



Privacy Notice Job Applicants



This Privacy Notice explains how OUTsurance DAC (“we”, “us”, “our”) collects and uses personal data about individuals who apply for roles with us. It applies to **all job applicants**, whether the role is administrative, operational, managerial, customer-facing, technical, or a regulated function within the insurance sector.

This includes applications submitted directly or through third-party platforms such as LinkedIn, Indeed, jobs.ie, recruitment agencies, or other job boards.

Who We Are

OUTsurance DAC trading as OUTsurance is regulated by the Central Bank of Ireland.

Registered in Ireland No. 724743. Registered Office: Cherrywood Business Park, Dublin, Ireland, D18 TF72.

We are the Data Controller for the personal data processed during recruitment.

If you have questions about how we process your personal data during the recruitment process, please contact: dpo@OUTsurance.ie

Personal Data We Collect

For all roles, we may collect:

- Name and contact details
- CV, employment history and qualifications
- Interview notes and assessment results
- References
- Salary expectations and availability
- Information you share during interviews
- Supporting documents you provide

We may access private information from your profile depending on the role being recruited for.

Additional Information for Some Roles

If you apply for a role that is subject to Central Bank of Ireland (CBI) regulation, including Fitness & Probity (F&P) or Pre-Approval Controlled Functions (PCFs), we may also collect information needed to assess:

- Honesty, integrity and reputation
- Financial soundness
- Competence and capability
- Regulatory or disciplinary history
- Professional certifications and qualifications
- Background or criminal record checks (only where lawful and necessary)
- Details required for CBI Individual Questionnaire (IQ) forms for PCFs
- Regulatory references (taken at the appropriate stage)

We will clearly inform you if the role you are applying for is regulated.

Where relevant to the role, we may also collect information relating to membership of professional, regulatory or accreditation bodies, such as:

- Chartered Accountants Ireland
- The Law Society of Ireland
- The Society of Actuaries in Ireland
- Insurance Institute of Ireland
- LIA (Life Insurance Association)
- Or any similar body relevant to the position applied for

This may include membership status, dates of qualification, disciplinary history (where applicable), practising certificates, or CPD compliance information.

Minimum Competency Code and Regulations (MCC/MCR)

If the role requires compliance with the Minimum Competency Code (MCC) or Minimum Competency Regulations (MCR), we may collect and verify information relating to:

- Relevant qualifications (e.g., APA, CIP)
- Grandfathered MCC status if applicable
- Evidence of Continuing Professional Development (CPD)
- Professional membership or accreditation details

For roles within scope of MCC/MCR, we may verify professional body membership (for example, The Insurance Institute) to confirm qualification status or CPD compliance.

How We Use Your Personal Data

For all applicants, we use your personal data to:

- Process and assess your application

- Review qualifications and experience
- Communicate with you about your application
- Arrange interviews and assessments
- Make recruitment decisions
- Verify information you provide
- Maintain appropriate records of the recruitment process
- Comply with legal, regulatory, tax or audit obligations

For insurance-regulated roles, we may also use your information to:

- Assess compliance with Fitness & Probity requirements
- Evaluate MCC/MCR qualification status
- Complete regulatory filings with the Central Bank of Ireland, where required

We do not use applicant data for marketing.

Our Legal Basis for Processing

For all roles

We rely on:

- Legitimate interests – managing our recruitment process
- Contractual necessity – taking steps prior to entering an employment contract
- Legal obligation – e.g., right-to-work checks

For regulated insurance roles and some other roles we may additionally rely on:

- Legal obligation – compliance with CBI regulatory requirements
- Substantial public interest – where the law permits background or criminal record checks
- Legitimate interests – ensuring candidates meet regulatory standards

Where we rely on consent (e.g., keeping your CV on file for future opportunities), we will ask for it clearly and separately.

Where We Get Your Information

We may receive personal data from:

- You directly
- Recruitment platforms (LinkedIn, Indeed, Jobs.ie)
- Recruitment agencies
- Referees (with your awareness)
- Background screening providers (for regulated roles)
- Educational or professional bodies (where verification is required)
- Regulatory authorities, if necessary and lawful
- Professional or regulatory bodies, such as:
 - Chartered Accountants Ireland

- o The Society of Actuaries in Ireland
- o The Insurance Institute of Ireland
- o Or any similar body, where verification is required and lawful
- Regulatory authorities (where legally required)

We will only contact a professional body for verification where the law permits, where it is relevant to the role, and typically with your knowledge (for example, during F&P or MCC checks).

Who We Share Your Data With

We may share your personal data with:

- Recruitment platforms or agencies facilitating your application
- HR or background-screening service providers
- IT and cloud service providers supporting our recruitment systems
- Educational and professional bodies (for role-specific qualification checks)
- The Central Bank of Ireland, where regulatory filings or confirmations are required
- Other law-enforcement bodies if legally required
- Professional or regulatory bodies where verification of qualification, practising status or CPD is required for the role. We will never disclose more information to a professional body than is necessary to verify your membership, standing, CPD status or qualifications.

We never sell applicant data.

How Long We Keep Your Data

- If you are unsuccessful, we typically keep your application for up to 12 months
- For regulated roles, certain information may need to be kept longer to meet CBI or legal requirements
- If we want to retain your details for future opportunities, we will ask for your consent
- If you become an employee, your applicant data becomes part of your personnel file

Applications Through Third-Party Recruitment Platforms

Please note that if you apply for a role with our company through a third-party platform (such as LinkedIn, Indeed, IrishJobs.ie, or a recruitment agency), please be aware that these organisations are independent data controllers. This means they determine how they collect, use and store your personal data for their own purposes, in addition to passing your application to OUTsurance DAC.

We do not control, supervise or take responsibility for how these platforms process your personal data. Their processing is governed by their own privacy notices, terms of use and cookie policies, which we encourage you to review carefully.

How These Platforms Handle Your Personal Data

Depending on your settings and how you use these platforms, they may:

- Store your application history
- Track jobs viewed or applied for
- Display your application status

- Share parts of your profile with employers
- Use your data for advertising or analytics
- Recommend additional roles
- Retain your profile or CV even after you delete the application with us

We do not receive or access any information on how they conduct these activities.

How You Can Manage or Minimise This Processing

If you wish to limit how these platforms process your personal data, you may consider:

- Reviewing and adjusting your privacy settings on the platform
- Restricting the visibility of your profile (e.g., setting LinkedIn to private)
- Deleting uploaded CVs or cover letters once no longer needed
- Removing saved information or stored application history
- Updating your communication preferences
- Closing or deactivating accounts you no longer use
- Contacting the platform directly to exercise GDPR rights (e.g., access, deletion, restriction, objection)

Most platforms provide detailed help pages explaining how to manage and delete personal data from your account.

Information We Receive from These Platforms

We only receive the information that you submit as part of your application, such as:

- Your CV
- Profile information included in the application
- Cover letters or screening questions
- Messages sent to us through the platform

We do not access or receive any optional profile data, behavioural data, or analytics data that these platforms may hold about you.

Automated Decision-Making

We do not make hiring decisions based on automated processing or profiling.

CCTV

In cases where you attend an onsite job interview, your images will be captured by our CCTV, as well as CCTV installed by the landlord. The purposes of the CCTV are to deter and detect unauthorized access to the property, to protect building occupants and their property and to provide evidential material for court proceedings should these arise. The landlord's CCTV is controlled by the landlord and images kept for no more than 30 days unless required to investigate an incident. Images in the OUTsurance office are kept for no more than 30 days unless required to investigate an incident.

Updates to This Notice

We may update this Privacy Notice from time to time. The latest version will always be available on our website or on request.

Your Rights

You have the right to:

- Access your personal data
- Correct inaccurate information
- Request deletion (in certain circumstances)
- Restrict or object to processing
- Withdraw consent (where applicable)
- Request a copy of your data in a portable format

To exercise your rights, contact our Data Protection Officer at dpo@OUTsurance.ie

If you are unhappy with how we use your data, you can complain to the Data Protection Commission: www.dataprotection.ie