



Summary Data Protection Notice

June 2021

Summary Data Protection Notice

At Liberty Insurance, we take your privacy seriously and we aim to be clear about how we use Personal Data* relating to you. This Summary Data Protection Notice applies to the processing of personal data in the context of our activities in Ireland and gives you important information about **how** and **why** we process Personal Data*. It includes the requirements of the General Data Protection Regulation*.

This notice applies to all your dealings with us whether online or through offline correspondence. If you are providing information relating to other people such as named drivers* or joint proposers you must ensure you have obtained the permission of any person who is also covered on your insurance and show this notice to them so that they can understand how we process their personal data*. 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.

For more detailed information please see our Data Protection Notice at www.libertyinsurance.ie/GDPR.

The Privacy Terminology Explained section of the Data Protection Notice helps to explain any terms marked with a *, that may be unfamiliar to you.

1. Who we are and how to contact us

When we refer to Liberty Insurance in this Summary Data Protection 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.

You can contact us on 1890 944 412 if you have any questions about how your Personal Data* is processed* by us.

2. Personal Data* we use and where we get this 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. The types of Personal Data* we collect and process about you:

a. Types of Personal Data*	Details
Individual details	Name, address (including proof of address), other contact details, gender, marketing preferences, marital status, occupation, date of birth, financial details, IP address*, GPS co-ordinates, metadata*, vehicle registration number, and family details including their relationship to you.
Identification details	Identification numbers issued by government bodies or agencies, including your PPS Number, (or your National Insurance Number if you are in Northern Ireland or Great Britain) driver identity number, driving licence number, vehicle identification number, passport number and tax identification number.
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, details of any property to be insured (including information about the location of that property), taxation and import status, driving licence, history and experience, your health, or other Special Categories of Data* as explained in more detail below. For more detailed information please see Section 2 of our Data Protection Notice.
Policy information	Information about the quotes you receive and policies you take out.
Claims information	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your relevant criminal convictions, your health (e.g. injuries and relevant pre-existing conditions), incident data or other Special Categories of Data* mentioned above.
Credit and anti-fraud data	Credit history, credit score, sanctions and criminal convictions, and information received from various anti-fraud databases relating to you.
Behavioural Data	Website behavioural data related to your use of Liberty Insurance websites (www.libertyinsurance.ie and www.libertyconnect.ie), to include visited webpages, webpage selections and preferences, web interactions and browsing habits. Email behavioural data relating to what you do with email communications we send you, e.g. whether you open the email or erase it.
Voice	Voice recording.

b. 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:

Special Categories of Data*	Information about your health
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.

c. Where we may collect your Personal Data* from

We may collect your Personal Data* from various sources, including:

- You and the way you interact with us through our website and with emails we send you;
- your family members;
- a joint proposer* or anyone else insured under the policy;
- your insurance broker or intermediary;
- legal representative of a minor;
- your employer or representative which includes anyone who you have authorised to act on your behalf such as a legal representative or a translator;
- anti-fraud databases, court judgements and other databases;
- risk assessment service providers;
- geographical databases and insurance industry bodies and their databases including, Employers' Liability Tracing Office (if you are in the United Kingdom) and Cache (if you are in the United Kingdom);
- the Insurance Link database (you can obtain confirmation on what information is held about you and your previous claims on Insurance Link by visiting www.inslink.ie)
- publicly available information including social media websites and online content, tv, radio and other media content and court judgments;
- third parties including the other party to a claim, witnesses, experts (including medical experts), loss adjusters, repairers, loss assessors, investigators, medical and legal practitioners, an Garda Síochána, the police, and other law-enforcement agencies, claims management firms and solicitors;
- Government agencies, statutory bodies (and their databases including the National Vehicle and Drivers File (NVDF), Motor Third Party Liability Database (MTPL) and the IIDS (Integrated Information Data Service) including the Motor Insurance Bureau of Ireland (we may also get information from the UK entity Motor Insurance Bureau) and the Personal Injuries Assessment Board;
- other insurers;
- 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;
- Your use of www.libertyinsurance.ie and www.libertyconnect.ie; and
- You, when you communicate with us by phone.

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.

For more information on what categories of Personal Data* we collect from what sources, please see Section 2 of our Data Protection Notice.

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

a. Legal basis for processing* your information.

We are required to tell you the lawful reason for processing* your data. These are called the Legal Basis for Processing*. These are:

- a the use is necessary for the performance of your insurance policy or in order to take steps at your request prior to entering the policy (such as providing a quote);
- b the use is necessary to comply with our legal obligations;
- c you have consented to us using your information in such a way;
- d the use is necessary for the purpose of our legitimate interests of managing our business;
- e under Irish Data Protection law we are permitted to use health data in connection with your insurance policy.

We will not prejudice your rights when processing* your information for our legitimate interests, however you have a right to object to us processing* your Personal Data* on this basis if you wish.

b. The purpose of processing* your information. The associated Legal Basis for Processing* (from the panel above) is in brackets beside each.

- To assess insurance needs and the nature and level of risk associated with the proposed insurance policy to determine eligibility and premium (we only use your policy information for this purpose) - (a)
- To verify identity (we only use your individual details for this purpose) - (a, b, d)
- To verify the accuracy of the information we receive (we only use your identification details for this purpose) - (a, b)
- To administer and manage your policy, including automatic renewal of your policy (if applicable to your policy) - (a)
- 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, (For policies beginning with XB/WB, payment card or bank account details provided, as may be updated from time to time, will be stored for up to 2 (two) years from the moment of last use) - (a, b)
- To provide and communicate to you about customer loyalty programmes and value added services - (d)
- To provide you with personalised offers, discounts and information related to our products and services that may be of interest to you or members of your family - (c)
- To carry out marketing and customer research* - (d)
- For staff training, performance reviews, records and discipline - (d)
- To manage and investigate complaints - (a)
- To manage and investigate claims - (a, b, c, d)
- Statistical analyses* - (d)
- For reporting purposes within Liberty Mutual group of companies* - (d)
- For reinsurance* purposes - (d)
- For compliance with all relevant laws and regulations - (b)
- For the purpose of checking vehicle technical information held in the Verisk Insurance Solutions Limited database, in order to offer the most accurate premium (c, d)

- To assist us in fraudulent claims detection - (b, d)
- In order to store Personal Data* - (a, b, d)
- In order to make back-ups of that data in case of emergencies and for disaster recovery purposes - (d)
- To fulfil Liberty Insurance's legitimate interest in assuring information and cyber security, as well as applications performance - (d)
- To facilitate pricing and underwriting analysis related to the location of an insured property - (d)
- To create a customized experience for users of www.libertyinsurance.ie and www.libertyconnect.ie and to allow us to administer our websites - (c, d)
- To issue correspondence and documentation to you in hard copy and digital format - (a, d)
- To respond to your/third party's data subject access request - (b)

The reason (i.e. legal basis) we process your Personal Data* for a particular purpose may be different depending on whether you are a Policyholder*, Named Driver* or Third Party*. For more detailed information about which legal basis we rely on for each type of data subject please see Section 3 of our Data Protection Notice.

c. The purpose for processing* Special Categories of Data* and Criminal Convictions Data. The associated Legal Basis for Processing* (from the panel above) is in brackets beside each.

Special Categories of Data:

- 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 - (d, e)
- To issue correspondence and documentation to you in hard copy and digital format - (a, e)

Criminal Convictions Data (including penalty points):

- For the purposes of assessing your insurance needs, and nature and level of risk associated with your policy - (a)
- For the purposes of fraud detection and prevention, money laundering and other offences - (b, d)
- To issue correspondence and documentation to you in hard copy and digital format - (a)

For the purposes of processing claims - Under Irish Data Protection Law we are permitted to process criminal convictions data in connection with, legal claims, prospective legal claims, legal proceedings or prospective legal proceedings.

4. What if you choose not to provide this information to us?

You are entitled to decide not to provide or to withdraw consent to allow us to process the Personal Data* we need for the purposes listed above. However, you should note that without that Personal Data* we will 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.

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

We disclose your Personal Data* to:

A. take instructions in relation to your Policy:

- We will only take instructions to change a policy from you, your broker, your husband, wife or civil partner or your parent.
- 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 above for our contact details.
- 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.

B. share information as part of the day to day administration of your policy:

We share your information with the following categories of recipients:

- Liberty Mutual group of companies;
- Other insurers/intermediaries;
- Government/Regulatory/Statutory Bodies;
- Law enforcement agencies;
- External Databases;
- Marketing/loyalty and rewards companies;
- Public registers;
- Agents/Service Providers; and
- Other data subjects who interact with you on your phone calls with us, in circumstances where that data subject subsequently exercises their right under data protection law to access that phone call.

For more information on the specific entities we share your information with, please see Section 5 of our Data Protection Notice.

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

Currently, we transfer your Personal Data* as follows:

- Liberty Mutual Technology Group Inc.* (Liberty Mutual Hosting Services) **in the USA and Poland** for securely storing the data;
- Liberty International Holdings, Inc.* **in the USA** for analysing the data;
- Liberty Seguros Compania de Seguros Y Reaseguros S.A. **in Spain, Portugal and in the UK** for cross-border data processing activities, including processing carried out by our call centre;
- Liberty Mutual Insurance Company* **in the USA** for analysing the data;
- Liberty Mutual Group, Inc* **in the USA** for analysing the data and to obtain cyber security services;
- Liberty Seguros S/A **in Brazil** for analysing the data;
- Hughes Insurance Services Limited* **in the UK** for analysing the data;
- Sogeti Ireland Limited/Capgemini **in India and the UK** to obtain software development services;
- Harlosh Limited (t/a Target) and its subcontractor TechMahindra, **in the UK and India** for software development and applications support services.
- EXLService Holdings, Inc. **in India and the USA** for administrative support with centralised finance and billing processes;
- Amazon Web Services Inc. **in the USA** to obtain cloud storage services;
- Microsoft Inc. **in the USA** to obtain cloud storage services;
- Flowfinity Wireless Inc. **in Canada** for data storage services relating to claims administration;
- Those categories of recipients referred to in Section 5 **in UK** to share information as part of the day to day administration of your policy in order to comply with one or more legal obligations and to receive services from those third parties located **in UK** (including Rackspace Limited, a hosting provider);
- Twilio Inc, **in the USA**, as an external service provider for telecommunications and contact centre services;
- PricewaterhouseCoopers LLP and its affiliate PricewaterhouseCoopers Service Delivery Center (Bangalore) Private Limited, **in the USA and India**, for software development services and systems support;
- Cyberscout LLC., **in the USA**, for the provision of cybersecurity services; and
- RR Donnelly UK Limited, **in the UK**, who provide IT services to our service provider Paragon Customer Communications Ireland Limited.

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

We will keep your Personal Data* for as long as reasonably necessary to fulfil the purposes 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*.

You have rights in relation to your Personal Data*. These are:

- **Right of access:** the right to know what Personal Data* we hold, why we hold it and how we process it;
- **Right of rectification:** the right to request us to correct any inaccuracies in your Personal Data*;
- **Right to be forgotten:** the right to have your Personal Data* erased in certain circumstances;
- **Automated decision making*:** the right not to be subject to Automated individual decision making;
- **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*;
- **Right to restrict Processing*:** the right to restrict the processing* of your information, for example while we check the accuracy of your information;
- **Right to object:** where our lawful basis for processing* your Personal Data* is based on our legitimate interests, you have the right to object; and
- **Right to withdraw consent:** the right to withdraw your consent if we are relying on it to process your Personal Data.

For more detailed information on any of your rights please see Section 8 of our Data Protection Notice.

If you need to use one of these rights, please contact our Data Protection Officer by email: DataProtectionOfficer@libertyinsurance.ie or by post: Data Protection Officer, Liberty Insurance, Dublin Road, Cavan, Co. Cavan, or by telephone: 1890 944 412.

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. You have a general right not to be subjected to such an Automated Decision, including any automated profiling.

Automated decisions, to include profiling (described below) are made by us as part of our underwriting process, when examining, accepting or rejecting risks in order to charge an appropriate premium. 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. For more information on how and why we use Automated Decision Making* please see Section 9 of our Data Protection Notice. Where we use automated decision-making you will always be entitled to have a person review the decision so that you can contest it and put your point of view and circumstances forward.

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 always have the right to lodge a complaint with the Data Protection Commission. Their contact details are as follows:

Data Protection Commission,
21 Fitzwilliam Square South, Dublin 2, D02 RD28.
www.dataprotection.ie
Tel: +353 (0)761 104 800 Tel: +353 578 684 800.
E-Mail: info@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
Telephone: 00 34 901 100 099
Web: <https://sedeagpd.gob.es/sede-electronica-web/>

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