Privacy Notice for Claims Handling

Privacy Notice

OUTsurance DAC ('OUTsurance' or We), is a member of the global OUTsurance Group ('Group'). We are established in Ireland to undertake and carry out insurance business against non-life risks and liabilities, including home and motor insurance. OUTsurance is regulated by the Central Bank of Ireland, registered under company number 724743, and our headquarters are located in County Dublin, Ireland.

OUTsurance understands how important it is for you that we protect your personal information, including sensitive data, and we appreciate that you care about how we collect, use, store, and share such information.

This Privacy Notice explains the personal information we collect from you when we are processing a claim, how we handle your data, as well as information we may receive from others. We are committed to processing all personal data in accordance with applicable data protection laws, including the EU General Data Protection Regulation (GDPR) and the Data Protection Acts.

Other People's Personal Data

As well as collecting your personal data, we may also use personal information about other people in connection with claims handling, for example your family members such as children/ minors, other adult witnesses, limited personal information about trustees/beneficiaries (where policies are under trust), executors, nominated representatives and attorneys (under power of attorney).

If you are providing OUTsurance with personal information about another person in paper, or electronic format, or video or voice recording, we require you to let them know what information you have shared with us, share this data privacy notice with them and ensure that they have given you permission to provide their information to us. If you, or they, have any concerns, please ask them to contact us in one of the ways described in this notice.

Special categories of data of other people will be processed only if they are necessary for the provisions of a policy of insurance and for the establishment, exercise, or defence of legal claims or whenever courts are acting in their judicial capacity.

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1. Queries and complaints

If you have concerns regarding the handling of your personal information or require further details about how your data are used, please feel free to reach out to us using the contact details below:

Data Protection Officer

OUTsurance Ireland DAC

Building 3, Level 2

Cherrywood Campus

Cherrywood

Dublin 18

D18 TF72

Email: DPO@outsurance.ie

You also have the right to file a complaint with the Data Protection Commission if you are not satisfied with how we manage your personal data. Here's how to contact them:

Data Protection Commission

6 Pembroke Row

Dublin 2

D02 X963

Email: info@dataprotection.ie

2. Collection of data

We collect personal data about you, as described in this Privacy Notice. This information may be collected directly by OUTsurance staff, directly from you or your representatives, or indirectly through insurance industry databases. The specific types of personal data we collect are outlined below. To handle your claim, we may collect personal information directly from you, from other insurers, or from others insured under your policy. These data are collected to fulfill the purposes outlined in this Privacy Notice.

The specific types of data we collect may evolve over time, but we believe it is important for you to understand the kinds of information we gather and use. The categories and examples of data listed below are not exhaustive and serve as an indication of the types of data we may process. Information under one category may also be used for activities related to other categories.

The majority of these data are obtained directly from you. This can be through different channels such as contact centres, e-mail, post. Personal data are also obtained from other sources such as third-party databases and public websites.

We use these databases and websites to obtain additional details to help verify personal data and other information you have provided. Further information about these channels is set out below. Data collection may involve information about both you and other insured individuals, such as named drivers, or those residing with you at an insured property.

Personal data provided by	Details	Categories and Types of Data Collected
Indirect Engagement	We collect your personal data indirectly from third party service providers in certain circumstances. These parties include: • Other insurance companies; • Any third parties involved in an incident with you; • People connected with you, such as those who live with you in an insured property; nominated representatives or third parties relevant to you or to the claim • Members of the public (where dashcam footage is viewed) • Public registers (e.g. Companies Registration Office) • Industry Databases • Other OUTsurance records if you have a policy of insurance with the company • Insurance Ireland • Any party such as solicitor or GP whom you have authorised to speak with us • Official authorities (e.g. An Garda Síochána, the ambulance or fire services, Department of Employment Affairs and Social Protection, the Injuries Board (formerly PIAB) • 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 • From use of third party cookie data on our website (see our Cookie Policy for full details)	We use these databases, websites and sources to obtain additional details; to help verify personal data and other information you have provided

Direct Engagement with You	We collect your personal data directly from you when you: • Contact our claims agents • Submit a claim • Request any information from us; and/ or • Engage with us via phone, email, post	Name, address (including Eircode), date of birth, contact details, gender, marital status of you and others insured under the policy, PPS Policy numbers, vehicle and property details, premium information, and renewal dates (including with other insurers). Voice data of you or your authorised personal representative in call recordings. Driving and claims history: Driver license details, penalty points (number, date of incident, and effective date), disqualifications, criminal convictions, and prior claims or non-fault incidents. Bank and payment card details, VAT and tax numbers, records of payments and arrears. Employment details, telephone recordings, location data, marketing preferences and CCTV footage from our offices. Health-related data in the context of claims and where it affects your ability to drive (please do not send us genetic test results) Other details requested such as vehicle registration, make and model

Third Party Database	Details	Categories and Types of Data Collected
Insurance Link	This database contains information relating to claims (i.e. Claims Data). It is a shared insurance industry database that allows its users (i.e. insurance companies, self-insurers, and statutory authorities) to gather, share and compare recorded claims with claims history information provided by new claimants against policyholders. Personal data shared on Insurance Link may be shared with other insurance companies, self-insurers, or statutory authorities. For more information please visit https://www.inslink.ie.	We use these databases and websites to obtain additional details, to help verify personal data and other information you have provided.

All the above data are necessary for the purposes outlined below in Section 3: "Use of Information."

If you require further details about the specific types of information we collect and process, please contact us (details in Section 1: "General").

Please note that where you provide personal data relating to any child under the age of 16 years, we will seek to verify that you are the parent or guardian of that child. This is to ensure that you are able to authorise the processing of personal data relating to that child to enable us to deal with any claim

3. 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 bases for the collection of data. At least one valid legal basis is required in all cases where OUTsurance seeks lawfully to process personal information in line with data protection law. We use your personal information primarily to provide you with a quote, to set up and manage your policy, and to process claims as part of the insurance contract.

The table below sets out the types of information we collect and process and the legal bases for doing so. When relying on our legitimate interest, or a third party's, we will ensure the purpose is legitimate, that processing is necessary to the legitimate interest, inform you at the time of collection, balance our interests with your interests and uphold your fundamental rights and freedoms. For certain uses of your personal information, we may ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information (see Section 6: Your rights). Withdrawal of consent would not invalidate any processing we carried out prior to your withdrawal of consent. Please note that in some cases we may not be able to process your insurance if you withdraw your consent.

Use of Information	Legal Bases
Identity Verification: To confirm your identity (or that of your authorised representative) when you interact with us, whether in person, by phone, online, or in other situations where necessary.	This processing is necessary to comply with legal obligations; for the performance of a contract of insurance
Verify Information Accuracy: To ensure the information we receive is correct	This processing is necessary to perform the insurance contract
To record you as claimant as well as to administer the claim up to and including payment / settlement of same	This processing is necessary to perform the insurance contract, or to comply with a legal obligation
Payments : To process payments related to your claims	This processing is necessary to perform the insurance contract, to comply with legal obligations
Claims processing and management: To manage and investigate any claims made by you or if you are a witness to an incident. We will need to collect information to help validate and administer the claim and to take all other steps associated with dealing with the claim including legal proceedings, or a claim to The Injuries Resolution Board (IRB) . If you are making a claim following a road traffic incident we will ask for details, validate your claim or check the details.	This processing is necessary to perform the insurance contract, or to comply with a legal or regulatory obligation.
To obtain reinsurance for the business we underwrite and to manage and facilitate reinsurance processes.	The processing is based on our legitimate interest.

To contact you with feedback surveys	This is in the legitimate interests of OUTsurance to improve our services
Staff Training and Management: For staff and quality training, performance assessments, and disciplinary purposes	This processing is necessary for compliance with regulatory and legal obligations and to perform an insurance contract, as well as for our legitimate business interest
Fraud Prevention, including the prevention and detection of fraudulent and exaggerated claims, financial crime prevention, sanctions checking and Legal Compliance: To detect and prevent fraud, money laundering, and other illegal activities, and to assist law enforcement or other investigative bodies, and to meet our regulatory obligations	This processing is necessary for our legitimate interest in preventing fraud and other illegal activities, and to comply with legal and regulatory obligations and or to perform a task in the public interest
Complaint Management: To handle, investigate and resolve complaints including complaints to the FSPO	This processing is necessary to perform the insurance contract and comply with legal and regulatory obligations
Data Subject Access Requests: to handle and process any request by data subjects under the GDPR	This processing is necessary to comply with legal obligations.
Statistical and Product Improvement: To conduct statistical analyses and improve our products, services, and systems. The creation of models and profiles for purposes such as pricing, fraud prediction, evolution of claims, monitoring of quality standards, customer's suitability for the product and determination of premium.	This processing is necessary for our legitimate interest and may also be necessary to comply with legal and regulatory obligations.
To manage data subject requests pursuant to data protection legislation	This processing is necessary to comply with legal and regulatory obligations
OUTsurance Group Reporting: To meet internal reporting requirements within the OUTsurance Group, and auditing requirements, when necessary	This processing is necessary for our legitimate business operations and to comply with legal and regulatory obligations
Data Storage and Backup and Security: To store personal data and create backups for emergency and disaster recovery purposes; for testing business continuity plans and disaster simulation	This processing is necessary to perform the insurance contract and to comply with legal obligations as well as our legitimate business operations
Compliance with Laws and Regulations: To ensure compliance with all applicable laws and regulations	This processing is necessary to comply with legal and regulatory obligations, as well as to perform the contract

4. Fraud Prevention and Detection

OUTsurance's policy is to take all reasonable, lawful steps to prevent fraud, including application fraud and fraudulent or exaggerated claims. We may use your personal information to allow us to prevent and detect fraudulent claims and to fight financial crime, as well as to meet our regulatory obligations. This may involve checking public registers e.g. the electoral roll, or registers of court judgments, bankruptcy orders or repossessions, conducting online searches of websites, social media and other information sharing platforms for more details, our own company records and or those of other reputable organisations.

We may check the validity of your insurance details with your previous insurer. This will help us verify your identity, make decisions about providing you with our products and related services. We may also share your information and undertake searches with third party organisations such as An Garda Siochana, public bodies, fraud prevention agencies and our regulators (which include the Central Bank of Ireland, Financial Services Ombudsman and the Data Protection Commission). If you give us false or inaccurate information and we suspect fraud, we will record this to prevent further fraud and/ or money laundering and this information will be shared with our OUTsurance colleagues to prevent further fraud from occurring.

Various anti-fraud databases, including InsuranceLink, have been created to assist the Irish insurance industry in our collective mission to detect and defend against claims that are exaggerated and fraudulent. Such claims have a negative impact on the customers of insurance companies as they can lead to insurance costing more for our genuine customers. The InsuranceLink database contains details of claims made by individuals in relation to personal injuries and damage to property. Further information on Insurance Link may be found here: .InsuranceLink Information

Where applicable, we check third parties claiming against our insureds. We use data points such as First name(s), Surname(s), Date of Birth, Address and Vehicle details when searching for claims. We may also manually review claims history on InsuranceLink if required.

We will also pass details of claims made (including name, address, date of birth and type of injury or loss suffered) to the organisations that manage the databases. This information will then be available to other insurers. If we receive a request from another insurance company in relation to a claim we have uploaded to the databases, we may provide certain limited information in relation to the claim to that insurance company.

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5. Sensitive data

When we process sensitive personal data (such as information related to criminal convictions or offenses), it is only done when necessary to assess risk, prevent fraud, or for legal claims.

For other special categories of sensitive data (such as health information), we will only process it with your explicit consent, or when necessary for legal claims, or to protect someone's vital interests if they are unable to give consent.

6. Automated decision-making

As part of the claim handling, we may use automated decision-making. If you are making a claim, we may use profiling and other forms of automated processing to help us assess if your claim may be fraudulent and we may use your sensitive information to carry out this assessment. If you wish to review an automated decision, please contact us at dpa@outsurance.ie

As part of the claims-handling process, we may use automated decision-making. If you are making a claim, we may use profiling and other forms of automated processing to assist us in assessing whether your claim may be fraudulent. We may use sensitive information in carrying out this assessment. Some of the benefits of automated processes include allowing greater consistency and fairness (e.g. by reducing the potential for human error and discrimination) and a more efficient decision- making process. Where sensitive personal information is relevant to the profiling, your sensitive personal information may also be used in the profiling models. OUTsurance uses reasonable endeavours to ensure that data you provide us with is recorded accurately and checks the analytics for hidden bias. We also have measures in place to verify and ensure, on an ongoing basis, that data reused or obtained indirectly is accurate and up to date.

6.1 Right to review automated decisions

If an automated decision significantly impacts you or has legal consequences, you have the right to request human intervention, challenge the decision, and provide additional context. For more information, see Section 8: Your Rights

6.2 Impact of not providing information

If you fail to provide the necessary information to support your claim, we may be unable to process it and this may negatively impact your claim.

6.3 Call recording and email monitoring

We may record or monitor phone calls to ensure accurate records of your instructions, to train staff, to prevent fraud, to manage complaints, and to improve customer satisfaction. We also monitor email communications received from our clients and third parties, to ensure they are safe.

4. Sharing of Information

We may share your personal data with various parties under certain circumstances. Typically, this includes your representatives, our representatives, and other parties involved in claims processes.

We must share personal data on insured persons to third party databases, our service providers, staff, agents, Government/statutory/regulatory bodies. We may also share your personal data during the insurance process on third party databases to verify certain personal data that you have provided to us. Further information on such sharing is set out below.

Third Party Database	Details about sharing personal data
Insurance Link	Database containing information relating to claims (i.e. Claims Data). It is a shared insurance industry database that allows its users (insurance companies) to gather, share and compare recorded claims with claims history information provided by new claimants against policyholders. Personal data shared on Insurance Link may be shared with other insurance companies, self-insurers, or statutory authorities. For more information, please visit https://www.inslink.ie. Details of claims involving you may also be shared with InsuranceLink.
Motor Insurance Bureau of Ireland	Governing authority which deals with motor accidents which are committed by uninsured or unidentified persons, or which involve foreign vehicles.
National Vehicle and Driver File	Database containing a register of all vehicles and drivers of vehicles in Ireland
Injuries Resolution Board (formerly PIAB	Independent State body which assesses personal injury compensation
The Irish Motor Insurance Database (comprising the Motor Third Party Liability Database (MPTL) and the National Fleet Database (NFD)	This database provides a single point of reference for motor vehicles insured in Ireland. The data is provided by insurers, brokers, fleet owners and motor traders. The data includes policy holder details, vehicles registration numbers and names of drivers that are permitted to drive the vehicles that are covered by each policy. The IMID is managed by the MIBI and the data is shared with the Department of Transport and An Garda Síochána as set out in Section 78A of the Road Traffic Act. Also included are the driver numbers of every insured driver. This information helps enhance road safety, providing An Garda Síochána with a more comprehensive insight into any offences a driver may have committed – making it even more difficult for drivers who act illegally on Irish roads to evade detection.

At various stages of processing your claim, we may consult these databases to check for prior claims involving you, named drivers, or third parties. Other entities we share your personal data with can be found in the table below. Please note that some third parties may keep their own record of personal data obtained (e.g. Insurance Link). Please check the Data Protection Notices of these third parties if you want more information about how they process personal data.

We may have to share some or all of your personal data with the parties listed below. Please note that this list is non- exhaustive, as the parties may change from time to time.

Recipient	Details about sharing personal data
Our staff or agents	• Internal/External staff of OUTsurance DAC and the OUTsurance Group • Contractors • Other members of the OUTsurance Group in our claims, customer service, quotation, underwriting departments, and support departments • Prospective buyers or sellers if we choose to buy or sell any business or assets
Witnesses	• Witnesses to any incidents/accidents in which you are involved including expert witnesses and witnesses as to fact
Our insured and their Legal or Medical representatives	• Our Insured's, intermediary, legal representatives, doctor or expert
Any Party You Have Given Us Permission to Speak to	• Policyholder's representative • Policyholder's intermediary • Policyholder's solicitor • Policyholder's public loss assessor • Policyholder's relative or friend
Other Insurers and Their Agents	• Other insurers directly or via those acting for the insurer such as loss adjusters
Other Insurers and Their Agents	• Other insurers directly or via those acting for the insurer such as loss adjusters
Government, Regulatory and Statutory Bodies	• Department of Transport • Data Protection Commission • Revenue Commissioners • Central Bank of Ireland • Financial Services and Pensions Ombudsman (FSPO) • Industry and trade bodies • An Garda Síochána • Injuries Resolution Board (formerly PIAB) • The Courts Service of Ireland

All the above data are necessary for the purposes outlined in Section 3: "Use of Information." If you require further details about the specific types of information we collect and process, please contact us (details in Section 1:"General").

7. Safeguarding your data

When working with third-party service providers, we ensure they process and store your data securely and in compliance with appropriate legal standards. As the Data Controller, OUTsurance prioritises protecting your data and does not sell your personal information to third parties.

We have put in place measures to protect the security of your personal data and Special Categories of personal data. Details of these measures are available upon request. In addition, we limit access to your personal data and Special Categories of personal data to those employees, agents, contractors and other third parties who have a business need to know.

Third parties acting on our behalf or other third parties such as loss adjusters, assessors, amongst others will only process your personal data and special categories of personal data on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

7.1 International data transfers

Occasionally, personal data may be transmitted outside the European Economic Area (EEA) to OUTsurance Group companies or third parties. These transfers are conducted securely and in compliance with data protection laws. Processing also occurs within the EU. For additional information on international data transfer safeguards, visit the European Commission's website or contact us.

5. Retention of Data

We follow a detailed record retention schedule, with retention periods varying based on the purpose of the data processing and the type of information. Our Policy is only to 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 example, 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. We will also retain files if we reasonably believe there is a prospect of litigation.

Below is a general guide to our retention periods:

Type of Record	Retention Period
Data related to Potential or Actual Claims Taken Out on a Policy	10 years after the full and final settlement has been agreed.
Data related to Potential or Actual Claims Taken Out on a Policy where a child is involved	The later date of 10 years after the child turns 18, or the full and final settlement date has been agreed
Data related to Potential or Actual Claims Taken Out on a Policy where a child is involved	Where a data subject makes an access request, we will retain the data relating to that request for a period of 18 months from the date the request is satisfied

In some situations, we may retain personal data beyond these periods, such as for long-running disputes or in system backups used for disaster recovery.

This information is stored separately from other policy and claims data and is only accessed if a new claim arises.

After the retention periods outlined above, we will either delete or de-personalise your data. De-personalisation involves removing identifiable details (e.g., name, street address) so the data no longer qualifies as personal information, in which case we may use such information without further notice to you. These data may be used for research or analytical purposes. In certain circumstances, we may need to retain some information to ensure all of your preferences are properly respected and or to ensure that we abide by legal and regulatory requirements.

For further details on retention periods, feel free to contact us (see Section 1: "General").

6. Your Rights

As a data subject, you have rights regarding your personal data, as outlined below. In some cases, these rights may be subject to restrictions.

To exercise your rights, please submit a written request to the contact details provided in Section 1: General. Please include sufficient information for us to process your request, such as proof of identity.

Response Time:

Requests are typically processed within one month. If additional time is needed (up to two more months), we will notify you of the delay and explain the reasons. If we refuse your request, we will inform you within one month and explain why. You can lodge a complaint with the Data Protection Commission if you disagree with the decision.

Fee Policy:

Requests are free unless deemed excessive or unfounded, in which case we may charge a fee or refuse the request. A fee may also apply if you request additional copies of your data.

6.1 Summary of Your Rights

6.1.1 Right to Withdraw Consent:

You can withdraw your consent for processing at any time. While this does not affect past processing, it prevents further processing for the specified purpose. Note that we typically rely on other legal bases, not consent, for processing insurance-related data.

6.1.2 Right of Access:

You can request details about the personal data we hold, why we process it, and obtain a copy. Providing as much identifying information as possible (e.g., name, address, policy number) helps us locate your data efficiently.

6.1.3 Right to Rectification:

You can request corrections to inaccurate or incomplete data. Keeping your information accurate is also a condition of your insurance policy.

6.1.4 Right to Erasure (“Right to Be Forgotten”):

In certain circumstances, you can request the deletion of your personal data, such as when:

- The data are no longer needed for their original purpose.
- You withdraw consent (where applicable).
- The data were unlawfully processed.
- Legal obligations require deletion.

Exceptions apply, such as when data are necessary for compliance with legal obligations, statistical purposes, or defending legal claims.

6.1.5 Right Not to Be Subject to Automated Decision-Making:

You can object to decisions made solely by automated means if they significantly impact you. In such cases, you can request a manual review and provide your perspective.

6.1.6 Right to Data Portability:

You can request a copy of your data in a machine-readable format or have it transferred to another service provider. This applies only to data processed with your consent or for a contract.

6.1.7. Right to Object:

If we process your data based on public or legitimate interests, you can object to the processing. We will stop unless compelling legitimate grounds override your objection or the data are required for legal claims

6.1.8 Right to Restrict Processing:

You can request restrictions on processing in specific circumstances, such as when data accuracy is disputed or processing is unlawful but you prefer restriction over deletion.

Note: Exercising certain rights may affect the services we provide in respect of an ongoing claim.