

## Privacy Policy

Ecclesiastical is committed to the privacy and confidentiality of information that you provide to us. This privacy notice describes our current policies and practices with regard to personal information collected and used by us. Please take your time to read this notice carefully. When using an Ecclesiastical website, this notice should be read alongside the [website terms and conditions](#).

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### 1. About us

Ecclesiastical Insurance Office plc (EIO) Reg. No. 24869 is registered in England at Beaufort House, Brunswick Road, Gloucester, GL1 1JZ, UK. In Ireland, we have a registered branch office located in Dublin, Reg. No. 902180. Our office address is 2<sup>nd</sup> Floor, Block F2, EastPoint, Dublin 3, D03 T6P8.

Our contact details are as follows;

Tel: (01) 619 0300

Fax: (01) 662 4639

Email: [ireland@ecclesiastical.com](mailto:ireland@ecclesiastical.com)

Website: [www.ecclesiastical.ie](http://www.ecclesiastical.ie)

Ecclesiastical Insurance Office plc is part of the Benefact Group plc.

We are authorised to underwrite general insurance products (property and casualty) and we specialise in the following niches;

- Faith
- Education
- Heritage
- Fine Art
- Charity
- Property Owners

Ecclesiastical is a non-life Insurance provider and our service is underpinned by underwriting, claims settlement, risk management and marketing. These are carried out to ensure we offer all customers the best protection available and requires us to gather, keep and use relevant data pertaining to the risks we insure.

Providing insurance services means that we need to collect and process data so that we can provide you with a quote, insurance and where relevant, handle any claims or complaints that might arise. This makes us a "Data Controller".

If you are unsure about who the data controller of your personal information is, you can also contact us at any time by phoning the Compliance Associate on 01 6190300, emailing us at [compliance@ecclesiastical.com](mailto:compliance@ecclesiastical.com) or by writing to The Data Protection Officer, Ecclesiastical Insurance Office plc, 2<sup>nd</sup> Floor, Block F2, EastPoint, Dublin 3, D03 T6P8.

## **2. Our Processing of your personal information**

Depending on our relationship with you and the nature of services we are providing you with we will collect different types of personal information about you and use it for different purposes.

From time to time we may ask you to provide or we may receive your "sensitive personal information" otherwise known in data protection laws as "special categories of personal information" (which is information relating for example to your health, criminal convictions, religious or philosophical beliefs.) For example where you are a named individual under a church insurance policy such as a Bishop, the religious denomination of the church may automatically reveal your religious beliefs. In these circumstances, we would use your sensitive personal information to provide a quote and the insurance policy and to process any claims you make. We may also need details of any unspent criminal convictions you have for fraud prevention purposes and you will have to tell us if you are or have ever been a Bankrupt. If you are a third party against whom we are seeking a recovery as part of our right to subrogation, we may have details of your criminal convictions where it relates to a claim under an Ecclesiastical insurance policy.

Where you provide personal information to us about other individuals [for example members of your church or household] we will also be the data controller of and responsible for their personal information. You should refer them to this notice.

We have structured this notice so that you only have to consult on the section below that is relevant to you and reflects your relationship with us.

### **2.1 Prospective policyholder or beneficiary under an insurance policy**

If you apply for an insurance policy with us (for example home insurance policy), or someone applies for a policy which will cover you or list you as a named beneficiary (for example a clergy member under a church legal expenses insurance policy) this section will be applicable to you and will provide key information about how we use your personal information.

#### **2.1.1 We collect the following information**

- Your name and title, address, telephone numbers, email addresses and date of birth.
- Where you are not the person applying for insurance, your relationship with or connection to the prospective policyholder.
- Identity documents such as passport, driving licence and PPS number.
- Employment status and related information such as job title, employment history and education.
- Information which is related to your insurance application including:
  - details about previous insurance policies you have held and any previous claims you have made;

- details about your family such as dependants or spouse;
- policy specific information. For example if you are applying for home insurance we will need information about your property and possessions or where you are applying for an art and private client policy, we will need information about your art collection.
- Financial information including:
  - your bank account and payment details;
  - details about your income, and
  - information obtained from checking sanctions lists and credit checks such as bankruptcy orders, individual voluntary arrangements, office disqualifications or court judgments.
- Information which is available publically such as on internet search engines.

### **2.1.2 We collect the following Sensitive Personal Information**

- Information about your physical and mental health if relevant to your insurance application (for example where you apply for a travel policy you may need to disclose pre-existing medical conditions).
- Information about any criminal offences you have been convicted for and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.
- We may also collect information because it is relevant to your application, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions or membership of a trade union. For example, where you disclose that you are a clergy member at an Anglican Church, this will automatically reveal your religious beliefs.

### **2.1.3 We collect your personal information**

Directly from you:

- when you apply for a policy;
- when we provide you with a quotation; and
- during any communications we have, such as by telephone or email or when you make a general enquiry.

We will also collect your personal information from:

- The prospective policyholder where you are a beneficiary.
- Third parties who we rely on to administer insurance such as brokers, insurers and our own business partners.
- Third parties who provide sanctions checking services.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
- Other companies in the Benefact Group.

Public sources such as court judgments, insolvency registers, internet search engines, and directories of Anglican ministers.

### 2.1.4 What we use your personal information for?

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We need to use your personal information to enter into or perform the insurance contract that you have applied for.** We will rely on this legal ground for all activities that are connected to your application and without using your personal information we would be unable to do so, such as assessing your application against our own risk appetite and providing you with a quote or declining to do so.
- **We have a legal or regulatory obligation to use your personal information.** We have a legal obligation to carry out anti-money laundering checks. Our regulators require us to maintain records of all dealings with you and to comply with our regulatory reporting requirements we may need to send your personal information to our regulators.
- **We have a business need to use your personal information.** Such needs will include keeping business and accounting records, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

When we use your "sensitive personal information" (such as information about your health, religion or criminal offences), we need to have an additional "legal ground". When using your "sensitive personal information", we will rely on the "legal grounds" set out below:

We have an insurance purpose to use your sensitive personal information such as assessing your insurance application, arranging or administering a policy and preventing and detecting fraud.

- **You have clearly made your sensitive personal information public.** For example where you are a Bishop of an Anglican Church and you have made your religious beliefs common knowledge.
- **We need to use your sensitive personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves.
- **You have given your consent.**

### 2.1.5 What are the legal grounds on which we use your personal information?

What is the purpose for using your personal information ►	Legal grounds for using your personal information ►	Legal grounds for using your sensitive personal information ►
To assess your insurance application	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract</li> <li>• We have a business need (to assess all</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering an insurance policy.</li> <li>• You have made this information public knowledge.</li> </ul>

	insurance applications against our own risk appetite.)	
To carry out medical screening for travel insurance policies	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract</li> <li>• We have a business need (to carry out medical screening to ensure that we provide appropriate insurance cover)</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering an insurance policy.</li> </ul>
To carry out fraud, credit and anti-money laundering checks on you	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract.</li> <li>• We have a legal obligation.</li> <li>• We have a business need (to prevent fraud and other financial crime).</li> </ul>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud).</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> <li>• We have a legal obligation.</li> </ul>	<ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
To generally communicate with you and handle any queries about your application.	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract.</li> <li>• We have a business need (to respond to all communications).</li> </ul>	<ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal rights.</li> <li>• You have made this information public knowledge.</li> </ul>
For business purposes such as systems development, migration of systems and live testing, diagnosing any problems with our servers and website.	<ul style="list-style-type: none"> <li>• We have a business need (to run an efficient business)</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering an insurance policy.</li> </ul>

For business purposes such as maintaining management information, internal audits, and carrying out statistical and strategic analysis.	<ul style="list-style-type: none"> <li>We have a business need (to run an efficient business and improve our business)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the purpose of administering an insurance policy.</li> </ul>
To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).	<ul style="list-style-type: none"> <li>We have a business need (to develop and improve the services we offer).</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the purpose of administering an insurance policy.</li> </ul>

### **2.1.6 Who we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- The policyholder where you are a beneficiary.
- Third parties who we rely on to provide insurance and administer your application such as brokers, insurers and our own business partners.
- Medical screening service providers in relation to travel insurance.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
- Other companies in the Benefact Group.
- Service providers we have contracted with including our subcontractors and loss adjusters, surveyors, engineers, medical professionals, investigators, agent's, auditors, our solicitors, actuaries, IT providers and database providers and marketing mailing providers.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.

- The Financial Conduct Authority and the Prudential Regulation Authority who are our regulators and key regulatory authorities such as the Central Bank of Ireland.
- Law enforcement agencies such as An Garda Síochána, the Criminal Assets Bureau and the Revenue Commissioners.
- Data Protection Commissioner (DPC)
- Our own insurers and companies who we have appointed to assist with arranging our insurance.

## **2.2 Policyholder or beneficiary under an insurance policy**

If you have an insurance policy with us (for example home insurance policy), if the policy covers you or if you are a named individual under an insurance policy with us (for example a clergy member under a church legal expenses insurance policy) this section will be applicable to you and will provide key information about how we use your personal information.

### **2.2.1 *What personal information we collect?***

- Your name and title, address, telephone numbers, email addresses and date of birth.
- Where you are not the policyholder, your relationship with or connection to the policyholder.
- Identity documents such as passport, driving licence and PPS number.
- Employment status and related information such as job title, employment history and education.
- Information which is related to your insurance policy including:
  - details about previous insurance policies you have held and any previous claims you have made;
  - details about your family such as dependants or spouses; and
  - policy specific information. For example if you have home insurance we will need information about your property and possessions or where you hold an art and private client policy, we will need information about your art collection.
- Financial information including:
  - your bank account and payment details;
  - details about your income; and
  - information obtained from checking sanctions lists and credit checks such as bankruptcy orders, Personal Insolvency Arrangement, Individual Voluntary Arrangements, Office Holder Restrictions and Disqualifications or court judgments.
- Information which is relevant to any claims you make under your policy. This could include photographic evidence you provide us with, for example if you make a claim under your travel policy, we will need information about the country you visited.
- Information which is available publically such as on internet search engines and social media where we need to investigate fraudulent claims.
- Security questions and answers to access the Ecclesiastical portal where policy documents can be viewed.

### **2.2.2 What sensitive personal information we collect?**

- Information about your physical and mental health if relevant to your insurance policy or any claims you make (for example on sickness or accident policies or where you take out a travel policy and make a claim for medical assistance we will need information about the medical conditions suffered. This information may be provided to us in the form of GP reports or medical data such as blood tests).
- Information about any criminal offences you have been convicted for and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.
- We may also collect information because it is relevant to your policy or claim, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions or trade union membership. For example, where we process information about you because you are a clergy member at an Anglican Church, this will automatically reveal your religious beliefs.

### **2.2.3 How we collect your personal information?**

When you are the policyholder, directly from you:

- when we provide you with a quote;
- when you apply for or renew a policy;
- when you make a claim on your policy; and
- during any communications we have, such as by telephone or email or when you make a complaint or general enquiry.

We also collect your personal information from:

- The policyholder where you are a beneficiary.
- A third party who has power of attorney over you or any other persons appointed by you to act on your behalf.
- Third parties who we rely on to administer insurance and handle claims such as brokers, insurers, third party claimants, defendants, witnesses and our own business partners.
- Third parties we appoint to assist with an insurance policy or claim such as claims handlers, medical experts and medical screening service providers, investigators and loss adjusters.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
- Other companies in the Benefact Group.
- Public sources such as court judgments, insolvency registers, internet search engines, directories of Anglican ministers and social media where we need to investigate fraudulent claims.

### **2.2.4 What we use your personal information for?**

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your

"personal information", we will rely on the "legal grounds" set out below:

- **We need to use your personal information to enter into or perform the insurance contract that you have taken out with us.** We will rely on this legal ground for all activities that are connected to your insurance contract and without using your personal information we would be unable to do, such as providing you with a quote, providing insurance cover, handling claims and responding to complaints.

- **We have a legal or regulatory obligation to use your personal information.**

We have a legal obligation to carry out anti-money laundering checks. Our regulators require us to maintain records of all dealings with you and to comply with our regulatory reporting requirements we may need to send your personal information to our regulators.

**We have a business need to use your personal information.** Such needs will include keeping business and accounting records, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

When we use your "sensitive personal information" (such as information about your health, religion or criminal offences), we need to have an additional "legal ground". When using your "sensitive personal information", we will rely on the "legal grounds" set out below:

- **We have an insurance purpose to use your sensitive personal information** such as assessing your insurance application in particular against our own risk appetite, arranging or administering a policy, handling claims and preventing and detecting fraud.
- **You have clearly made your sensitive personal information public.** For example where you are a Bishop of an Anglican Church and you have made your religious beliefs common knowledge.
- **We need to use your sensitive personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves or when we are investigating or handling a legal claim that a third party brings against you.
- **You have given your consent.**

#### ***2.2.5 What are the legal grounds on which we use your personal information?***

<b>What is the purpose for using your personal information ►</b>	<b>Legal grounds for using your personal information ►</b>	<b>Legal grounds for using your sensitive personal information ►</b>
To provide an insurance policy with appropriate cover	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract</li> <li>• We have a business need (to provide insurance cover which is in line with our own risk appetite)</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering an insurance policy.</li> <li>• You have made this information public knowledge.</li> </ul>
To carry out medical screening for travel insurance policies	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract</li> <li>• We have a business need (to carry out medical screening to ensure that we provide appropriate insurance cover)</li> </ul>	It is necessary for the purpose of administering an insurance policy.
To handle any claims you make under your insurance policy	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract</li> <li>• We have a business need (to investigate claims, respond and conclude all claims).</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering a claim under an insurance policy.</li> <li>• We need to establish, exercise or defend legal rights.</li> <li>• You have made this information public knowledge.</li> </ul>
To carry out fraud, credit and anti-money laundering checks on you when you enter into a policy and to prevent any fraudulent claims	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract.</li> <li>• We have a legal obligation.</li> <li>• We have a business need (to prevent fraud and other financial crime).</li> </ul>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud).</li> <li>• It is necessary for the purpose of administering an insurance policy.</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
To comply with our legal or regulatory obligations.	We have a legal obligation.	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering an insurance policy.</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
To handle any complaints you may have and generally communicate with you.	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your insurance contract.</li> <li>• We have a business</li> </ul>	<ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal rights.</li> <li>• You have made this</li> </ul>

	need (to respond to all communications and complaints and investigate and resolve complaints).	information public knowledge.
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> <li>We have a business need (to have our own insurance cover in place)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the purpose of administering an insurance policy.</li> <li>We need to establish, exercise or defend legal rights.</li> </ul>
For business purposes such as systems development migration of systems and live testing, diagnosing any problems with our servers and website	We have a business need (to run an efficient business)	It is necessary for the purpose of administering an insurance policy.
For business purposes such as maintaining management information and carrying out statistical and strategic analysis	We have a business need (to run an efficient business and improve our business)	It is necessary for the purpose of administering an insurance policy.
For financial purposes such as maintaining management information and accounting records and carrying out audits	We have a business need (to maintain appropriate financial records)	It is necessary for the purpose of administering an insurance policy.
To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).	We have a business need (to develop and improve the services we offer).	It is necessary for the purpose of administering an insurance policy.
To contact you to inform you about services we think you might be interested in.	We have a business need (to inform you about other services we offer).	You have provided your consent.

### **2.2.6 Who we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- The policyholder where you are a beneficiary.
- A third party who has power of attorney over you or any other persons appointed by you to act on your behalf.
- Third parties who we rely on to provide insurance and handle claims such as brokers, insurers, third party claimants, defendants, witnesses and our own business partners.
- Third parties we appoint to assist with an insurance policy or claim such as claims handlers, medical experts and medical screening service providers, surveyors, investigators and loss adjusters.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks including Insurance Link.
- Other companies in the Benefact Group.
- Our solicitors
- Service providers we have contracted with including our subcontractors, loss adjusters and medical professionals, surveyors, investigators, engineers, agents, auditors, solicitors, actuaries, IT providers and database providers and marketing mailing providers.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
- The Financial Conduct Authority the Prudential Regulation Authority and the Central Bank of Ireland who are our regulators.
- Law enforcement agencies such as An Garda Síochána, Criminal Assets Bureau and the Revenue Commissioners.
- Data Protection Commissioner (DPC)
- Our own insurers and companies who we have appointed to assist with arranging our insurance.

### **2.3 Third party Claimant**

If you make a claim against a third party who has an insurance policy with us, this section will be applicable to you and will provide key information about how we use your personal information.

#### **2.3.1 What personal information we collect?**

- Your name and title, address, telephone numbers and email addresses, date of birth and gender, employment status, related information such as job title, employment history and education.
- Identity documents such as passport, driving licence and PPS number.
- Information which is available publically such as via internet search engines and social media where we need to investigate potentially fraudulent claims.
- Any information which is related to your claim which could include:

- your job title and employment status, employment history, salary and education if relevant;
- details about the incident; and
- photographic evidence.

### **2.3.2 What sensitive personal information we collect?**

- Information about your physical and mental health if relevant to the claim you are making and in particular any information contained in a medical report.
- Information about any criminal offences you have been convicted for and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.
- We may also collect information because it is relevant to your claim, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions or trade union membership; for example where we seek to validate or investigate a claim we may receive any of the above information. We may also need to collect this information to assess the value of your claim.

### **2.3.3 How we collect your personal information?**

Directly from you when you contact us to make a claim.

We also collect your personal information from:

- Our policyholder or their representatives.
- Third parties who we rely on to provide insurance and handle claims such as brokers, insurers, third party claimants, defendants, witnesses and our own business partners.

Third parties we appoint to assist with a claim such as claims handlers, medical experts we have commissioned to produce a medical report and medical screening service providers, investigators and loss adjusters.

- Third parties involved in the claim process such as lawyers or the Director of Public Prosecutions.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
- Other companies in the Benefact Group.
- Public sources such as court judgments, insolvency registers, internet search engines, social media.

### **2.3.4 What we use your personal information for?**

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

**We have a legal or regulatory obligation to use your personal information.** We have a legal obligation to carry out anti-money laundering checks. Our regulators require us to maintain records

of all dealings with you and to comply with our regulatory reporting requirements we may need to send your personal information to our regulators. We are also required to provide information to the Recovery of Benefits & Assistance Scheme (RBA) for the purposes of fulfilling our statutory obligation to notify the RBA prior to claim settlement.

- **We have a business need to use your personal information.** Such needs will include investigating claims, exercising our right of subrogation, keeping business and accounting records, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

When we use your "sensitive personal information" (such as information about your health, religion or criminal offences), we need to have an additional "legal ground". When using your "sensitive personal information", we will rely on the "legal grounds" set out below

- **We have an insurance purpose to use your sensitive personal information and there is a substantial public interest** such as handling claims and preventing and detecting fraud.
- **We need to use your sensitive personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves or when we are investigating the claim that you have brought against an individual who holds a policy with us or when we are exercising our right of subrogation.
- **You have given your consent**

### 2.3.5 What are the legal grounds on which we use your personal information?

What is the purpose for using your personal information ►	Legal grounds for using your personal information ►	Legal grounds for using your sensitive personal information ►
To handle your claim	<ul style="list-style-type: none"> <li>• We have a business need (to assess and investigate your claim and deal with it appropriately).</li> <li>• We have a legal obligation.</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of handling claims.</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
To carry out fraud checks to prevent any fraudulent	We have a business need (to prevent fraud).	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect</li> </ul>

claims		<p>unlawful acts (where we suspect fraud).</p> <ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
To comply with our legal or regulatory obligations.	We have a legal obligation.	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of handling claims.</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
To handle any complaints you may have and generally communicate with you and your medical/legal representatives.	We have a business need (to respond to all communications and complaints and investigate and resolve complaints).	We need to establish, exercise or defend legal rights.
To exercise our right of subrogation (that is to bring an action for recovery of the claim amount we have paid against the third party who we believe caused the loss or injury)	<ul style="list-style-type: none"> <li>• We have a business need (to exercise our right of subrogation and recover payment from the third party who caused the loss or injury)</li> </ul> <p>We have a legal obligation.</p>	We need to establish, exercise or defend legal rights.
To apply for and claim on our own insurance.	We have a business need (to have our own insurance cover in place)	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of handling claims.</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
For business purposes such as maintaining management information and carrying out statistical and strategic analysis	We have a business need (to run an efficient business and improve our business)	It is necessary for the purpose of administering an insurance policy.
For business purposes such as systems development, migration of systems and live testing, diagnosing any problems with our servers and website	We have a business need (to run an efficient business)	It is necessary for the purpose of administering an insurance policy.

For financial purposes such as maintaining management information and accounting records and carrying out audits	We have a business need (to maintain appropriate financial records)	It is necessary for the purpose of administering an insurance policy.
To provide improved quality, training and security (for example, through recorded or monitored phone calls to our contact numbers, or carrying out customer satisfaction surveys).	We have a business need (to develop and improve the services we offer).	It is necessary for the purpose of administering an insurance policy.

### **2.3.6 Who we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- The policyholder.
- Other insurers that are involved in your claim.
- Third parties who we rely on to provide insurance and handle claims such as brokers, insurers, third party claimants, defendants, witnesses and our own business partners.
- Third parties we appoint to assist with a claim such as claims handlers, medical experts and medical screening service providers, surveyors, investigators and loss adjusters.
- The third party against whom we are seeking recovery as part of the subrogation process and his or her legal representative.
- The Recovery of Benefits & Assistance Scheme
- Your legal and medical advisors.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks including Insurance Link.
- Other companies in the Benefact Group.
- Our solicitors
- Service providers we have contracted with including our subcontractors and agents, auditors,

solicitors, actuaries, IT providers and database providers and marketing mailing providers.

- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
- The Financial Conduct Authority and the Prudential Regulation Authority and the Central Bank of Ireland who are our regulators.
- Law enforcement agencies such as An Garda Síochána, Criminal Assets Bureau and the Revenue Commissioners
- Data Protection Commissioner (DPC)
- Our own insurers and companies who we have appointed to assist with arranging our insurance.

## **2.4 Third party pursued for a recovery**

If you are a third party from whom we are seeking recovery when we exercise our right of subrogation, this section will be applicable to you and will provide key information about how we use your personal information. We may exercise this right where we have paid a claim under an insurance policy but we believe that your act or failure to act caused the loss or injury.

### **2.4.1 What personal information will we collect?**

- Your name and title, address, telephone number and email address, date of birth and gender;
- Any information which is related to the relevant claim which could include:
  - your job title and employment status, employment history and salary and education if relevant;
  - details about the incident and your actions; and
  - photographic evidence.
- Information which is available publically such as via internet search engines and social media.

### **2.4.2 What sensitive personal information will we collect?**

- Information about your physical and mental health if relevant to the claim.
- Information about any criminal offences you have been convicted of and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.
- We may also collect information because it is relevant to the claim made under an Ecclesiastical policy, which reveals or is likely to reveal your; race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, or data concerning your sex life or sexual orientation.

### **2.4.3 How will we collect your personal information?**

We will collect your personal information from:

- The policyholder.
- Third parties who we rely on to provide insurance and handle claims such as brokers, insurers, third party claimants, witnesses and our own business partners.
- Third parties we appoint to assist with a claim such as claims handlers, investigators and loss adjusters.

- Third parties involved in the claim process such as lawyers or the Director of Public Prosecutions.
- Other companies in the Benefact Group.
- Public sources such as court judgments, internet search engines and social media

#### **2.4.4 What will we use your personal information for?**

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We have a legal or regulatory obligation to use your personal information.** We have a legal obligation to carry out anti-money laundering checks. Our regulators require us to maintain records of all dealings with you and to comply with our regulatory reporting requirements we may need to send your personal information to our regulators. We are also required to provide information to the Recovery of Benefits & Assistance Scheme (RBA) for the purposes of fulfilling our statutory obligation to notify the RBA prior to claim settlement.
- **We have a business need to use your personal information.** Such needs will include investigating claims, exercising our right of subrogation, keeping business and accounting records, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

When we use your "sensitive personal information" (such as information about your health, religion or criminal offences), we need to have an additional "legal ground". When using your "sensitive personal information", we will rely on the "legal grounds" set out below:

- **We have an insurance purpose to use your sensitive personal information and there is a substantial public interest** such as handling claims.
- **We need to use your sensitive personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves such as when we are exercising our right of subrogation.

#### **2.4.5 What are the legal grounds on which we will use your personal information?**

<b>What is the purpose for using your personal information</b>	<b>Legal grounds for using your personal information</b>	<b>Legal grounds for using your sensitive personal information</b>
To handle a claim	<ul style="list-style-type: none"> <li>• We have a business need (to assess and investigate a claim and deal with it appropriately).</li> <li>• We have a legal obligation.</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the insurance purpose of handling claims.</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> <li>• We have a legal obligation.</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the insurance purpose of handling claims.</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>

To handle any complaints you may have and generally communicate with you	<ul style="list-style-type: none"> <li>We have a business need (to respond to all communications and complaints and investigate and resolve complaints).</li> </ul>	<ul style="list-style-type: none"> <li>We need to establish, exercise or defend legal rights.</li> </ul>
To exercise our right of subrogation (that is to bring an action for recovery of the claim amount we have paid against you as the third party who we believe caused the loss or injury)	<ul style="list-style-type: none"> <li>We have a business need (to exercise our right of subrogation and recover payment)</li> <li>We have a legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>We need to establish, exercise or defend legal rights.</li> </ul>
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> <li>We have a business need (to have our own insurance cover in place)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the insurance purpose of handling claims.</li> <li>We need to establish, exercise or defend legal rights.</li> </ul>
For business purposes such as maintaining management information and carrying out statistical and strategic analysis	<ul style="list-style-type: none"> <li>We have a business need (to run an efficient business and improve our business)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the insurance purpose of administering an insurance policy.</li> </ul>
For business purposes such as systems development, migration of systems and live testing, diagnosing any problems with our servers and website	<ul style="list-style-type: none"> <li>We have a business need (to run an efficient business)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the insurance purpose of administering an insurance policy.</li> </ul>

#### **2.4.6 Who will we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- The policyholder.
- Other insurers that are involved in your claim.
- Third parties who we rely on to provide insurance and handle claims such as brokers, insurers, witnesses and our own business partners.
- Third parties we appoint to assist with a claim such as claims handlers, investigators and loss adjusters.
- Other third parties who we engage with when exercising our right of subrogation which include the third claimant and their legal adviser or legal representative.
- Your legal adviser or legal representative.
- The Recovery of Benefits & Assistance Scheme.
- Other companies in the Benefact Group.
- Our solicitors.
- Service providers we have contracted with including our subcontractors and agents, auditors, our solicitors, actuaries, IT providers and database providers and business suppliers.

- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
- The Financial Conduct Authority and the Prudential Regulation Authority and the Central Bank of Ireland who are our regulators.
- Law enforcement agencies such as An Garda Síochána, Criminal Assets Bureau and the Revenue Commissioners.
- Data Protection Commissioner (DPC)
- The courts.
- Our own insurers and companies who we have appointed to assist with arranging our insurance.

## **2.5 Witness to an incident**

If you have witnessed an incident which has now become the subject of a claim, this section will be applicable to you and will provide key information about how we use your personal information.

### **2.5.1 What personal information we collect?**

- Your name and title, address, telephone numbers and email addresses, date of birth and gender.
- Your employment status and related information such as job title, employment history and education.
- Identity documents such as passport, driving licence and PPS number.
- Information which is available publically such as via internet search engines and social media where we need to investigate potentially fraudulent claims.
- Any information which is related to the incident you witnessed.

### **2.5.2 What sensitive personal information we collect?**

- Information about your physical and mental health if you suffered an injury as a result of the incident you witnessed or where you disclose information to us for example referring to a disability you have.
- Information about any criminal offences you have been convicted for and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.

### **2.5.3 How will we collect your personal Information?**

Directly from you when we contact you or you contact us to discuss the incident you witnessed.

We will also collect your personal information from:

- Those people involved in the incident such as the policyholder, the claimants and other witnesses.
- Other third parties involved in the incident from an insurance administration perspective such as brokers, insurers, claims handlers, loss adjusters, solicitors and business partners.

Third parties we have appointed to assist us in relation to the incident you witnessed such as Information which is available publically such as via internet search engines and social media where we need to

investigate potentially fraudulent claims.

- medical experts, medical screening service providers and investigators.
- Other companies in the Benefact Group.
- Public sources such as court judgments, insolvency registers, internet search engines, social media.

#### **2.5.4 What we use your personal information for?**

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We have a legal or regulatory obligation to use your personal information.** We have legal obligations to carry out anti-money laundering checks and our regulators require us to maintain records of all dealings with you. To comply with our regulatory reporting requirements we may need to send your personal information to our regulators.
- **We have a business need to use your personal information.** Such needs will include investigating claims, exercising our right of subrogation, keeping business and accounting records, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.
- **When we use your "sensitive personal information" (such as information about your health, religion or criminal offences), we need to have an additional "legal ground".** When using your "sensitive personal information", we will rely on the "legal grounds" set out below:
- **We have an insurance purpose** to use your sensitive personal information such as handling claims and preventing and detecting fraud.
- **We need to use your sensitive personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves or when we are investigating the claim that has been brought against an individual who holds a policy with us.
- **You have given your consent.**

#### **2.5.5 What are the legal grounds on which we use your personal information?**

<b>What is the purpose for using your personal information ►</b>	<b>Legal grounds for using your personal information ►</b>	<b>Legal grounds for using your sensitive personal information ►</b>
<p>To investigate the claim made and to understand the incident which is the subject of the claim</p>	<ul style="list-style-type: none"> <li>• We have a business need (to assess and investigate your claim and deal with it appropriately). We have a legal obligation.</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of handling claims.</li> <li>• We need to establish, exercise or defend legal rights.</li> </ul>
<p>To prevent any fraudulent claims</p>	<p>We have a business need (to prevent fraud).</p>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud).</li> <li>• We need to use your information in order to establish, exercise or defend legal rights.</li> </ul>
<p>To comply with our legal or regulatory obligations.</p>	<p>We have a legal obligation.</p>	<p>We need to establish, exercise or defend legal rights.</p>
<p>For business purposes such as maintaining management information and carrying out strategic analysis</p>	<p>We have a business need (to run an efficient business and improve our business)</p>	
<p>For financial purposes such as maintaining management information and accounting records and carrying out audits</p>	<p>We have a business need (to maintain appropriate financial records)</p>	<p>It is necessary for the purpose of handling claims</p>
<p>For business purposes such as systems development, migration of systems and live testing, diagnosing any</p>	<p>We have a business need (to run an efficient business)</p>	<p>It is necessary for the purpose of handling claims</p>

problems with our servers and website		
To exercise our right of subrogation (that is to bring an action for recovery of the claim amount we have paid against the third party who we believe caused the loss or injury)	We have a business need (to exercise our right of subrogation and recover payment from the third party who caused the loss or injury that you witnessed)	We need to establish, exercise or defend legal rights.

### **2.5.6 Who we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- The policyholder.
- Third parties involved in the incident and their legal and medical representatives.
- Other insurers that are involved in the claim.
- Other third parties involved in the incident from an insurance administration perspective such as brokers, insurers, claims handlers, loss adjusters, and business partners.
- Third parties we have appointed to assist us in relation to the incident you witnessed such as medical experts, medical screening service providers and investigators.
- Third parties who provide sanctions checking services.
- The third party against whom we are seeking recovery as part of the subrogation process and his or her legal representative.
- The third party claimant whose loss or injury you witnessed.
- Insurance industry bodies.

- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks including Insurance Link.
- Other companies in the Benefact Group.
- Our solicitors.
- Service providers we have contracted with including our subcontractors and agents, auditors, solicitors, actuaries, IT providers and database providers.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.
- Law enforcement agencies such as An Garda Síochána.
- Data Protection Commissioner (DPC)
- Our own insurers and companies who we have appointed to assist with arranging our insurance.

## **2.5 Brokers, appointed representatives and other business partners**

If you are a broker, appointed representative or another type of business partner such as a supplier or subcontractor that we do business with, this section will be applicable to you and will provide key information about how we use your personal information.

### **2.5.1 What personal information we collect?**

- Your name and title, address, telephone numbers and email addresses and date of birth.
- Employment status and related information such as job title, employment history and education.
- Bank and payment details.
- Information obtained from checking sanctions lists and credit checks such as bankruptcy orders, Personal Insolvency Arrangement, Individual Voluntary Arrangements, Office Holder Restrictions and Disqualifications or court judgements.
- Information which is available publically such as via internet search engines and social media where we need to investigate fraudulent claims.

### **2.5.2 What sensitive personal information we collect?**

Information about any criminal offences you have been convicted for and any related information including about any offences or alleged offences you have committed or any court sentences which you are subject to.

### **2.5.3 How we collect your information?**

- Directly from you and your employer.
- We will also collect your personal information from:
  - Key Regulatory Authorities such as the Central Bank
  - Third parties who provide sanctions checking services.
  - Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks.
  - Companies in the Ecclesiastical Group.
  - Public sources such as court judgments, insolvency registers, internet search engines, social media.
  - Insurance Industry Bodies.
  - Law enforcement agencies such as An Garda Síochána, The Criminal Assets Bureau and the Revenue Commissioners.

**2.5.4 What we use your personal information for?**

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We need to use your personal information to enter into a services or agency contract with you.**
- **We have a legal or regulatory obligation to use your personal information.** For example, we have obligations to carry out due diligence checks on parties we engage with.
- **We have a business need to use your personal information.** Such needs will include keeping business and accounting records, maintaining management information, statistical analysis, developing and testing our systems, analysing our business and improving the services we offer, carrying out strategic reviews of our business models and will cover all activities which are needed to carry out everyday business activities. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

When we use your "sensitive personal information" (such as information about your health, religion or criminal offences), we need to have an additional "legal ground". When using your "sensitive personal information", we will rely on the "legal grounds" set out below:

- **There is a substantial public interest** such as preventing and detecting fraud.
- **We need to use your sensitive personal information to establish, exercise or defend legal rights.** This will be applicable where we are involved in legal proceedings, either against us or where we want to instigate them ourselves or when we are investigating a legal claim that a third party brings against you.
- **You have given your explicit consent.**

**2.5.5 What are the legal grounds on which we use your personal information?**

What is the purpose for using your personal information	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
To comply with our legal or regulatory obligations.	We have a legal obligation.	We need to establish, exercise or defend legal rights.
To carry out fraud, credit and anti-money laundering checks on you.	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your services or agency contract.</li> <li>• We have a legal obligation.</li> <li>• We have a business need (to prevent fraud).</li> </ul>	It is in the substantial public interest to detect fraud.

To engage with you and obtain your services and generally communicate with you.	<ul style="list-style-type: none"> <li>• It is necessary to enter into or perform your services contract.</li> <li>• We have a business need (to respond to all communications and complaints and investigate and resolve complaints).</li> </ul>	<ul style="list-style-type: none"> <li>• We need to establish, exercise or defend legal rights.</li> <li>• You have made this public knowledge.</li> </ul>
For business purposes such as systems development, migration of systems and live testing, diagnosing any problems with our servers and website	We have a business need to run an efficient business	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering an insurance policy.</li> <li>• We have your explicit consent.</li> </ul>
For business purposes such as maintaining management information, internal audits and carrying out statistical and strategic analysis	We have a business need to run an efficient business	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering an insurance policy.</li> <li>• We have your explicit consent.</li> </ul>
For financial purposes such as maintaining management information and accounting records, carrying out audits and premium/Government Levy transactions.	We have a business need (to maintain appropriate financial records)	<ul style="list-style-type: none"> <li>• It is necessary for the purpose of administering an insurance policy.</li> <li>• We have your explicit consent.</li> <li>• It is necessary for the purpose of establishing and administering a services/agency contract.</li> </ul>

### 2.5.6 Who will we share your personal information with?

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- Third parties including the policyholder and claimant.
- Third parties who we appoint to assist with an insurance policy or claim such as claims handlers, medical experts and medical screening service providers, surveyors, investigators and loss adjusters.
- Insurers and brokers.
- Third parties who provide sanctions checking services.
- Insurance industry bodies.
- Financial crime and fraud detection agencies and other third parties who operate and maintain fraud detection registers and third parties we use to carry out credit checks including Insurance Link.
- Companies in the Ecclesiastical Group.
- Service providers we have contracted with including our subcontractors, loss adjusters, medical professionals, surveyors, investigators, engineers, agents, auditors, solicitors, actuaries, IT providers and database providers, marketing and mailing providers.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business.

- The Financial Conduct Authority and the Prudential Regulation Authority and the Central Bank who are our regulators.
- Law enforcement agencies such as An Garda Síochána. Criminal Assets Bureau and the Revenue Commissioners.
- Data Protection Commissioner (DPC)
- 
- Our own insurers and companies who we have appointed to assist with arranging our insurance.

## 2.6 Users of the Ecclesiastical websites

If you use or access the Ecclesiastical websites, this section will be applicable to you and will provide key information about how we use your personal information.

### 2.6.1 What personal information we collect?

- Name, contact details , address postcode and IP address
- Information obtained through our use of cookies. You can find more information about this in our cookies policy [here](#).

### 2.6.2 How we collect your personal information?

We collect your information directly from our website and where you have submitted any information on our website.

### 2.6.3 What we use your personal information for?

We use your information in a number of different ways, depending on your particular circumstances. For every use, we must be able to demonstrate that there is a "legal ground" to do so. When using your "personal information", we will rely on the "legal grounds" set out below:

- **We have a business need to use your personal information**, such as developing and testing our systems, analysing our business and improving the services we offer, diagnosing any problems with our website and assessing usage of our website. When relying on this legal ground, we are under a duty to assess your rights and to ensure that we do not use your information unless we can demonstrate a legitimate business need.

### 2.6.4 What are the legal grounds on which we use your personal information?

What is the purpose for using your personal information ►	Legal grounds for using your personal information ►	Legal grounds for using your sensitive personal information ►
To respond to any enquiries you make.	We have a business need (to respond to all enquiries made on our website).	-

To provide marketing materials about products and services we think you might be interested in.	We have a business need (to inform you about other services we offer).	-
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2.6.5

**Who we share your personal information with?**

We do not share or distribute your personal information other than to the following third parties and only under the limited circumstances we have set out above:

- Other companies in the Benefact Group.
- Service providers we have contracted with relating to the website such as our subcontractors and agents and website providers.

**3. What marketing activities do we carry out?**

We may use your personal information to provide you with information about our services or to send you newsletters and risk guidance which may be of interest to you where you are an existing client, policyholder or where you have provided your consent for us to do so.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you no longer wish to receive information from us and want to be removed from our standard mailing list you can contact us by post or email using the details set out in section 9.

Please note that by stopping these communications you may not hear about a new product or services or additions to our insurance that may save you money.

Please note that, even if you opt out of receiving marketing messages, we may still send you communications which are relevant to the type of services we provide you with.

**4. Automated Decision-Making**

We do not make automated decisions, which are decisions automatically made after inputting your personal information into a computer and the decision is reached using certain processes and algorithms. Our employees make all of the decisions.

**5. How long do we keep personal information for?**

We will only keep your personal information for as long as reasonably necessary to fulfil the purposes set out in section 2 above and to comply with our legal and regulatory obligations.

For example, we keep property claims files for at least 6 years and where long term liability claims may arise we keep policy information for at least 80 years.

If you would like further information about how long we will keep your personal information for, please

contact us using the details set out in section 9.

## 6. What is our approach to sending your personal information overseas

There may be some instances where your personal information is transferred to countries outside of the European Economic Area ("EEA") such as when we transfer information to our other companies in the Benefact Group or to third party suppliers who are based outside the EEA or when third parties who act on our behalf transfer your personal information to countries outside the EEA.

Where such a transfer takes place, we will take the appropriate safeguarding measures to ensure that your personal information is adequately protected. We will do so in a number of ways including:

- entering into data transfer contracts and using specific contractual provisions that have been approved by European data protection authorities otherwise known as the "standard contractual clauses";
- transferring personal data only to companies in the United States who are certified under the "Privacy Shield". Privacy Shield is a scheme whereby companies certify that they provide an adequate level of data protection. You can find out more about Privacy Shield [\[here\]](#) or
- we will only transfer personal data to companies in non-EEA countries who have been deemed by European data protection authorities to have adequate levels of data protection for the protection of personal information. You can find out more about this [\[here\]](#)

We are also entitled under European data protection laws to transfer your personal information to countries outside the EEA in the following circumstances:

- it is necessary for the performance of the contract we have with you
- it is necessary to protect your vital interests i.e. it is a life or death situation.

Depending on our relationship and your particular circumstances, we might transfer personal information anywhere in the world. A summary of our regular data transfers outside the EEA is set out below:

Country of transfer	Reason for the transfer	Method we use to protect your information
Israel	Our insurance and reinsurance processing platform currently under development is provided by a company based in Israel.	Israel has been deemed to offer an adequate level of data protection by the EU.
Worldwide	If you have a travel policy with	We will rely on the

	<p>us and you need assistance when you fall ill on holiday, we will need to instruct medical experts or other service providers in the country where you are situated to ensure that you receive appropriate medical services</p>	<p>exemptions under European data protection laws because it is necessary to transfer your personal information so that we can provide you with medical services under your travel policy or it is a life or death situation and it is in your vital interests.</p>
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If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please contact us using the details set out in section 9.

## 7. How do we protect your information?

**We implement and maintain appropriate technical and organisational measures to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.**

- We adopt a framework of information security controls operating at different levels within the company to restrict access and safeguard systems, in accordance with a 'defence in depth' methodology (which is the coordinated use of multiple security controls to protect the integrity of the information and assets in the company's IT network);
- We have an established documented information security and data protection policy framework which is regularly reviewed to consider changes in technology, regulations and threats;
- We maintain encryption technologies to encrypt data stored on portable computers and portable media and ensure security when data is transferred;
- We maintain awareness and education on information security and data protection in all areas of our business;
- We conduct risk based due diligence on our suppliers;
- We operate a programme of testing the effectiveness of our information security measures.

## 8. Your Rights

You have several data protection rights which entitle you to request information about your personal information, to dictate what we do with it or to stop us using it in certain ways.

If you wish to exercise the rights set out below, please contact us at any time using the details set out in section 9. There will not normally be a charge for this.

We respect your rights in relation to personal information we hold about you, however we cannot always comply with your requests, for example:

- we may not be able to delete your information if we are required by law to keep it for a longer period of time; or
- we may not be able to provide a copy of your personal information if it is subject to legal advice privilege, would circumvent the civil procedure rules applying to litigation or would prejudice our negotiating position; or
- we may not be able to delete your information if we delete your information we would not have the necessary information we need to provide insurance cover or pay out on a claim.

However we will always inform you why we cannot comply with your request.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued.

### **The right to access your personal information**

You can request a copy of the personal information we hold about you and certain details of how we use it.

Your personal information will normally be provided to you in writing unless you request otherwise or where you have made a request by electronic means such as email, we will provide such information in electronic form where possible.

### **The right to withdraw your consent**

Where we rely on consent as the legal ground to use your personal information, you are entitled to withdraw that original consent.

Please note that for certain uses of your personal information, we need your consent in order to provide your policy or handle a claim. If you exercise this right and withdraw your consent, we may need to cancel your policy or we may not be able to pay your claim. We will inform you of these consequences when you withdraw your consent.

### **The right to rectification**

We make reasonable efforts to keep your personal information where necessary up to date, complete and accurate. We encourage you to ensure that your personal information is accurate so please regularly let us know if you believe that the information we hold about you may be inaccurate or not complete. We will correct and amend any such personal information and notify any third party recipients of necessary changes.

### **The right to restriction of processing**

Subject to the circumstances in which you exercise this right, you can request that we stop using your personal information, such as where you believe that we no longer need to use your personal information.

### **The right to data portability**

Subject to the circumstances in which you exercise this right, you can request that we port across personal information you have provided to us to a third party in a commonly used and machine-readable format.

### **The right to erasure**

You can request that we delete your personal information. For example, where we no longer need your personal information for the original purpose we collected it for or where you have exercised your right to withdraw consent.

Whilst we will assess every request, this request is subject to legal and regulatory requirements that we are required to comply with.

### **The right to object to direct marketing**

You can request that we stop sending you marketing messages at any time by contacting using the details set out in section 9.

Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.

### **The right to object to processing**

Where our processing is based on the legal ground of us having a legitimate business need to process your personal information, you can object to such processing. If you raise an objection, we will consider your request and balance this against any other compelling legitimate grounds in favour of the processing and inform you of our decision.

### **Rights relating to automated decision-making**

We do not make automated decisions. All of our decisions are made by our employees.

### **The right to make a complaint with the Data Protection Commissioner**

Where you believe that we have breached data protection laws when using your personal information, you can complain to the Data Protection Commissioner (DPC). For more information visit their website at [www.dataprotection.ie](http://www.dataprotection.ie)

Please note that exercising this right and lodging a complaint will not affect any other legal rights or remedies that you have.

## **9. Contacting us**

If you would like further information about the ways we use your personal information, further clarity on how we use your personal information or anything referred to in this notice, please contact our Compliance Associate by telephone on 01 6190300 at [compliance@ecclesiastical.com](mailto:compliance@ecclesiastical.com) or by writing to the Compliance Associate at Ecclesiastical Insurance Office plc, 2<sup>nd</sup> Floor, Block F2, EastPoint, Dublin 3. D03 T6P8.

## **10. Updates to this notice.**

We are continually improving our methods of communication and alongside changes in the law and the changing nature of technology, our data practices and how we use your data will change from time to time. If and when our data practices change, we will notify you if you are a customer of Ecclesiastical and we will provide you with the most up-to-date notice. You can view it by checking our website [here](#).

This notice was last updated on 8 March 2022