



Social Media Privacy Notice



This notice explains how OUTsurance DAC uses personal data when you interact with us on social media platforms including **Instagram, Meta (including Facebook), X (formerly Twitter), LinkedIn and YouTube.**

Who We Are

OUTsurance DAC trading as OUTsurance is regulated by the Central Bank of Ireland. OUTsurance is responsible for how your personal data is used by OUTsurance DAC when you engage with our social media accounts.

Contact: Data Protection Officer: dpo@OUTsurance.ie

When This Privacy Notice Applies

This notice covers what happens when you:

- Follow or connect with us
- Like, share, or comment on our posts
- View our videos
- Send us messages
- Mention or tag us

Social media activity is governed by internal policies, approval workflows, staff training, and oversight mechanisms to ensure that communications are fair, clear and not misleading, and that consumer data is processed lawfully and securely.

Each social media platform mentioned above also uses your data in its own way when you utilise the platform. They each have their own privacy policies.

What Data We Process and for What Purposes

Social media platforms (including **Instagram, Meta (including Facebook), X (formerly Twitter), LinkedIn and YouTube**) are used to:

- Advertise and promote the brand and insurance products and services
- Publish corporate and educational content
- Engage with members of the public, policyholders and staff
- Respond to general enquiries
- Support recruitment and employer branding
- Post information on staff members in relation to their activities under their respective roles

Depending on how you interact with us and your account settings, we may see or use:

- Your public profile information (such as your username)
- Comments, messages, reactions, and mentions
- Any other personal data that you make available on the platform
- General engagement statistics provided by the platform

We do not intentionally collect sensitive personal information and would ask that you do not provide us with any sensitive information via our social media accounts. However, it cannot be excluded that users of social media platforms post information that would fall within the special categories of personal data. This is not under the control of OUTsurance and would fall outside our intended use of such platforms as described in this Privacy Notice.

Why We Use Your Data

We use your data to:

- Run and manage our social media pages and maintain an online presence
- Engage with consumers and staff
- Promote insurance products and services in a controlled manner
- Reply to your messages and comments
- Understand how people engage with our content so we can improve it
- Meet our legal obligations

Under the General Data Protection Regulation GDPR, this is usually based on our legitimate interests, meaning we use your data in ways you would reasonably expect when interacting with us online.

Legal Bases Relied Upon for Use of Your Personal Data

Legitimate Interests: Article 6(1)(f) GDPR

This is the primary legal basis for brand advertising and public engagement.

Legitimate interests include:

- Promoting insurance products and services in a controlled manner
- Maintaining an online presence and managing reputation risk
- Communicating corporate information and public disclosures
- Engaging with individuals who voluntarily interact with content

- Monitoring engagement to improve communications

A documented Legitimate Interests Assessment (LIA) is maintained, demonstrating that:

- Processing is necessary for business purposes
- Individuals would reasonably expect such processing in a social media context
- The impact on data subjects is minimal and proportionate
- Safeguards are in place to protect individuals' rights

Safeguards include:

- Clear privacy notices and platform disclosures
- Content moderation procedures
- Restrictions on profiling and targeting
- Opt-out and disengagement mechanisms

Consent: Article 6(1)(a) GDPR

Consent is relied upon where required by GDPR or e-privacy rules, including:

- Re-use or sharing of user-generated content for marketing
- Competitions, promotions, or campaigns run via social media

Consent:

- Is obtained in a clear and transparent manner
- Is recorded where appropriate
- Can be withdrawn at any time without adverse impact

General engagement (likes, comments, follows) does not rely on consent, as the individual initiates the interaction.

Who Can See Your Data and How Is It Protected?

Personal data posted on social media platforms will be publicly available and can be visible to both registered and unregistered users depending on the platform.

Where we engage with members of the public, we only process personal data that users have themselves made publicly available. As the personal data processed are those which are already made publicly available, no particular confidentiality measures are required.

Access to the OUTsurance social media accounts is limited to those who need to interact with them for professional, role-related reasons. Our accounts are password protected and content extracted from social media is stored in password-protected servers, with access limited on a need-to-know, or need-to-do, basis. Physical access to our premises is protected and restricted to authorised personnel only.

Your data may also be processed by:

- The social media platforms themselves
- Trusted service providers who help OUTsurance manage communications or analytics or who provide other vital services to the OUTsurance business

OUTsurance will not sell your personal data and we do not use personal data obtained via social media for automated decision-making. Social media is not used to collect policy data, health data, or payment information.

When you view, or interact with, content on social media platforms, please be aware that these platforms are independent data controllers. This means they decide how they collect, use and process your personal data for their own purposes, including analytics, advertising and platform optimisation. We do not control or take responsibility for how these platforms handle your personal data. Your interactions with our pages, posts, videos or content are also subject to the platforms' own privacy policies and terms, which we recommend you review carefully.

How Long We Keep Your Data

Any personal data we process in the context of our interaction with you as a user of social media and our accounts will be kept on the account for as long as the OUTsurance accounts exists, unless you decide to delete your posts or accounts, in which case the usage policies of the platform will apply.

Your Rights

You have rights under the GDPR, including the right to:

- Seek access your personal data
- Ask for it to be corrected or deleted
- Object to or limit how it is used
- Request a copy of your data (in some cases)
- Complain to the Data Protection Commission

You can contact us to exercise your rights in relation to personal data processed by OUTsurance. Please have your relevant social media account details to hand when contacting our Data Protection Officer by email at dpo@outsurance.ie

When you engage with us through social media platforms such as Facebook, Instagram, YouTube, LinkedIn or X, please be aware that these platforms are independent data controllers. They collect and process your personal data for their own purposes, including analytics and advertising. We do not control or retain most of the personal data associated with these interactions, such as likes, comments, shares, profile information, or engagement metrics. Except where you send us a direct message, or provide information that we choose to retain, we do not store or create copies of social media interactions. This means that if you make a data subject request relating to information processed by a social media platform, we may not be able to provide access to that data.

To exercise your rights in respect of data held by a particular platform, you should review the platform's privacy notice and adjust your privacy settings, account preferences, or request deletion directly from the platform.

Questions

If you have any questions or issues regarding how we process your personal data via social media our Data Protection Officer would be happy to address them with you.

Please contact us at: dpo@outsurance.ie