



## **DATA PRIVACY POLICY**

**ARAG LEGAL PROTECTION LIMITED**



## ARAG Legal Protection Limited- Data Privacy Policy

ARAG Legal Protection Ltd and any subsidiary companies (“ARAG Group”) are committed to protecting all personal information or data \_we may hold about you.

This Privacy Policy is issued by the ARAG Legal Protection Ltd group of Companies (collectively referred to as “ARAG Group”, “ARAG”, “we”, “us” and “our” in this Privacy Policy) that operate in the United Kingdom and the Republic of Ireland.

This Privacy Policy relates to our use of any personal information we collect from you via the following online services:

- Any ARAG Group website that links to this Policy (“Websites”);
- Social media or ARAG Group content on other websites.

It also relates to our use of any personal information we collect through other means, such as email, in person or other third party sources.

For information concerning ARAG Group please visit <https://www.arag.co.uk/cookiepolicy/>

### Our Approach to Privacy

The privacy and security of your personal information is very important to us. We want to assure you that your information will be properly managed and protected whilst in our hands. Typically ARAG Group acts as Data Controller which means we are responsible for ensuring that your data is collected, processed, secured and retained in accordance with applicable Data Protection Legislation.

### The information we collect and how we collect it

#### Information you provide to ARAG

We may receive personal information about you, when you contact ARAG Group for example by doing any of the following:

- Requesting or obtaining a quote via one of our partners
- Purchasing a ARAG product from one or our partners
- Registering a Claim
- Obtaining legal advice under your policy
- Using our websites
- Entering into competitions
- Telephoning, writing by post or email, or communicating via online channels to ARAG



This information may include:

- Basic personal details such as your name, address, e-mail address, telephone number, date of birth or age, gender, marital status;
- Additional information such as details of your car, your home, your household, your health, injuries you may have suffered, or your travel arrangements;
- Information enabling ARAG to issue quotes, or administer a claim on your behalf;
- Sensitive personal information such as health information (for example medical records, details of existing medical conditions, family or personal history in relation to some medical conditions) or disclosures about criminal convictions. We will always be clear to explain when and why we need this information and the purposes for which we will use it in relation to your claim or services provided by us.
- Information about your employment, including salary;
- Your chosen marketing preferences.
- Telephoning, writing by post or e-mail, or communicating via online channels to ARAG

### [What is ARAG Group's Legal Basis for processing your personal information?](#)

It is necessary for us to use your personal information to perform our obligations in accordance with any contract that we may have with you. It is also in our legitimate interest to use your personal information for the provision of services in relation to any contract that we may have with you.

### [Information collected from your use of our Websites:](#)

#### [Information we collect through Cookies and similar technologies](#)

We collect information through "Cookies" and other similar technologies (e.g. pixel tags or links), to remember you when you visit the Websites and Apps and so we can improve your online experience to suit your needs. These help us understand how you and others use our Websites and Apps, view our products and respond to our advertising, so we can tailor direct marketing and enhance our overall product and service offering. This also saves you from re-inputting information when you return to the Websites or Apps.

When you visit one of our websites we may record your device information including hardware and software used, general location, when and how you interact with our websites and your registration and log-in activity when you use our online platforms. This information is retained and used to note your interest in our Websites and improve customer use experience.

To find out more about Cookies and related technologies please read our separate Cookie Policy.



## Online channels

We may use and share information from or with online sources, such as websites, social media and information sharing platforms. This information may be used to help tailor and improve our services and communicate with you effectively, as we know many of our customers use a range of media channels.

Where we use or share information from or with these sources, we will respect any permissions you have set about how you would like your information to be used.

## Information collected from third parties

We use information about you or the property we insure for you, from publicly available sources.

## How we use information to help you

We may use information to:

- administer quotes and policies;
- administer your policy including updating you on and delivering our services;
- handle your claim;
- deal with your complaint.

## How we use information to improve our products, prices, offers and customer experience

We may also use your information for research or statistical purposes, including to analyse how people use our Websites, view our products, respond to our advertising and to improve our understanding of what customers need.

We may use your information for training purposes, to improve our services and their delivery, for example by recording telephone calls.

## How we share your information outside of the ARAG Group

If you request a quote, or purchase a product or service, your personal information may be shared with and processed by our associated companies, introducers, intermediaries, reinsurers and agents, as well as the policy holder (for a corporate policy) and your broker or agent for the purposes of administration, including third parties providing services to them, (as detailed above).

Your information may be disclosed when we believe in good faith that the disclosure is:

- administer quotes and policies;
- administer your policy including updating you on and delivering our services;
- handle your claim;
- deal with your complaint.

We may share your information with regulatory bodies in the Republic of Ireland or if applicable, overseas, as well as with other insurance companies (directly or via shared databases) to prevent and detect fraud.

### Legal Basis for Data transfer

Your information may be transferred by ARAG Group to another EEA country or outside the EEA, for processing, storage, administration, or any other use stated in this policy. The purposes and processing associated with any such transfer will comply with all applicable data protection regulations, including Data Protection legislation, and with our obligation to adequately protect and secure your personal information. The legal basis for the transfer of data is to pursue our legitimate interests, and or to perform our contract with you. Furthermore, by providing your personal information to ARAG Group you consent to the transfer of your information as described above.

There are certain circumstances where we will transfer your personal data outside the EEA to a country which is not recognised by the European Commission as providing an equivalent level of protection for personal data as is provided for in the EEA. If we transfer your personal data outside of the EEA please rest assured that we will ensure that appropriate measures are in place to protect your personal data and to comply with our obligations under applicable data protection law. This may mean that we enter into contracts in the form approved by the European Commission, or we ensure that the company to which we transfer your personal data has agreed to abide by an approved transfer mechanism, such as the standard contractual clauses (“**SCCs**”) which were [published by the European Commission](#) on June 4, 2021.

### Security

We are committed to protecting the confidentiality and security of the information that you provide to us and we put in place appropriate technical, physical and organisational security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information.

You should also be aware that communications over the internet, such as e-mails, are not secure unless they have been encrypted. For further details on our security details please refer to our Information Security Standards.

### Managing your marketing preferences

We may:

- provide you with updates on ARAG products and services via marketing tailored to you, (e.g. online advertising, social media communications), or by direct marketing (e.g. phone, e-mail, text, post); and
- we will always give you the opportunity to ‘opt out’ of direct marketing when you complete a registration with us, request an online quote, purchase a product or service online or receive any email, text or other direct marketing communication.

You can change your marketing preferences at any other time by e-mailing us at [info@arag.ie](mailto:info@arag.ie).

## [Update your information or change your marketing preferences](#)

Please let us know if your information changes as it is important that the information we hold about you is accurate and up to date.

You can ask us to update or correct your personal information or opt out of ARAG Group's use of your information for direct marketing purposes by contacting us using any of the following method: By e-mail: [info@arag.ie](mailto:info@arag.ie).



## How to find out what information we hold about you

You have the right to request a copy of all the personal information we hold about you in a Subject Access Request.

To do this, simply complete the data request form or write to us at the address below.

We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

## Your rights

Under data protection legislation you may have certain rights relating to your information that ARAG Group processes:

- The right to be informed
- The right of access
- The right to rectification
- The right to erase
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

For any questions or concerns relating to this Privacy Policy or our data protection practices, or to make a subject access request, please contact us using the contact details below.

Data Protection Officer: Michael English  
ARAG Legal Protection Ltd,  
1, Hatch Street Upper,  
Dublin 2  
D02 PY28  
For all e-mail enquiries: [info@arag.ie](mailto:info@arag.ie).

## How long will we retain information about you?

Typically, we retain your personal data for 7 years. We will only retain and use your personal data for the purposes of complying with our legal obligations, resolving disputes, and enforcing our agreements. If you wish to request that we no longer use your personal data, please contact us at [info@arag.ie](mailto:info@arag.ie).



## How to make a Data Protection complaint

If you are unhappy with the way in which your personal data has been processed, you may in the first instance contact Arag's Data Protection Officer using the contact details above.

If you remain dissatisfied, then you have the right to make a complaint to the Data Protection Commission. The Data Protection Commission can be contacted at:

Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
[www.dataprotection.ie](http://www.dataprotection.ie)

## Changes to this Privacy Policy

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal requirements.

You should regularly check this Privacy Policy for updates.

If there will be any significant changes made to the use of your personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our website.

This Data Privacy Policy was last updated on 12<sup>th</sup> September 2022.