

## nRSA Data Protection Notice

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We are committed to ensuring that your data is protected. This Notice specifically deals with a situation where you are making a claim either as a person who holds a policy with RSA or are making a claim against an RSA policyholder.

### 1. Who are we?

We are RSA Northern Ireland Insurance Limited, part of the RSA Insurance Group. We provide commercial and consumer insurance products and services on behalf of Royal & Sun Alliance Insurance plc and RSA Insurance Ireland DAC. We also provide insurance services in partnership with other companies.

### 2. Why do we collect and use your personal information?

If you are an existing policyholder RSA will already have obtained personal data from you in order to provide you with a quotation and for the provision of insurance services in relation to your policy. In order to claim against your insurance policy, we normally need to collect information that evidences what happened in the incident, what losses you have suffered and this may, for certain policies, include sensitive data such as details of the injuries you have sustained.

If you are making a claim against an RSA policyholder we normally need to collect information that evidences what happened in the incident. We will also need to obtain details from you regarding the losses that you have suffered and this may include sensitive data such as details of the injuries you have sustained.

This information may be shared with other selected companies as part of the claims handling process. See Section 4 for further detail.

Data protection laws require us to meet certain conditions before we are allowed to use your personal information in the manner described in this Notice. We take our responsibilities under data protection laws very seriously, including meeting these conditions.

In order to provide you with this detail we have prepared the following which describes the purpose to which we are using your data in relation to our handling of claims and the legal basis for doing so.

| Purpose  | Legal Basis  |
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| To verify your identity and to verify the accuracy of the information we receive.  | Processing is necessary for the performance of a contract.<br><br>To comply with legal obligations.  |
| To manage and investigate any claims made by you or another person under a policy of insurance.  | Processing is necessary for the performance of a contract.   |
| To make and receive any payments in relation to a claim.   | Processing is necessary for the performance of a contract.   |
| To detect and prevent fraud and other offences. To assist The Police Service of Northern Ireland or any other authorised body with investigations. | Processing is necessary for the purposes of our legitimate interests. This interest is to investigate and prevent potential fraudulent and other illegal activity. |

| Purpose                                   | Legal Basis   |
|---|---|
| To manage and investigate any complaints. | Processing is necessary for the performance of a contract.<br><br>Processing is necessary to comply with legal obligations. |
| To comply with laws and regulations.      | Processing is necessary to comply with legal obligations  |
| For reinsurance purposes.                 | Processing is necessary for the performance of a contract   |

### 3. Where else do we collect information about you?

Where possible, we will collect your personal information directly from you. However, on occasion we may receive information about you from other people or companies. For example, this can occur in the following situations:

- It was given to us by someone who is handling a claim on your behalf (e.g. a solicitor or insurance broker).
- It was given to us in the course of incident investigation (e.g. by The Police Service of Northern Ireland).
- Claims databases available to the insurance industry.
- Searches of publicly available information (e.g. online).
- It was lawfully collected from other sources (e.g. The Motor Insurers' Bureau (MIB)).
- Motor Insurers Anti-Fraud and Theft Register (MIAFTR), The Claims and Underwriting Exchange (CUE) and other insurers.
- Ministry of Justice Claims Portal.
- Other fraud prevention databases available in the insurance industry.

### 4. Will RSA share your personal information with anyone else?

We may share your details with or seek information from a number of external parties such as:

- Your Intermediary, your solicitor & anyone authorised by you to act on your behalf,
- Our Third Party Service Providers such as technology suppliers, hosting/storage providers, payment providers and document providers.
- Loss Adjusters, claims investigators, repairers, medical practitioners, solicitors and other firms as part of the claims handling process.
- Other companies within the RSA Insurance Group.
- Motor Insurers Anti-Fraud and Theft Register (MIAFTR), The Claims and Underwriting Exchange (CUE) and other insurers.
- Private Investigators when we need to further investigate certain claims.
- Other fraud prevention databases available in the insurance industry.
- Our reinsurers.



We may also share your personal information as a result of our legal and regulatory obligations. This can include with The Police Service of Northern Ireland, other official agencies and on foot of a Court Order or Subpoena.

In order to provide you with the insurance policy, we may share your information with our service providers and on occasions, some of your personal information may be sent to other parties outside of the European Economic Area (EEA). We would only do this in compliance with the appropriate legal and technical safeguards such as the standard data protection clauses adopted by the European Commission, Binding Corporate Rules or as a result of an adequacy decision of the European Commission.

5. For how long will RSA keep your information?

All information in respect of a policy (to include claims on a policy) will be held for 7 years after the ending of the client/insurer relationship to ensure we meet our regulatory obligations. We will retain call recordings for 8 years from the date of the call.

6. What should you do if your information is incorrect?

If you think that the information we hold about you is incorrect or incomplete, please contact us and we will be happy to rectify it for you.

7. What are your rights over the information that is held by RSA?

We understand your information is important to you, therefore you may request us to undertake any of the following actions:

- 1 Provide you with the personal information we hold about you, in a commonly used electronic format (or hard copy if you wish).
- 2 Request your personal information to be deleted where you believe it is no longer required. Please note however, this request will not be valid while you are still insured with us and where we are subject to legal or regulatory obligations.
- 3 Request that we supply the personal information you have supplied to us, to another company. We would provide the information in a commonly used electronic format.
- 4 Request to restrict the use of your information by us.
- 5 Object to the processing of your data.

If you would like to request any of the above, please email us a request to [DPO@ni.rsagroup.com](mailto:DPO@ni.rsagroup.com) or write to us at the address contained in Section 9. To ensure that we do not disclose your personal information to a party who is not entitled to it, when you are making the request please provide us with:

- Your name;
- Address(es);
- Date of birth;
- Any policy IDs or reference numbers that you have along with a copy of your photo identification and proof of address.

All requests are free of charge although we reserve the right to charge an administrative fee for subsequent requests (such as when the request is part of a series of repeated requests over a short period of time). We endeavour to respond within one month from receipt of the request. If we do not meet this time frame, we will explain why this was in our response.

Please note that simply submitting a request does not mean we will be able to fulfil it – we are often bound by legal and legislative law which can prevent us fulfilling some requests in their entirety, but when this is the case we will explain this to you in our response.

Requests to restrict the use of your information or to object to the processing of your data may lead to RSA being unable to continue to deal with your claim or to service your policy and therefore lead to cancellation of your policy.

#### 8. Changes to our Data Protection Notice.

This notice will be updated from time to time so please check it each time you submit personal information to us or renew your insurance policy.

#### 9. How do you ask a question about this Data Protection Notice?

If you any questions or comments about this privacy notice please contact:

The Data Protection Officer, RSA NI Insurance Limited, Law Society House, 90-106 Victoria Street, Belfast,

BT1 3GN.

You may also email us at [DPO@ni.rsagroup.com](mailto:DPO@ni.rsagroup.com)

#### 10. How can you lodge a complaint?

If you wish to raise a complaint on how we have handled your personal information, please send an email to [DPO@ni.rsagroup.com](mailto:DPO@ni.rsagroup.com) or write to us using the address provided in Section 9. Our Data Protection Officer will investigate your complaint and will give you additional information about how it will be handled. We aim to respond in a reasonable time, normally 30 days.

If you are not satisfied with our response you can lodge a complaint with The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.