



RSA Northern Ireland Data Protection Notice

At RSA, we're committed to ensuring that your personal data is protected. This Notice explains how we use the information we collect about you and tells you about your data protection rights.

1. Who are we?

Where we refer to "we" "us" "our" we mean RSA Insurance Ireland DAC UK Branch a branch of RSA Insurance Ireland DAC and part of the Intact Financial Corporation ('Intact'). We provide commercial insurance products and services. We also provide insurance services in partnership with other companies. We are a Data Controller in relation to your personal information. Our contact information is in Section 9 below.

2. What information do we collect about you and why?

We use your personal information to provide insurance services such as giving a quote, underwriting a policy and handling claims under an insurance contract. We also use your personal data for related matters such as complaints handling, prevention or detection of fraud, for reinsurance purposes and statistical analysis.

The following (non-exhaustive) categories and types of personal information that we may collect and use about you (or other people to be insured) includes:

Policy Information: name, address, postcode, contact details, phone numbers, date of birth, occupation, policy numbers, gender, driving licence details and penalty points information, vehicle details, renewal dates of policies with other insurers, bank and payment card details, claims data, health data, images, vulnerability data (more information below), call recordings, VAT or other relevant tax numbers, customer survey responses, geo-location and driving behaviour data.

Claims Information: claim circumstances, health data (see below), criminal conviction data (see below), call recordings, voice and images (e.g. CCTV, photographs, dash cam and other video or voice recordings), details of damaged property, estimates, costs, payments, recoveries, PPS number / national insurance number, VAT number/status, details of services provided to you as part of claims.

Information from Other Sources: Penalty points, address look up, car details and history, GPS tracking (where you've a motor product which features this), claims history, sources such as Motor Insurers Anti-Fraud and Theft Register and the Claims and Underwriting Exchange, online information. Section 3 has more detail.

Health Data: medical and health information, vulnerability data related to health (more information below).

Criminal Conviction Data: driving offences and conviction history.

Marketing Preferences: whether you want us to send you news and offers related to products and services.

Online Information: information collected through website cookies and other similar technologies (e.g. pixel trackers or 'like' buttons) when you visit our website or use one of our mobile Apps, such as on-line identifiers like IP addresses.

Note: You don't have to provide us with any personal information, but if you don't provide certain information that we need then we may not be able to proceed with your application for insurance, continue your policy or progress a claim that you make. We will let you know what information is required to proceed with your application or claim.

When looking for an insurance quote from us, you will need to provide us with information relating to what you wish to be insured (e.g. car make/model, your home, details about you or other people to be insured). When buying certain products, we may need to collect special categories of data (e.g. medical or health information) and driving offences or convictions history. If you become vulnerable, due to a life event, health issue or other matter, we will seek to identify this and decide what additional support we can provide, so we can meet your needs and fulfil our obligations to you. To provide our products, we will also need to process your payment information (e.g. bank account details, credit and debit card details) to collect payments from you and to issue any refunds to you.

We may need to contact you if you request a quote from us and/or to service your policy. This may be done via your intermediary (if applicable), through our/their website (including digital chat media), by email, SMS, mobile Apps, telephone calls and/or by post. Telephone calls and the other ways we contact you may be recorded for quality assurance, training, verification and security purposes.

If you need to claim under your insurance policy, or if you are making a claim against an RSA policyholder, we normally need to collect information that evidences what happened in the incident. If other people are involved in the incident, we may also need to collect additional information related to them (including children) which can include special categories of data (e.g. injury and medical information).

When applying to us for an insurance policy, you may need to provide us with information relating to other people insured under the policy (or later if there's a claim). You agree that you will bring this Notice to the attention of each person named on the policy at the earliest possible time. Ensure that anyone else who is insured under your policy or may be a beneficiary (e.g. arising from a claim settlement) has agreed to provide their personal information to us.

Secondary processing of your personal information (i.e. for a purpose other than for which it was collected) may occur but only in accordance with data protection laws, e.g. where necessary and proportionate for the purposes of preventing, detecting, investigating or prosecuting criminal offences, or for the purposes of legal advice and legal proceedings.

This table describes the purposes for which we use your personal data (from Section 2) and the legal basis for doing so.

Purpose	Legal Basis
To provide you with an insurance quote and to provide you with insurance cover if you decide to buy a product.	Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.
To assess the information you have provided and decide whether we can provide you with cover and at what price.	
To verify your identity and to verify the accuracy of the information we receive.	Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract. Processing is necessary for the purposes of our legitimate interests to investigate and prevent potential fraud. Processing is necessary to comply with legal obligations e.g. Financial Sanctions obligations.
To administer your insurance contract and make any changes during its term, answer queries, provide updates and process a cancellation.	Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.
To arrange any payments in relation to your policy or a claim.	
To manage and investigate any claims made by you or another person under your policy of insurance, or by you as a Third Party against our policyholder including for the defence of legal proceedings.	Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract. Processing is necessary for the purposes of our legitimate interests. The interest is to manage our business.
To detect and prevent fraud, money laundering and other offences. To assist The Police Service of Northern Ireland or any other authorised law enforcement body with their investigations.	Processing is necessary for the purposes of our legitimate interests to investigate and prevent potential fraudulent and other illegal activity. Processing is necessary to comply with legal obligations.
To manage and investigate any complaints.	Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract. Processing is necessary to comply with legal obligations e.g. FCA Handbook obligations.
For reinsurance purposes.	Processing is necessary for the purposes of our legitimate interests in protecting ourselves from excess losses due to high exposure.
To comply with laws and regulations.	Processing is necessary to comply with legal obligations.
For statistical analysis including internal risk assessment, portfolio performance reporting or market-level research exercises or for customer satisfaction surveys.	Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products and services.
For quality assurance, training, records maintenance, security and verification purposes, for example the recording or live monitoring of telephone calls.	Processing is necessary for compliance with our legal obligations e.g. FCA Handbook obligations.
For staff training, performance reviews and internal disciplinary purposes.	Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products, and services.
For the ongoing development, testing and security of our IT systems; to make back-ups of data in case of emergencies and for disaster recovery purposes.	Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract.
	Processing is necessary to comply with legal obligations e.g. FCA Handbook obligations.
	Processing is necessary for the purposes of our legitimate interests. The interest is to protect and to ensure the continuity of our business.

To develop and improve how our machine learning, artificial intelligence and statistical modelling tools work.	Processing is necessary for the purposes of our legitimate interests. This interest is to improve our processes, products, and services.
To issue service-related communications to you such as policy renewal reminders, policy cover reminders, new website and customer service features or adverse weather alerts.	Processing is necessary for our legitimate interests. This interest is to communicate important information to you to ensure continuity of cover, awareness of policy cover, new service features and to help safeguard your property.
Some cookies are essential to operate our websites and Apps. Other optional cookies are used by us and our third-party service providers to help improve our and their products and services, functionality and performance of our websites and Apps, and to support effective advertising. For further information please see our Cookie Policy .	Processing is necessary for the performance of a contract or to take steps at your request prior to entering into a contract (i.e. use of cookies which are essential or strictly necessary to provide you with the service which you have requested). Processing is based on your consent.

3. How 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 sources. For example:

- It was given to us by someone who is applying for an insurance product or submitting a claim on your behalf (your insurance broker/ intermediary, spouse or partner).
- It was supplied to us when you purchased, or sought to purchase, an insurance product or service that is provided by us in partnership with other companies.
- Other companies within the Intact Group.
- In the event of a claim or incident it was given to us by involved third parties or by witnesses to the incident.
- From experts or professionals during the claims process e.g. legal representatives, medical professionals, loss assessors, loss adjusters, accident and private investigators, motor repairers, motor engineers, car hire providers, expert appraisers and salvage providers.
- It was lawfully collected from other sources such as the Motor Insurers' Bureau ('MIB').
- From other vehicle history check suppliers/databases.
- Through credit history checks.
- Through geocoding databases used to determine location-based risk factors.
- From searches of open source and publicly available information (e.g. social media platforms and on-line content, court judgements, electoral registers etc).
- From the Motor Insurers Anti-Fraud and Theft Register ('MIAFTR'), the Claims and Underwriting Exchange ('CUE') and from other insurance companies and from other fraud prevention databases and data enrichment services available in the insurance industry. The aim of this is to help us to check information for fraud.
- Personal data collected through website cookies processing e.g. IP address.

4. Will we share your personal information with anyone else?

We may share your details with other third parties (e.g. service providers, data processors, other data controllers) to administer your policy, handle and validate claims, prevent and detect fraud, comply with laws and regulations and to conduct internal or market level research analysis. For example, with:

- Your Intermediary and anyone authorised by you to act on your behalf.
- Our third-party service providers such as our information technology suppliers, cloud service providers, data storage providers, payment services providers, documentation fulfilment providers and companies that deliver policy benefits, such as breakdown assistance.
- Other companies within the Intact Group.
- The Motor Insurers' Bureau ('MIB'), the Motor Insurers Anti-Fraud and Theft Register ('MIAFTR'), the Claims and Underwriting Exchange ('CUE'), Employers Liability Tracing Office ('ELTO') and with other insurance companies and industry bodies.
- Loss adjusters, motor repairers, car hire providers, medical practitioners, solicitors, expert appraisers and other firms as part of the claims handling process.
- Private Investigators and Claims Investigators when we need to further investigate certain claims.
- Property and Risk Surveyors.
- Other fraud prevention databases and data enrichment service providers available in the insurance industry.
- In the event that we may be taken over, or sell any business or assets, in which case we will disclose your personal information to the prospective buyer of such business or assets.
- Reinsurers (and brokers of reinsurers) who provide reinsurance services to us.
- Third party claimants or their legal representatives during the administration of a claim being made against you.

- Law enforcement agencies and government departments including the Financial Conduct Authority, the Financial Services Ombudsman, The Police Service of Northern Ireland, the Information Commissioners Office - as a result of our legal and regulatory obligations or on order of a Court Order or Subpoena.
- Our trusted partners, and with third parties where personal data is processed via the use of cookies or other similar technologies for specific purposes. For more information about how and why we use cookies, please visit our [Cookie Policy](https://rsagroupni.com/) on our website (<https://rsagroupni.com/>).

Sometimes the parties we share information with (including transfers within the Intact Group) may be located outside of the UK or the European Economic Area ('EEA'). We will only do this by reliance on an approved 'transfer mechanism' such as European Commission / UK Information Commissioner's Office adopted Standard Contractual Clauses, (typically Module 1 and 2, which allow for transfers from Controllers in the UK or EEA to Controllers or Processors outside the UK or EEA), such as to India and the United States of America. We also rely on Adequacy decisions of the European Commission and the UK (including in relation to Canada). If you want more detail, please get in touch using the contact information below.

5. Profiling, automated decision making and data analytics

We may conduct the following activities, which involve profiling and automated (computer based) decision-making:

- Insurance involves assessing risks, making determinations as to whether to accept or reject risks and charging the correct premium for each risk. When you apply for insurance, we may use Pricing and Underwriting engines and algorithms to create risk profiles about you and to make fully automated decisions – this involves processes which calculate the insurance risk based on the information you have supplied or that we have collected about you.

The results of these processes will be used to assess your individual risk and to determine if we can provide, or continue to provide, you with a policy, to decide its terms and to calculate the premium you have to pay. If you do not agree with the result, you have the right to request human intervention to allow you to express your point of view, to obtain an explanation of the decision reached and to contest the decision.

In respect of Claims, we may use profiling or automated processing to identify if your claim presents a higher risk of fraud (but these processes do not involve decisions being made solely based on automated decision-making).

6. How long will we keep your personal information?

In general, we will retain your personal information for 7 years from the date of cancellation of your policy or the closure/settlement of your claim. Quote information (where a policy is not taken out) is generally retained for 6 months. We generally retain call recordings for 7 years from the date of the recording to comply with our regulatory obligations. There may be reasons why we need to retain your personal information for longer periods, for example in the case of employer's liability insurance and subsidence matters, or to comply with our legal and regulatory obligations.

7. What are your Rights?

You have legal rights under data protection law in relation to your personal information:

- 1) **Right to Rectification:** Correct any information we hold about you if you think it's incorrect or incomplete.
- 2) **Right to Erasure:** Request your personal information be deleted where you believe it's no longer required. We may not always be able to do this, for example, while you're still insured with us or where we need to keep your personal data to meet legal or regulatory obligations.
- 3) **Right of Access:** Provide you with a copy of the personal information we hold about you.
- 4) **Right to Portability:** Request that we transfer a machine readable copy of the personal information you have given us, to another company.
- 5) **Right to Restriction:** Request that we restrict our use of your personal information in certain circumstances.
- 6) **Right to Object:** Object to the processing of your personal data for marketing purposes or for any purpose where processing (including profiling) is necessary for the purposes of our legitimate interests (see table above).
- 7) **Right to Withdraw Consent:** To withdraw your consent at any time, where your consent is our basis for using your data (see table Section 2 table) without affecting the lawfulness of processing before consent is withdrawn.
- 8) **Right to Contest Decisions:** To contest decisions based solely on automated decision making, obtain an explanation of the decision reached, express your point of view, and ask for human intervention.

Please note that requests to object to or restrict the use of your personal information may lead to us being unable to continue to service your policy and lead to cancellation of your policy.

If you would like to request any of these Rights, please email us at ni_dataprotection@ie.rsagroup.com or write to us at the address in Section 9 of this Notice. When you're making the request please provide us with your name, address, date of birth and any policy numbers that you have. You may need to provide us with a copy of your photo identification to ensure we do not provide your personal information to anyone that is not entitled to it.

All requests are free, unless we think your request is manifestly unfounded or excessive in nature. We aim to respond within one month from receipt of your request. If we cannot, due to the complexity or repeated nature of a request, we will let you know as soon as possible and explain the reason for this.

Submitting a request does not mean we will be able to complete it or complete it fully. We are often bound by legal and regulatory obligations or may rely on a lawful exemption which restricts the scope of our obligations as a Data Controller. When this is the case, we will explain this to you in our response, and that you can lodge a complaint with the Data Protection Commission or bring the matter to Court.

8. Changes to our Data Protection Notice

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

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

If you have any questions this Notice please contact: The Data Protection Officer, RSA Northern Ireland, Artola House, 91-97 Victoria Street, Belfast, BT1 4PB, Northern Ireland. You may also email us at ni_dataprotection@ie.rsagroup.com.

10. How do you Complain?

If you're unhappy and want to complain, please contact us at ni_dataprotection@ie.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 the complaint process. We aim to respond in a reasonable timeframe, normally within one month.

If you're not satisfied with our response you can contact the Information Commissioner's Office:

Post: Information Commissioner's Office, 10th Floor, Causeway Tower, 9 James Street South, Belfast, BT2 8DN
Phone: 0303 123 1114
Email: ni@ico.org.uk
Web: <https://ico.org.uk/about-the-ico/who-we-are/northern-ireland-office>

11. Representatives

The General Data Protection Regulation ('GDPR') requires organisations not established in the European Union ('EU') to designate an EU representative if they're subject to the GDPR, for example offering products/services to EU citizens.

As we and Intact may undertake processing to which the EU GDPR applies and do not have an establishment in the EU, we have appointed EU representatives who you may address any issues and/or queries you may have relating to our processing of your personal data and/or with this Notice more generally. Our EU representatives will also deal with data subject rights requests for EU citizens and enquiries by EU supervisory authorities on our behalf. Our EU representative is RSA Insurance Ireland DAC and can be contacted at ie_dataprotection@ie.rsagroup.com. Intact have appointed RSA Luxembourg S.A to act as their EU representative and can be contacted at rsa.dp@eu.rsagroup.com.

This Notice is effective from January 2024.

RSA Insurance Ireland DAC UK Branch trading as RSA Northern Ireland is authorised and regulated by the Central Bank of Ireland. Authorised by the Prudential Regulation Authority. Subject to regulation by the Financial Conduct Authority (209283) and limited regulation by the Prudential Regulation Authority. Details about the extent of our regulation by the Prudential Regulation Authority are available from us on request. The branch registered office is Artola House, 91-97 Victoria Street, Belfast BT1 4PB, and is established in the UK under company number BR022229.