



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”).

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.

We may amend this Privacy Policy from time to time to keep it up to date with current legal requirements and the way we operate our business. Please regularly check these pages for the latest version.


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.

This Privacy Policy applies to the insurance and associated services provided by White Horse Insurance Ireland dac, including its UK Branch, trading as White Horse Insurance UK, as a data controller (“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 are committed to collecting and using personal information in accordance with applicable data protection laws including GDPR and Irish Data Protection legislation. Wherever we collect or use personal information, we will make sure we do this for a valid legal reason. This will be for at least one of the following purposes:

- to arrange, manage and administer your insurance policy or handle claims;
 - conducting due diligence including performing Anti Money Laundering and sanction screening checks in adherence with any applicable laws;
 - to meet responsibilities we have to our regulators, tax authorities, law enforcement or otherwise meet our legal responsibilities;
 - to operate and improve our portfolio of products and services and keep people informed about what we can offer;
 - for any other purposes where we have asked for and obtained consent to use personal information.
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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 can come from the following sources:

- you;
- information already held about you by us, including details from previous policies of insurance and claims;
- from the distribution partner;
- from fraud prevention agencies or from other companies such as other insurance undertakings where we are investigating suspected fraud;
- from publicly available information including social media websites and online content, newspaper articles, television, radio and other media content, court judgements, public registers and specialist databases and (only for purposes of verifying your identity) electoral registers; and
- your scheme trustee or other relevant insurance companies, witnesses, reinsurers, third party service providers and legal representatives.

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, but is not limited to, your name, address, e-mail address, telephone number, date of birth, bank account details or debit/credit card details, security questions and certain other information (such as destination of travel). We need to collect this information in order to provide the products and other services you are requesting. Where you have purchased your insurance from a third-party distributor, we will receive these details directly from the third party. Personal information is 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.

Sensitive data

For some of our 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 recognise the sensitivity of collecting this information, so will only ask for it where we need it to arrange, manage or administer an insurance contract, handle claims or prevent fraud. 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.

Information about other individuals

Whilst most of the information we collect relates to the policyholder, we may ask for information about other individuals if it is necessary to arrange, manage or administer an insurance contract or handle claims. These include:

- a policyholder asking us to provide insurance to other household or family members, or members of a group;
- we may ask an insured to provide health information about other family members where this is relevant to the risk we are covering when we arrange a policy;
- we may collect information about several individuals when we handle a claim, such as injured third parties and witnesses; and
- where a minor is a claimant or beneficiary.

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.

Fraud and Financial Crime


We will use your personal information to detect and prevent fraudulent practices and fight financial crime to meet our regulatory responsibilities. This may involve checking public registers e.g. the electoral roll or registers of court judgments, bankruptcy orders or repossessions, conducting online searches from websites, social media and other information sharing platforms for more details, our own and other White Horse company records and other reputable organisations.


We may also share your information and undertake searches with third party organisations such as public bodies, fraud prevention agencies and our regulators (which include the Central Bank of Ireland, Financial Conduct Authority, Financial Services and Pensions Ombudsman, Data Protection Commission). If you give us false or inaccurate information and we suspect fraud, we will record this to prevent further fraud and money laundering.

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

Our Policy is to only keep personal information for as long as is reasonably required for the purpose(s) for which it was collected. We do keep certain transactional records - which may include personal information - for more extended periods if we need to do this to meet legal, regulatory, tax or accounting needs. For instance, under the Consumer Protection Code, we are required to retain an accurate record of dealings with us for at least six years after your last interaction with us, so we can respond to any complaints or challenge you or others might raise later.

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






maintain a data retention schedule which we apply to the records we hold. Where your personal information is no longer required, we will ensure it is securely deleted, permanently obscured or put beyond use by our employees.

When you give your personal data to us, some personal data will also need to be provided, processed and stored by relevant third parties. These third parties include, but are not limited to,:

- 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 and 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 legislation 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 would 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 EU-US Data Privacy Framework); or
 - (b) the transfer is necessary to enable your contract to be performed; or
 - (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).
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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.

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;
- to provide 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.

When you purchase a policy

If you request a quote or take out a policy with us, we will collect information such as name, address, e-mail address, telephone number, date of birth, bank account details or debit/credit card details, security questions and certain other information. For our Travel and Wedding products, further information such as destination of travel and venue details will be required.


Additionally, our Travel and Wedding products may require us to obtain sensitive personal data such as 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. All sensitive special category data will be handled with the utmost caution and in line with regulatory requirements.


If you make a claim

If you make a claim under any of our insurance policies, we will need to collect information to help validate and administer the claim. If you are making a claim following a travel accident, we will ask for details of the claim including, for accidents, information about those involved and any personal injury you or others may have suffered. We may also validate your claim by checking details with the wedding venue or tour operator.

5. Automated decision making

We may use automated decision-making tools 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 or provided by a person acting on your behalf, with your permission), 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;
 - 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 an 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; or
- To send marketing correspondence about our products and services where we have asked for your permission to do so.

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; or
 - To comply with relevant legal and regulatory obligations e.g. keeping proper books and records.
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6. What is our approach to data security?

We take data security very seriously. 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.

7. Legal basis for our use of information

We will only collect information where we have a lawful basis for doing so. Article 6 of the GDPR defines six lawful basis for the collection of data. At least one valid legal basis is required in all cases where we will seek to lawfully process personal information in line with data protection law.

The table below sets out the various examples of the types of information we collect and process and the legal basis for doing so:

Purpose of Processing	Lawful Basis for Processing
To provide you with a quote for an insurance, or insurance cover, if you decide to purchase one of our products.	Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract.
To verify your identity at the time of purchase or in the event of a claim.	Processing is necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract; To comply with legal obligations (for example money laundering requirements).
To administer your insurance contract, make any changes during its term including claims and cancellations or answer queries you have may including updates.	Processing is necessary for the performance of a contract.
Health data is used for the purposes of providing quotes and underwriting, managing reinsurance arrangements, processing any claims you may have, fraud investigation and handling any complaints you may have.	Irish Data Protection law allows us to use health data in connection with your insurance policy. We may also need to use your health data for the purposes of establishing, exercising or defending legal rights, including in connection with advice, claims or proceedings, and where authorised by law.
Communications with you in relation to payments connected	Processing is necessary for the performance of a contract.

to your insurance contract.	
To detect and prevent fraud, as well as comply with laws and regulations such as money laundering requirements.	Processing is necessary for the performance of a contract.
We may use personal information to send direct marketing communications about our products and services or where you have entered into a competition	Consent.
To comply with laws and regulations such as money laundering checks.	Processing is necessary to comply with legal obligations.
To obtain reinsurance for the business we underwrite.	Processing is necessary for our legitimate interests.
For management information purposes, including portfolio assessment, risk assessment, performance reporting and management reporting.	For our legitimate interests in managing our business.
Market research and data analytics, including staff training and customer insights.	For our legitimate interests in managing our business.
Compliance by us with all relevant legal and regulatory obligations to include those (e.g. annual benefit statements, annual reports) if we act as Registered Administrator of a Pension Plan.	Processing is necessary to comply with legal obligations.
Identifying customers requiring additional support.	For all claimants, the legal basis for our processing of this data is to comply with our legal and regulatory obligations.

8. 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.

We may ask you for proof of identity when making a request to exercise any of these rights. 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 do this to ensure we only disclose information or change account details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may, however, take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.



You may exercise any of the below listed rights by writing to us at our registered office at: Data Protection Officer Rineanna House, Free Zone West, Shannon, Co Clare, V14 CA36, Ireland. or by emailing us at andy.cheetham@white-horse.ie. Should you be dissatisfied with the manner in which we have processed your Personal Information or of the opinion it was not processed in accordance with current data protection laws, you can lodge a complaint with the office of the Data Protection Commissioner at any time.

Your Right to Access Your Personal Information

You can ask us to confirm whether or not we have and are using your personal information. You can ask to get a copy of your personal information by completing a Data Subject Access Request at any time.

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. You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information, but would need to verify the accuracy of the information first.

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 us 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

You can ask that we erase your personal information if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information) or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal information. We may not always be able to comply with your request, for example where we need to keep using your personal information in order to comply with our legal obligation or where we need to use your personal information to establish, exercise or defend legal claims.

You may also ask us to restrict processing your personal information in certain circumstances, for example:

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal information is not lawful, but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected, but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal information, but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal information following a request for restriction where we have your consent to use it, or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

Transferring your personal information to another organisation


You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal information in order to perform a contract with you or where we asked for your consent to use your personal information. This right does not apply to any personal information which we hold or process outside automated means.

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.

To contest automated decision making

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by us produces a legal effect concerning you (such as the rejection of your claim), or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where we are authorised by law to make such decisions and have adopted suitable safeguards in our decision-making processes to protect your rights and freedoms.



9. How to contact us

The primary point of contact for all issues arising from this privacy policy, including requests to exercise data subject rights, is our Data Protection Officer. The Data Protection Officer can be contacted in the following ways:

Email Address	dataprotectionofficer@white-horse.ie
Postal Address	White Horse Insurance Ireland Dac, Rineanna House, Free Zone West, Shannon, Co Clare, V14 CA36, Ireland

Any subject access request can be made in writing to:

Data Protection Officer, White Horse Insurance Ireland dac, 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.

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

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.

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.