

# PRIVACY POLICY

White Horse Insurance Ireland dac understands and respects the importance of protecting your personal data. This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, in respect of your relationship with us as a customer or a potential customer. This information may be collected via our websites (“Sites”), through our call centres or stores, our mobile applications (“Apps”), our questionnaires/surveys, or our social media channels (collectively, our “Services”).

Please read the following information carefully.

**Please Note:** You are responsible for ensuring that any other people that you are acting on behalf of (such as those included with you on an insurance policy), are aware of the content of this Privacy Policy and you have checked with them that they agree to their personal data being provided to us, on their behalf.

By purchasing from us or otherwise providing your personal data to us, we will transfer, store or process it as set out below. We will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

## 1. Which companies does this policy apply to?

**White Horse Insurance Ireland dac underwrites your insurance policy, but a number of other companies distribute the insurance policies underwritten by us. This policy covers the data that we hold about you. Read on to find out more....**

This Privacy Policy applies to the insurance and associated services provided by White Horse Insurance Ireland dac (“we”, “us”, “our”) as a data controller (please see ‘**How to Contact Us**’ below for our registered address) and our subsidiary, White Horse Administration Services Limited (“we”, “us”, “our”) who process data on our behalf. Additional data controllers may include third parties/brokers who are responsible for the sale and distribution of our insurance products and these third parties will have their own privacy policies.

## 2. What types of personal data do we collect about you and why do we collect it?

**We collect and use certain personal data about you and about any other person you include on your policy. The sort of personal data we collect is information that you provide to us, that we collect from you or observe about you, or that we obtain from other sources. Read on to find out more...**

## Personal data you give to us

- When you buy an insurance policy or seek an insurance quotation from us, we will ask you for your personal information which may include your name, address, e-mail address, telephone number, date of birth, bank account details or payment card details, security questions and certain other information (such as destination of travel). In addition to collecting personal information about you, we may also collect personal information about other people you wish to insure on the policy. We need to collect this information in order to provide the products and other services you are requesting. Where you have bought your insurance from a third party distributor, we will receive these details directly from the third party.
- Particularly in relation to insurance products, we may ask you for information about medical or other health conditions and disabilities about the person who is being insured, their family members and other persons to be insured on the policy. We need to collect this information in order to provide you with a quote for insurance, to arrange the insurance contract and to deal with claims. This information is referred to as 'special category' personal data and when you give us this information, we will use it to try to ensure your particular needs regarding proceeding with an application or any claim are met. We may have to share that data with our third-party suppliers and transfer it outside the UK, EU or European Economic Area (EEA), as described in this Privacy Policy. When we do this, we will ensure that we transfer the data securely and according to regulatory requirements. If you do not want to provide this information to us, or after you have provided us with this information, you ask us, or our compliance department, to stop processing this information, it may mean we will not be able to provide all, or parts, of the services you have requested.
- Personal information required to be collected for the purposes of handling, investigating and/or paying insurance claims from you and any relevant insured parties.
- If you enter a competition or promotion, complete a survey, or if you report a problem with any of our Services, we will collect your name and relevant contact information and any other personal information you choose to give us.
- If you contact us online, we may keep a record of your e-mail or other correspondence, and if you contact us by telephone, we may monitor and/or record phone conversations. The monitoring and recording of telephone calls ensures that we have an accurate record of instructions and information provided to us, for training purposes, to assist in the resolution of complaints, to improve our customer service and to prevent or detect fraud.
- If, when using our Services, you search on our website or provide any of your personal data (including telephone number or e-mail address), but do not make a purchase, we will keep and use the data you've provided for a limited time and purpose, as outlined below.

To help us keep your information current, accurate and complete, please ensure you tell us if anything needs to be changed.

### **Personal data obtained from other sources**

We may also receive your personal data from third party sources who collect information about you. This includes:

- For insurance policies where there is more than one person insured on the same policy, we may obtain personal information about you from any of the insured parties on your policy.
- From fraud prevention agencies or from other companies such as other insurance undertakings where we are investigating suspected fraud.

### **3. Where your data is stored and who it's shared with?**

**Your personal data is held on a combination of our own systems and systems of the suppliers we use to provide our services. Read more here...**

When you give your personal data to us, some personal data will also need to be provided to and processed and stored by relevant third parties. These third parties include:

- our product partners and data processors (companies that act as service providers under contract with us and only process your personal information as instructed by us).
- our distribution partners/brokers, where sales of insurance are underwritten by us.
- claims handlers and emergency assistance providers for the purposes of handling, investigating and/or paying insurance claims to provide you with the arrangements and assistance you require.
- our card payment facilitators and other relevant third parties such as fraud investigators, that help us process customer payments or assist us in detecting and preventing fraudulent payments or claims.
- regulatory authorities and state organisations e.g. the Central Bank of Ireland, Financial Services and Pensions Ombudsman, relevant tax authorities or law enforcement authorities/agencies.
- other insurance companies where there is shared liability as part of an insurance claim including for recoveries or for the prevention or detection of fraud.
- reinsurers, where we are required to pass on information for underwriting or claims purposes.
- service providers acting for us such as IT suppliers, actuaries, auditors, lawyers, data storage companies.
- healthcare practitioners and medical institutions.
- anyone with authorisation or permission to act on your behalf about your insurance policy or claim (including other relevant individuals under a policy). This includes legal representatives and medical practitioners.

Some of these third parties may be based outside of the UK, EU and European Economic Area (“EEA”). Organisations that are based outside of the UK, EU or EEA may not be subject to the same level of controls in regard to data protection as those that exist within the UK, EU and the EEA. We aim only to transfer your data to third parties outside of the UK, EU or the EEA where either:

- (a) your personal information will be subject to one or more appropriate safeguards set out in the law; if you’d like more information about our safeguards, please contact us. These safeguards may be the use of standard contractual clauses in a form approved by regulators, or having our suppliers sign up to an independent privacy scheme approved by regulators (like the US ‘Privacy Shield’ scheme);
- (b) the transfer is necessary to enable your contract to be performed;
- (c) your consent has been obtained; or
- (d) on the basis of necessity for the protection of your vital interests or those of another natural person (e.g. where there is a serious risk to life).

#### **4. How do we use your information when providing our services to you?**

**In order to provide our services to you, we use the information we hold in a number of different ways. Read more here.....**

We may use and process your personal information (including special category data such as information on your health specifically for insurance purposes) **where we have a specific legal basis to do so** under applicable national law.

In certain jurisdictions, we rely on local Data Protection Law that allows us to use **health data** in connection with your insurance policy - we may need to use health data for the purposes of providing quotes, processing claims, fraud investigation and handling any complaints you may have.

The following activities are carried out by us using your personal data as it is **necessary in relation to a contract** which you have entered into or because **you have asked for something to be done so you can enter into a contract;**

- To provide you with a quotation for an insurance product;
- Providing the services internally and through our suppliers, to ensure the services you have requested are arranged, including claims-handling and related activities;
- To communicate with you regarding your insurance contract, making any changes, answering queries, providing updates, carrying out renewal of insurance policies.

### **Automated decision making**

We may use automated decision-making for medical screening purposes where we need to make an assessment of risk for certain pre-existing medical conditions. This means that your personal data (including special categories of personal data), such as your age and your medical history (as provided by you), will be used to evaluate and predict the level of risk associated with providing you with a contract of insurance. The criteria used in this assessment will enable us to determine whether we can offer you cover or whether you may be required to pay an additional premium for cover.

If we make a decision about you, through information processed by automated means, and the decision made by us produces a legal effect concerning you (such as the rejection of offering you insurance cover), or significantly affects you, you have the right to contest that decision, express your point of view and ask for a human review.

We may use and process your personal information, as set out below, where it is **necessary for us to carry out activities for which it is in our legitimate interests as a business** to do so:

- To improve customer experience:
  - To notify you about changes to our service.
- To protect our business against financial loss:
  - For debt collection or credit vetting;
  - For payment card and booking verification;
  - To obtain reinsurance for the business we underwrite;
  - Sharing with other insurers in respect of recoveries or shared liabilities;
  - For preventing and detecting fraudulent or criminal activity.
- To promote our business, improve our products and services:
  - To send marketing correspondence about products and services similar to those you have previously bought from us. You can opt out and object to our sending you electronic marketing information and this option will be included in every marketing message we send you. See the section ***'When and how do we use your information for marketing'*** for more information;
  - For statistical analysis and actuarial reporting;
  - For internal research/analysis to improve the quality of our Services, the products we offer and new products we are developing by:
    - Inviting customers to take part in surveys or customer/business discussion groups;
    - Using aggregated customer data to make informed decisions based on analysis of customer booking or other purchase trends and behaviours;
    - Management information purposes including risk assessment, performance reporting and management reporting.

- To support any potential company sale or acquisition:
  - In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.

We may use and process your personal information as set out below where we consider that it is in your **vital interests** that we do:

- To assist you or arrange for assistance to be provided to you by third parties either in the event of an incident or emergency.

We may use and process your personal information as set out below where we have your **consent** to do so:

- To assist you or arrange for assistance to be provided to you by third parties where you have special requirements in relation to medical, health or diet;
- To send marketing correspondence about our products and services where we have asked for your permission to do so. See the section ***'When and how do we use your information for marketing'*** for more information.

We and third parties acting on our instructions, such as external law firms and their employees, may use and process your personal information as set out below where there is a **legal requirement** for us to do so:

- For resolving complaints, dealing with disputes and legal proceedings. This might include contacting you proactively if we need to resolve any issues you may be experiencing or have experienced with a booking or other purchase.
- To comply with relevant legal and regulatory obligations e.g. keeping proper books and records.

## **5. When and how do we use your information for marketing:**

**To find out more about our marketing communications, including when and how we may contact you, and how you can opt out of marketing, please read more here.....**

We will only send you information and offers by e-mail or text message if you sign up (opt-in) to receive such marketing, either directly through us or by telling a third party that you would like to receive marketing from us.

## **6. Your rights in relation to any personal data we hold about you:**

**You have a number of rights in relation to your personal information under data protection law. To find out more, please read here...**

### **Your Right to Access Your Personal Information**

You have the right to make a Data Subject Access Request in many circumstances. That is a request for access to the personal information that we hold about you. If we agree that we have to provide personal information to you (or someone else on your behalf), we will provide it to you, or them, free of charge.

We may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information. This may include information about your previous purchases. If someone is acting on your behalf, they will need to provide written and signed confirmation from you that you have given your authority to that person/company to make the request. We will ask for this to be provided before we give you (or another person acting on your behalf) a copy of any of your personal information we may be holding. We may not provide you with a copy of your personal information if it includes the personal information of other individuals or we have another lawful reason to withhold that information.

Please see the section titled **'How to Contact Us'** if you need to make a Data Subject Access Request.

### **Correcting and updating your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change your name or address/e-mail address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us using the details below.

### **Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, as set out in the section above titled **'How do we use your information when providing our services to you'**, you may withdraw your consent at any time.

If you would like to withdraw your consent to us processing any information concerning medical conditions, disabilities and special requirements, please contact us using the contact details below. Please note if you ask us to stop processing this information, it may mean we won't be able to provide all or parts of the services you have requested.

If you withdraw your consent, our use of your personal information before you withdraw is still lawful. Please note that exceptions may apply where we may need to continue to process your data e.g. in order to fulfil other legal obligations or for legitimate business interests.

### **Objecting to our use of your personal information**

Where we rely on our legitimate business interests as the legal basis for processing your personal information for any purpose(s), you may object to us using your personal information for these purposes by e-mailing or writing to us at the address provided at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection law, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

### **Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by e-mailing or writing to us at the address at the end of this policy. Provided we do not have any continuing lawful reason to continue processing or holding your personal information, we will make reasonable efforts to comply with your request. Please note that exceptions may apply where we may need to continue to process your data e.g. in order to fulfil other legal obligations or legitimate business interests.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending, or you require us to keep it in connection with legal proceedings. We may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company, or in connection with legal proceedings.

### **Transferring your personal information in a structured data file**

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out in section titled '***How do we use your information when providing our services to you***', you may ask us to provide you with a copy of that information in a structured data file.

You can ask us to send your personal information directly to another service provider and we will do so if this is technically possible. We may not provide you with a copy of your personal information if it contains the personal information of other individuals or we have another lawful reason to withhold that information.



**How to contact us:**

Any subject access request can be made in writing to:

Data Protection Officer, White Horse Insurance Ireland dac, First Floor, Rineanna House, Shannon Free Zone, Shannon, County Clare, V14 CA36, Ireland.

Alternatively, you can make a subject access request by e-mail to: [customerservice@white-horse.ie](mailto:customerservice@white-horse.ie)

You can also make a request when speaking to any of our customer service team or claims handling team.

When you have made your request and provided us with the information, we need to begin a search for the data we hold on you (including proof of identity). We will have 30 days to respond.

**Making a complaint**

We encourage you to contact us if you have a complaint and we will seek to resolve any issues or concerns you may have.

You have the right to lodge a complaint with the data protection regulator where you believe your legal rights have been infringed, or where you have reason to believe your personal information is being or has been used in a way that doesn't comply with the law. The contact details for the Office of the Data Protection Commissioner (**DPC**), the data protection regulator in Ireland, are available on the [DPC's website](#).

If you wish to contact us about this Privacy Policy, you can e-mail or write to the Data Protection Officer using the contact details above.

**7. Keeping hold of your personal data:**

**If you want to find out more about our data retention policy, please read more here...**

Where you've made a purchase or claim with us, your personal information will be retained to ensure we provide the best possible customer service to you and to comply with our regulatory retention requirements. For example, if you purchase a product from us, we will keep your data for up to 7 years. We will keep your data for marketing purposes for up to 2 years. In some cases, such as where there is a dispute or a legal action, we may be required to keep personal information for longer. We also retain your personal data for legal and audit purposes only for as long as necessary and in accordance with any retention period required by law.

## **8. What is our approach to data security:**

**We take data security very seriously, to find out our approach to this please read more here...**

The transmission of information via the internet is not completely secure, and although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Sites, therefore any transmission is at your own risk. Once we have received your information, we will take all reasonable steps to keep your personal data secure and to try to prevent any unauthorised access, use or loss of your data, by putting in place appropriate security measures and limiting access to those who have a business need to know. All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Sites, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

We have a process to deal with any suspected personal data breach and will notify you and the relevant Data Protection authority of a breach where legally required to do so.

## **Changes to this Privacy Policy**

Please check this page regularly for changes to our privacy policy, which we may change from time to time. You can request a copy of a previous version of our Privacy Policy by following the '**How to contact us**' section as detailed above.

*January 2020 Version 3.0*