

# **FBD Insurance plc**

## **Information and Data Protection Statement**

### **Who are we?**

FBD Insurance plc is a wholly owned subsidiary of FBD Holdings plc. FBD Insurance plc is registered in the Companies Registration Office as number 25475 and authorised as a non-life insurance company. FBD Insurance plc is a member of Insurance Ireland and abides by its voluntary code of conduct. We are registered for Value Added Tax (VAT), registration number 9F72885E.

We are regulated by the Central Bank of Ireland and subject to its codes of conduct, including the Minimum Competency Code 2017 and the Consumer Protection Code 2012. These codes help to protect you and you can view them at [www.centralbank.ie](http://www.centralbank.ie).

FBD Insurance plc is the underwriter of this An Post Insurance Car Insurance policy. Full terms and conditions of the cover you purchase will be outlined in your pre-contract and contract documents. These include your proposal form or statement of fact, policy document, schedule and An Post Insurance Terms of Business.

FBD Insurance plc aims to avoid conflicts of interest, however if a conflict arises we will let you know about it and get your permission before proceeding with any business service. Details of our complaints procedures are outlined in your policy document.

Throughout this document when we refer to 'FBD Group Companies', 'we', 'our' or 'us', we are referring to both FBD Insurance plc and our associated company FBD Insurance Group Ltd trading as FBD Insurance.

### **How will we use your information?**

We will handle, manage and process personal data in line with the data protection statement for FBD Insurance and FBD Insurance plc.

If you have any questions or need more details, you can:

- read our 'Full Data Protection Statement' at <https://www.fbd.ie/dataprotection>;
- email [info@fbd.ie](mailto:info@fbd.ie); or
- write to FBD Data Protection Officer, FBD House, Bluebell, Dublin 12, D12 YOHE, Ireland.

This data protection statement is an overview of our Full Data Protection Statement, which applies to all your dealings with FBD Group Companies.

### **What is 'personal data'?**

Throughout this statement, we refer to your personal data to mean information about:

- you,
- anyone else who is insured under your policy, or
- anyone involved in a claim relating to your policy.

This personal data may also include sensitive data, such as information about a person's health or convictions.

If you give us personal data about someone else, you are confirming that you will explain to them you gave us their personal data. You are also confirming that they understand their data will be processed in the ways set out here and in the Full Data Protection Statement.

### **What personal data do we collect?**

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FBD Insurance plc is regulated by the Central Bank of Ireland.

We may ask for different types of personal data. Examples include:

- **policy data** – title, surname, forename(s), address, phone numbers, email address, previous or existing employment details, occupation, and marketing preference.
- **claims data** – previous or existing claims details, medical information, PPS number and CCTV footage.
- **information from sources other than you** – vehicle details, penalty points, IP address and geocode (precise address location).

Sometimes the data we ask you for may be optional, and we will tell you if this is the case. We will also explain to you any implications of not giving us the data.

### **Why do we collect your personal data?**

Most of the information we ask you for is to assess risk, offer insurance and process claims. We ask you for different types of personal data depending on the kind of insurance you want, or the claim being processed. This allows us to manage your policy, serve you better and uphold the law.

**Manage your policy** - We need to process some personal data to agree and fulfil a contract with you. For example, we do this when we need to:

- verify the accuracy of the information and personal data received;
- assess your insurance needs and the level of cover you need;
- contact or respond to you;
- quote for and manage insurance and other products that we provide to you;
- underwrite policies and handle claims;
- verify and process payments or refunds;
- provide services such as help with car breakdown assistance.

**Serve our customer** - We also need to process personal data where we have a 'legitimate interest' to do so. Legitimate interests include:

- training and monitoring staff in how to perform their duties and serve you as best they can;
- marketing and doing market research and statistical analysis to improve services and products;
- protecting customers and ourselves from being the victims of fraud.

Before we process personal data for our legitimate interests, we carefully consider its effect on you and others. On balance, we believe that the processing we do is necessary and respects your legal rights and freedoms.

**Uphold the law** - We also process personal data to comply with regulatory or legal obligations.

Examples are:

- Conduct of Business requirements
- Money Laundering Acts
- Employment Acts
- Road Traffic Acts
- Finance Acts

### **Why do we need sensitive data?**

We need sensitive information about you and others connected to an insurance policy so that we can:

- offer you the best products and services,
- assess the risk of your proposed policy, and
- assess claims which may relate to medical conditions or information about motoring or criminal charges or convictions.

However, you do not need to give data about 'spent' convictions. These are convictions which, under the Children Act 2001 or Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016,

can be ignored after a set period of time. If you are in any doubt about whether a conviction may be spent, you can contact Citizens Information on 0761 07 4000 or visit [www.citizensinformation.ie](http://www.citizensinformation.ie).

When you give us sensitive data, both you and anyone else on your policy are accepting that the data is necessary for us to provide your insurance. We will only process sensitive data if we have appropriate, suitable and specific measures in place to protect the data and your legal rights and freedoms.

### **Why do you need to give us accurate information?**

If you give us incorrect or out-of-date information, we may not provide you with cover or may have to delay processing your claim. If you give false information and make a claim, it may not be paid and could result in criminal prosecution. To avoid this, you must always give us accurate and up-to-date information, especially when seeking insurance cover or making a claim.

### **How do we collect personal data?**

We collect personal data through your dealings with us or our appointed agents. This may be through websites, contact centres or in person.

We can also get personal data from other sources. Examples include vehicle databases, Insurance Link (a central claims database for the insurance industry – see <https://www.inslink.ie>) and public social media sites. We use these sources to help us gather and verify personal data or other information you have provided.

### **How do we collect personal data about children?**

If you give personal data about a child under the age of 16 years, we will need to check that you are their parent or guardian. We do this to make sure you can authorise us to process personal data about the child.

### **How long do we keep personal data?**

We hold personal data in line with our record retention policy. For most policies, this is seven years after your relationship with us ends. If you do not accept a quote or complete an application for an insurance policy, we will keep your data for 15 months. We will process the data in line with the data protection information outlined in this document.

If there is a claim or a potential claim against a policy, we hold the data for at least seven years after any legal proceedings or potential legal proceedings have been finalised. For more information, please see Section 9 of our Full Data Protection Statement which is available at <https://www.fbd.ie/dataprotection>.

### **Do we assess personal data using automated tools?**

Yes. When you ask about a product or service or submit a claim, we use automated procedures to assess your personal data and reach a decision. This is sometimes called 'profiling' or 'automated decision-making'. For example, if you ask for a quote, we will put your data through a computer program to calculate risk. Based on this, we may decide to offer or not to offer you a particular product.

If you want more information or would like a decision reviewed, please call 1800 617 617.

### **Do we share personal data?**

To provide insurance cover or to process a claim, we may have to share your personal data with others. These may include employees or agents, service providers, reinsurance companies, trade bodies, private investigators, professional advisors and others involved in administering or processing your data.

To fulfil our regulatory, industry or legal obligations, we may also pass your personal data to external databases. For example:

- The National Fleet Database, a database of insured vehicles; or
- Insurance Link (<https://www.inslink.ie/>), a database of claims data which can include name, address, date of birth, type of injury or loss suffered, and property damaged.

Personal data on Insurance Link may be shared with other insurance companies, self-insurers or statutory authorities. These third parties may keep their own record of personal data obtained from Insurance Link. See the Full Data Protection Statement on <https://www.fbd.ie/dataprotection> for more details.

### **Will we contact you for marketing?**

No. If you have arranged your insurance through An Post Insurance, we will not collect marketing consent from you and FBD's direct marketing practices will not apply to you.

### **What are your data protection rights?**

You have a number of rights when it comes to personal data. These may include the right to:

- be told if we hold personal data about you;
- correct your personal data;
- ask for a copy of your personal data;
- object to the use of your personal data;
- ask us to delete your personal data;
- restrict the use of your personal data; or
- send and receive personal data electronically.

Some of these rights only apply in certain situations. For more information, please see Section 13 of our Full Data Protection Statement on <https://www.fbd.ie/dataprotection>.

If you want to use your data protection rights, please write to FBD Data Protection Officer, FBD House, Bluebell, Dublin 12, D12 YOHE, Ireland. We will reply as quickly as possible and, at the latest, within 30 days of receiving your request. In certain instances, this may be extended up to 60 days. We will tell you about this before making an extension.

You also have a right to lodge a complaint about the processing of your personal data with the Office of the Data Protection Commissioner:

- email: [info@dataprotection.ie](mailto:info@dataprotection.ie);
- write to: Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28; or
- phone: 076 1104800.