		
In order to make back-ups of that data in case of emergencies and for disaster recovery purposes	For our Legitimate Interests in Managing our Business*		

Note: Where we have relied on our 'legitimate interests' as the Legal Basis for any Processing\*, you have the right to object to that Processing\*. For more information please see Section 8.

In the table below we show the Special Categories of Data\* we collect and use, and the legal basis for that use:

Special Categories of Data* we Process	Purpose of Processing*	Legal Basis for Processing*
Information about your health	Health data is used for the purposes of providing quotes and underwriting, Processing* any claims you may have, managing Reinsurance* arrangements, fraud investigation and handling any complaints you may have.	For our Legitimate Interests in Managing our Business* - under Irish Data Protection Law* we are permitted to use health data in connection with your insurance policy.

In the table below, we detail the reasons we collect and use data relating to criminal convictions and the legal basis for that use. This criminal convictions data includes details relating to any Unspent Criminal Convictions\* (including penalty points), you and anybody else covered under your policy may have.

Purpose for Processing*	Legal Basis for Processing*		
	If you are a Policy Holder*	If you are a Named Driver**	If you are a Third Party*
To assess your insurance needs; the nature and level of the risk associated with your proposed insurance policy; your eligibility and (if you are eligible) your premium	Performance of the Insurance Policy*		Not applicable
For the detection and prevention of fraud, money laundering and other offences and to assist An Garda Síochána or any other authorised investigatory body or authority with any inquiries or investigations. In some cases we are required by law to report details of certain criminal activities and suspected criminal activities to the appropriate authorities	To Comply with our Legal Obligations*		
To manage and investigate claims. This includes claims made by or against you or anybody insured under your policy of insurance. It also includes claims where you (or anybody else insured under your policy of insurance) are or may be a witness to an incident which results in a claim	Under Irish Data Protection Law* we are permitted to process criminal conviction data (including penalty points) in connection with, legal claims, prospective legal claims, legal proceedings or prospective legal proceedings		

\*\* The policy of insurance is a contract between Liberty and any and all Named Drivers\* for data protection purposes only. A named driver\* is not party to the contract under any other circumstances and the terms and conditions of the insurance policy are not affected.

## 4. What if you choose not to provide certain Personal Data\* to us

You are entitled to decide not to provide or, where we are relying on consent as the Legal Basis for Processing\* your Personal Data\*, to withdraw consent to allow us to process the Personal Data\* we need for the purposes listed above.

You should note that without that Personal Data\* we may be unable to provide you with quotes, a policy, manage policies on your behalf or process claims and therefore you will not be able to benefit from the products or services we offer.

If you have questions about the consequences for you of withdrawing consent or not providing certain Personal Data\*, please contact us. Please see Section 1 for our contact details.

### What if Your Information is Anonymised?

Anonymisation means that you cannot be identified from the data either by itself or when combined with any other data we hold. That data will not be subject to this Notice or Data Protection Law\*.

We may anonymise (delete or de-personalise) Personal Data\* via a monthly automated process where Unaccepted Quotes\* are older than 14 months and where policies have been inactive for more than six years. We may use this anonymised information for insurance administration purposes including analysis of trends, carrying out actuarial work, planning how we deliver insurance service, assessing risk and assessing costs and charges.

## 5. Who we disclose your Personal Data\* to and why

### To take instructions in relation to your policy

We will only take instructions to change a policy from you, your broker, parent or your husband/wife/civil partner.

We will only take instruction to cancel or lapse a policy from you. In some cases, we will deal with other people contacting us on your behalf, as long as we have your permission.

**If you would like us to deal only with you please let us know. Please see Section 1 for our contact details.**

Even where your preference is that we deal only with you, in exceptional circumstances we may need to deal with other people, for example, if you are incapacitated and if your next of kin contacts us in relation to your policy.

### To share information as part of the day to day administration of your policy

We may share information about you, your claims and driving history with any of the below categories of agents and service providers, in order to comply with one or more legal obligations and to receive services from those third parties:

Category Agent/Service Provider	Details
Liberty Mutual Group Companies	<ul style="list-style-type: none"> <li>• Liberty Mutual Technology Group</li> <li>• Liberty International Holdings Inc*</li> <li>• Liberty Mutual Insurance Company*</li> <li>• Liberty Mutual Group Inc.</li> <li>• Liberty Seguros Compania de Seguros Y Reaseguros S.A.*</li> </ul>
Other Insurers/Intermediaries	<ul style="list-style-type: none"> <li>• Insurers</li> <li>• Reinsurers</li> <li>• Brokers</li> </ul>
Government/Regulatory/Statutory Bodies	<ul style="list-style-type: none"> <li>• The Department of Transport</li> <li>• Central Bank of Ireland (to include their National Claims Information Database)</li> <li>• Data Protection Commission</li> <li>• Information Commissioner’s Office</li> <li>• Motor Insurer’s Bureau of Ireland</li> <li>• Motor Insurer’s Bureau UK</li> <li>• The Revenue Commissioners</li> <li>• The Inland Revenue</li> <li>• Personal Injuries Assessment Board</li> <li>• The Financial Services Ombudsman</li> <li>• Financial Conduct Authority</li> <li>• Financial Ombudsman Service</li> <li>• The Driver and Vehicle Licensing Agency</li> <li>• Other Government agencies</li> </ul>
Law Enforcement Agencies	<ul style="list-style-type: none"> <li>• An Garda Síochána</li> <li>• Police</li> <li>• Other law enforcement agencies</li> </ul>
External Databases	<ul style="list-style-type: none"> <li>• Insurance Link</li> <li>• Integrated Information Data System</li> <li>• Motor Insurers Database</li> <li>• Employers Liability Trading Office</li> <li>• Cache</li> <li>• Motor Third Party Liability Database (see Note 1 below)</li> <li>• Verisk Insurance Solutions Limited</li> </ul>
Marketing	<ul style="list-style-type: none"> <li>• Marketing research</li> <li>• Customer surveys</li> <li>• Social media follow-up</li> <li>• Marketing communication services</li> </ul>
Public Registers	<ul style="list-style-type: none"> <li>• Credit checks</li> <li>• Court judgement</li> <li>• Bankruptcy</li> <li>• Anti-Money Laundering and Counter Terrorism Financing lists</li> <li>• Repossessions</li> <li>• Electoral Register</li> </ul>



Category Agent/Service Provider	Details
Agents/Service Providers	<ul style="list-style-type: none"> <li>• Claims investigators</li> <li>• Loss adjusters</li> <li>• Motor assessors</li> <li>• Private investigators</li> <li>• Vehicle check suppliers/databases</li> <li>• Documentation providers</li> <li>• Contact Centre providers</li> <li>• Out of Hours claims notification</li> <li>• International claims handling firms</li> <li>• Windscreen repairers</li> <li>• Breakdown assistance</li> <li>• Garages</li> <li>• Surveyors</li> <li>• Solicitors</li> <li>• Car rental</li> <li>• Engineers</li> <li>• Salvage companies</li> <li>• Banking/payments service providers (Realex)</li> <li>• IT Systems providers</li> <li>• Telecoms companies</li> <li>• Postal services</li> <li>• Flood mapping</li> <li>• Contact Centre Service Provider</li> </ul>

Note 1. We will also add details of your policy to the Motor Third Party Liability Database maintained by the Motor Insurers Bureau of Ireland (MIBI). MIBI will make this information available to the Minister for Transport, Tourism and Sport and An Garda Síochána for the purposes of section 78A of the Road Traffic Act 1961 (as amended). MIBI may also use this information to: comply with its own legal obligations (e.g. to provide information to members of the public who were involved in an accident with an unidentified driver pursuant to regulation 5(5) of SI 651/2003 (as amended)); and for the performance of its obligations pursuant to the agreement with the Minister for Transport dated 29 January 2009 (as amended from time to time) which was entered into to provide compensation to individuals involved in accidents with uninsured drivers.

More details can be found on the MIBI data protection webpage at this link - [www.mibi.ie](http://www.mibi.ie)

### **If we sell any part of our business including your policy**

We may disclose Personal Data\*, including Special Categories of Data\* described above, to anyone we transfer our rights and duties to under this policy, for example, to a third party in relation to any sale(s) of our business in whole or part. For the avoidance of doubt such disclosure would only be to actual buyers of the business in whole or in part, not to potential buyers.

## 6. Which countries we transfer some or all of your Personal Data\* to

We may transfer your Personal Data\* to countries outside of the European Economic Area, including the UK. Where we do so, Liberty ensures the privacy and integrity of your Personal Data\* by putting appropriate contractual safeguards in place between Liberty Group companies and our/their agents, cloud and other service providers. If you would like more information about the safeguards that are in place in connection with these transfers of Personal Data\*, please contact us using the contact details in Section 1.

Currently we transfer your Personal Data\* as follows:

Liberty Company Name	Categories of Personal Data*	Why we transfer data?	Where do we transfer data to?
Liberty Mutual Technology Group Inc.* (Liberty Mutual Hosting Services)	All types of Personal Data*	For data centre storage/applications hosting purposes namely: <ul style="list-style-type: none"> <li>• for storing it in a single secure centralised location (currently at the data hub operated by Liberty Mutual Technology Group Inc.* in Poland);</li> <li>• for storing it in a secure back up facility (currently a facility owned and operated by Liberty Mutual Insurance Company*) in order to protect it in the event of temporary or permanent loss or damage to any of the data stored at the data hub operated by Liberty Mutual Technology Group Inc.*</li> </ul>	USA Poland
Liberty International Holdings, Inc.*	All types of Personal Data*	For statistical and data analytics services for Liberty specific business and product planning purposes.	USA
Liberty Mutual Insurance Company*	All types of Personal Data*	<ul style="list-style-type: none"> <li>• For the purpose of compliance with legal, regulatory and other good governance obligations and business ethics relating to the screening of data in compliance with financial sanctions obligations.</li> <li>• For intra group Reinsurance* purposes.</li> <li>• For the provision of support and consultancy services for pricing and Reserving* purposes.</li> </ul>	USA
Liberty Mutual Group Inc*			
Liberty Seguros Compania de Seguros Y Reaseguros* S.A.	All types of Personal Data	For cross-border processing activities.	Spain, Portugal

Third Party Supplier Name/Category Agent/Service Provider	Categories of Personal Data *	Why we transfer data?	Where do we transfer data to?
Sogeti Ireland Limited	All types of Personal Data*	For software development services to assist Liberty in its data strategy, including cloud storage.	India, UK
Harlosh Limited (t/a Target) and its subcontractor TechMahindra	All types of Personal Data*	For software development and applications support services.	India, UK
EXL Service Holdings, Inc.	All types of Personal Data*	Administrative support with centralised finance and billing processes.	India, USA
Amazon Web Services Inc. (AWS)	All types of Personal Data*	Liberty Group is working with AWS on a global cloud data storage project for Liberty data which may include Personal Data* of employees and customers.	USA
Microsoft Inc.	All types of Personal Data*	Liberty Group is working with Microsoft Inc. on a global cloud data storage project for desktop applications such as email exchange and sharepoint.	USA
Thornpart Loss Adjusters Limited / Escribe Outsourcing Services Private Limited	All types of Personal Data*	In connection with the household insurance claims support services provided to Liberty by Thornpart Loss Adjusters Limited, certain data is shared with Escribe Outsourcing Services Private Limited who provide Thornpart Loss Adjusters Limited with administration support services.	Canada, India
Twilio Inc.	All types of Personal Data*	As external service provider for telecommunication and contact centre services.	USA
Various UK External Databases/Agents/ Service Providers as listed in Section 5 above.	All types of Personal Data*	In order to comply with one or more legal obligations and to receive services from those categories of third parties listed in Section 5 above.	UK

## 7. How long do we hold your Personal Data\* for

We will keep your Personal Data\* for as long as reasonably necessary to fulfil the purposes outlined in Section 3 of this Notice and to comply with our legal and regulatory obligations.

This will involve retaining some of your Personal Data\* for a reasonable period of time after your policy or your relationship with us has ended or after your claim is closed.

If you would like further information about the periods for which your personal data\* will be stored, please contact us using the contact details in section 1 of this Notice.

We also retain certain limited details beyond the above time periods in order to validate and handle any claims we receive after the statute of limitations has expired (late claims) and any claims we receive where the claimant was not aware of the damage until a long time after it was caused (latent claims). In these circumstances we retain information such as the policyholder's name, the names of any named drivers, policy start and finish dates and cover details.

For late claims we will hold the data for a period of up to 25 years from the lapse or cancellation date of your policy or from the completion of a claim.

For latent claims we will hold the data for up to 60 years from the lapse or cancellation date of your policy. In both cases, the data will only be used in the event that a new claim is made by or against you.

## 8. Your rights to access, correct, delete, portability and restrict the use of your Personal Data\*

As a data subject you have the following rights in relation to how we process your Personal Data\*:

- a. The Right to Withdraw Consent**
- b. The Right of Access:**  
the right to know what data we hold, why we hold it and how we process it
- c. The Right of Rectification:**  
the right to correct any incorrect information we hold about you
- d. The Right of Erasure/Right to be Forgotten**
- e. The Right to Data Portability:**  
the right to get a copy of the information we have about you or have it sent to another Data Controller\*
- f. The Right not to be subject to Automated Decision Making\*, including Profiling**
- g. The Right to Object:**  
the right to stop us Processing\* your data if you do not think we have a good reason for doing so
- h. The Right to Restrict Processing\* of Your Data:**  
the right to restrict the Processing\* of your information, for example while we check the accuracy of your information

### Using your Rights

If you need to use one of these rights please send your request in writing to our Data Protection Officer at:  
Liberty Insurance  
Dublin Road Cavan  
Co. Cavan  
Or email: [DataProtectionOfficer@libertyinsurance.ie](mailto:DataProtectionOfficer@libertyinsurance.ie)

#### **a. The Right to Withdraw Consent**

If we are relying on your consent to allow us to process your information, you can withdraw your consent at any time. From that point on we would no longer be able to carry out the Processing\* we were carrying out with your consent. Any Processing\* we carried out before you withdrew your consent would remain valid.

We do not generally rely on consent for Processing\* Personal Data\*. In relation to the Processing\* of Personal Data\* we carry out in the course of running our business, we generally rely on other legal bases, such as, the basis that the Processing\* is required for the purpose of entering into and performing a contract with you. More details on the legal bases on which we rely are set out in Section 3.

#### **b. Right of Access**

You have the right to be given:

- details about the Personal Data\* we have about you;
- details about why and how we process that data;
- a copy of the Personal Data\* we hold about you.

The above is called a data subject access request, which you can make by contacting our Data Protection Officer.

When you make a Data Subject Access Request please:

- give us as much information as possible to help us identify you (such as your name, address and policy or claim number) and the information you want access to;
- allow up to one month for us to send this information to you;
- note there is no charge, once we do not consider the request to be unjustified or excessive. If we consider a request to be unjustified or excessive we may either deal with the request and charge a fee, or refuse the request. A fee may be applicable if you ask us to send you further copies of the information.

#### **c. Right of Rectification**

You have the right to have us correct any inaccuracies in the information we have about you. In certain cases, it is required by the terms of your insurance policy.

#### **d. Right of Erasure/Right to be Forgotten**

In certain circumstances you have a right to have the Personal Data\* concerning you erased. However, if it is during the term of your policy, then it may affect our ability to provide certain services under your insurance policy.

You can ask us to delete your Personal Data\* where one of the below situations applies;

- a. the Personal Data\* is no longer necessary for the purposes for which they were collected;
- b. where we were relying on your consent to process the data and you no longer consent, and no other legal ground permits the Processing\*;
- c. where you object to the Processing\* and there are no overriding legitimate grounds for the Processing\*;
- d. your Personal Data\* has been unlawfully processed;
- e. your Personal Data\* must be erased for compliance with a legal obligation.

However, your right to be forgotten will not apply in certain circumstances, including where the Processing\* of your data is needed for one of the below reasons;

- a. for exercising the right of freedom of expression and information;
- b. for compliance with a legal obligation, such as the performance of a contract (i.e. your insurance policy or a quote) or compliance with legislation (for example if you are in the Republic of Ireland, the Consumer Protection Code 2012, which requires us to retain data for at least 6 years);
- c. for statistical purposes, where the right to be forgotten is likely to render impossible or seriously impair the achievement of the objectives of that Processing\*; or
- d. for the establishment, exercise or defence of legal claims.

Where you ask for your Personal Data\* to be deleted, we will need to keep a record of your request so we know that the deletion has happened and why, as required by the Central Bank of Ireland. This record will have as much information as possible deleted, as asked for by you, but will correctly show the deletion happened. We will keep the record in such a way as to remove as much of the information you have asked us to delete as possible, while accurately reflecting the activity.

In some cases we may need to keep some information to make sure all of your preferences are properly respected. For example, we cannot erase all information about you where you have also asked us not to send you marketing material. Otherwise, we would delete your preference not to receive marketing material.

### **e. Right to Data Portability**

You have a right to get a copy of your Personal Data\* that you gave us in a structured, commonly used and machine-readable format. You may also ask us to send this Personal Data\* to another Data Controller\* (such as another financial service provider), where technically feasible. Where we do this, we will not be responsible for any action of the other Data Controller\* in respect of the transferred data. This right of data portability only applies to Personal Data\* that we process on the legal basis of consent or for the purpose of entering or performing a contract and where the Processing\* is carried out by automated means.

### **f. Right not to be subject to Automated Decision Making\*, including Profiling**

You have a right not to have decisions made which are based on the Processing\* of your Personal Data\* by a computer only including profiling which has an impact on your legal rights or similarly significantly affects you.

However, there are circumstances where we have the right to use Automated Decision Making\* and profiling. We can only do this where the decision is needed for entering into a contract or for performing that contract (i.e. your policy of insurance or quote) where it is authorised by law or where you have provided your explicit consent.

Where we use Automated Decision Making\* you have the right to have a person involved in the decision making process so that decisions are not based on automated Processing\* alone. You also have the right to give your views on these decisions and to contest these decisions.

### **g. Right to Object**

You have the right to object to the Processing\* of your Personal Data\* which we process on the basis of a legitimate interest. We will then stop Processing\* this Personal Data\* unless we can show compelling legitimate grounds for the Processing\* that outweighs your interests, rights and freedoms or unless we need to use it in relation to legal claims.

If you wish to use this right, please contact us setting out the reason why you want us to stop Processing\* your Personal Data\* based on your particular situation. We will then check whether your rights outweigh our grounds for Processing\* the data.

Please note that if you object to us Processing\* your data, we may not be able to provide certain services or benefits under your insurance policy.

### **h. Right to Restrict Processing\* of Your Data**

In the below circumstances you have the right to restrict the Processing\* of your Personal Data\*:

- a. where you think the Personal Data\* we have is not correct. We will restrict the Processing\* of your Personal Data\* while we check the accuracy of your Personal Data\*;
- b. where the Processing\* is unlawful and you ask that the Processing\* be restricted but you do not want the personal data\* to be deleted; or
- c. where we no longer need the Personal Data\* for the purposes of the Processing\* but you need it for the establishment, exercise or defence of a legal claim

We will also restrict the Processing\* of your Personal Data\* where you have objected to Processing\* under the Right to Object, while we check if your rights outweigh our grounds for Processing\* the Personal Data\*.

When Processing\* is restricted, your Personal Data\* will only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of other people or for reasons of important public interest.

We will tell you before we lift the restriction of Processing\*.

Please note that if you want to restrict the Processing\* of your Personal Data\* while your insurance policy is current, your policy may need to be suspended or terminated. Also, if you are coming near to the end of your policy, and you request to restrict Processing\*, we may not be able to prepare and send you a renewal notice to invite you to renew your insurance policy.

## 9. Automated Decision Making\*

Automated decisions are legal or important decisions that may affect you that are based on Processing\* your Personal Data\* by a computer only. There is no human involvement in making these decisions.

We collect Personal Data\* from you, as part of the quote, inception and renewal process, to include medical and criminal conviction data. We get this data from you, insurance and geographical databases and publicly available information.

Automated decisions to include profiling (described below) are made by us as part of our underwriting process when examining, accepting or declining risks in order to charge an appropriate premium. We use mathematical and actuarial methods of calculating risk to do this.

This information is used to decide a risk rating and will apply to your risk profile to determine your premium. We also engage in profiling for marketing reasons and to report on analytics. Profiling is the Processing\* of your Personal Data\* by a computer, to assess personal aspects about you such as your personal preferences, your location, your interests and your behaviours.

We collect Personal Data\* from you, such as your IP Address\* to better understand your product preferences. This profile is created by putting this Personal Data\* through a computer system that has set parameters. We use this profile to present marketing messages that suit your personal preferences and to report on the type of visitors to our website.

This information is used to decide on the most appropriate marketing offer for you, subject to your preferences. For more information please see Section 11.

Please see Section 8 on what your Personal Data\* rights are and your right not to be subject to Automated Decision Making, including profiling.

## 10. Your Right to make a Complaint

If you want further information about the way your Personal Data\* will be used or if you are unhappy with the way we have handled your Personal Data\* you should contact our Data Protection Officer. You also have the right to lodge a complaint with the Data Protection Commission. Their contact details are as follows:

**Data Protection Commission** (if you are in the Republic of Ireland)  
 21 Fitzwilliam Square South, Dublin 2, D02 RD28.  
 Tel: +353 (0)761 104 800. Tel: +353 578 684 800.  
 Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
 Web: [www.dataprotection.ie](http://www.dataprotection.ie)

Alternatively, you have the right to lodge a complaint with our lead supervisory authority in Spain for cross-border processing activities. Their contact details are as follows:

**Agencia Española de Protección de Datos (AEPD)**  
 C/ Jorge Juan, 6, 28001 Madrid, Spain  
 Tel: 00 34 901 100 099  
 Web: <https://sedeagpd.gob.es/sede-electronica-web/>

## 11. How and why we contact you

### Contacting you

We may contact you with a reminder that your insurance is due to be renewed. This contact may be made by a number of communication methods in addition to traditional correspondence. Where you have told us that you are happy to receive marketing information from us, we will use the details you have given to us to provide you with information about our products and services and those of other companies in the Liberty Mutual Group of companies and other companies whose products and services may interest you.

### How might we contact you?

From time to time we may contact you using the information you have provided in relation to our products and services in any of the following ways:

- by phone;
- by post;
- by email;
- by text message; or
- through digital and/or other remote applications

### Why might we contact you?

- about an enquiry you have made;
- with relevant products or services offers;
- in relation to your policy or quote;
- to ask for your feedback/views on the products and services we provide;
- to tell you about any important changes to our website; or
- where there is another genuine reason for doing so.

### How to Opt out

- You can change your mind about receiving marketing information from us at any time. Each time we contact you electronically with marketing information or a marketing message, you can choose not to receive further marketing information from us to that email address or phone number. This is known as an "opt-out".
- If you wish to "opt-out", please telephone us on 1890 89 1890 or email us at [contact@libertyinsurance.ie](mailto:contact@libertyinsurance.ie).
- Please make sure you tell us about any changes to your marketing preferences for each affected address, email address or phone number you have registered with us.

### Cookies

For further details on our use of cookies, please refer to our Cookie Policy which you can view by visiting [www.libertyinsurance.ie/about-us/cookie-policy/](http://www.libertyinsurance.ie/about-us/cookie-policy/).



## 12. Security

### Fraudulent Emails Warning

We will never contact you by email to request an update of your personal or private information. If you receive any such emails please contact us by telephone immediately.

### Links

Our website links to other websites which are operated and controlled by third parties which may or may not have their own privacy policies and those other websites may link to our website. We are not responsible for privacy practices of third parties including website operators to whom you provide your information. You should read the privacy notices and statements on all third party websites carefully before using them and in particular before providing your information to them.

This Data Protection Notice was last modified 24<sup>th</sup> February 2020.





Liberty Insurance,  
Dublin Road,  
Cavan, Ireland

Tel: 1890 89 1890 (ROI)  
00353 4943 68100 (Int)

[info@libertyinsurance.ie](mailto:info@libertyinsurance.ie)  
[www.libertyinsurance.ie](http://www.libertyinsurance.ie)

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Liberty Seguros, Compania de Seguros Y Reaseguros, S.A, trading as Liberty Insurance is authorised by the General Directorate of Insurance and Pension Funds in Spain and is regulated by the Central Bank of Ireland for conduct of business rules. Liberty Insurance is registered in Ireland, registration number 904632. You can contact the Central Bank of Ireland on 1890 77 77 77.