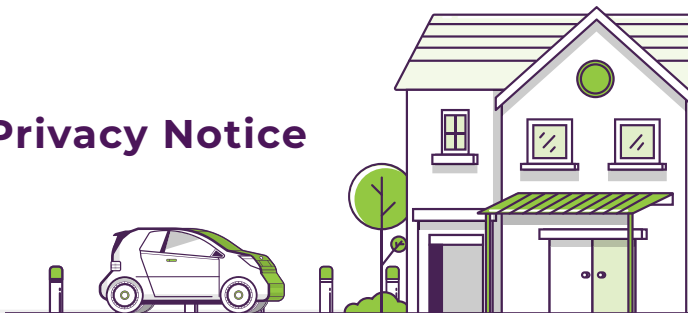




Privacy Notice



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 to 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 how we handle your data, as well as information we may receive from others, such as your named drivers and people living at the insured property. 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.

Please read this Privacy Notice carefully and share it with anyone covered under your insurance policy, including named drivers and anyone living at the insured property, as it also applies to them.

Ensure that anyone else insured under your policy has given you permission to share their personal information with us. Additionally, make sure you have their consent to receive their penalty point information. To add them to your insurance policy, we may need to share this information with you both during the quotation process and throughout the policy term. Please note that OUTsurance is not responsible for the privacy policies, cookies, or personal data sharing, of any third party, including those third party entities to which our website provides a link. These websites may collect and use your personal data, including sharing it with other organisations or companies. Please refer to those websites for the relevant Privacy Notices and Cookie Notices.

We will update this notice from time to time. The latest version will always be available on our website.

We recommend reviewing it regularly to stay informed about how we use and protect your personal data.

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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 and, where applicable, others insured under your policy, as described in this Privacy Notice. This information may be collected directly by OUTsurance staff, through our website, client portal and app, or indirectly through third-party service providers acting on our behalf. The specific types of personal data we collect are outlined below. To provide you with a policy, 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 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 websites, contact centres, e-mail, post and in person. 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.

It is crucial that the information you provide is accurate and complete. You are legally obligated to exercise reasonable care to ensure that the details you provide are correct and comprehensive. Failure to do so may result in OUTsurance cancelling your insurance policy or denying claims, and it could also impact your ability to secure insurance in the future.

Personal data provided by	Details	Categories and Types of Data Collected
Indirect Engagement	<p>We collect your personal data indirectly from third party service providers in certain circumstances. These parties include:</p> <ul style="list-style-type: none">• Other insurance companies;• Any third parties involved in an incident with you;• Public registers (e.g. Companies Registration Office)• Industry Databases• Credit referencing agencies• Official authorities (e.g. An Garda Síochána, the ambulance or fire services).• 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)	<p>We use these databases, websites and sources to obtain additional details; to help verify personal data and other information you have provided to collect analytics data and perform website functions.</p> <p>To collect analytics data and perform functions that provide a good user experience on our website and to re-target, to ad-serve and for cross-site tracking</p>

<p>Direct Engagement with You</p>	<p>We collect your personal data directly from you when you:</p> <ul style="list-style-type: none"> • Contact our customer service centres (e.g. to get an insurance quote) • Submit an online application to receive an insurance quote or to renew your policy • Visit our website or use our app • Submit a claim • Request any information from us; and/ or • Communicate with us via social media platforms or competitions • Appear and be recorded on CCTV within the OUTsurance office • Engage with us via phone, email, post or at meetings as a business partner of OUTsurance 	<p>Name, address (including Eircode), date of birth, contact details, gender, marital status of you and others insured under the policy</p> <p>Policy numbers, vehicle and property details, premium information, and renewal dates (including with other insurers).</p> <p>Voice data of you or your authorised personal representative in call recordings.</p> <p>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.</p> <p>Bank and payment card details, VAT and tax numbers, records of payments and arrears.</p> <p>Employment details, telephone recordings, location data, marketing preferences and CCTV footage from our offices.</p> <p>Health-related data in the context of claims and where it affects your ability to drive (please do not send us genetic test results)</p> <p>Username and password for a website account (which you may set up in order to obtain a quote or purchase insurance or services)</p> <p>Other details requested on application forms such as vehicle registration, make and model</p> <p>Images of customers or potential customers or potential employees or business partners in the event you attend the OUTsurance offices</p>
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Third Party Database	Details	Categories and Types of Data Collected
Insurance Link	<p>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.</p> <p>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.</p>	We use these databases and websites to obtain additional details, to help verify personal data and other information you have provided.
IIDS (Integrated Information Data Service)	This is a shared members database that, by arrangement with the Department of Transport, allows insurance company members to access information from the National Vehicle and Driver File which is a database belonging to the Dept of Transport that collects and stores data on drivers and vehicles	Driving and vehicle-related data: This database allows users including OUTsurance to confirm the accuracy of penalty points and no claims discount information provided by customers with motor policies

Additionally, when you provide your address, OUTsurance will perform a geocoding search to assess location-based risk factors, which helps us determine the insurance quote.

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”).

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, through the OUTsurance website or app, or in other situations where necessary.	This processing is necessary to comply with legal obligations; for the performance of a contract, or in order to take steps at your request prior to entering into a contract (including a quote that is not taken up).
Verify Information Accuracy: To ensure the information we receive is correct including confirming whether a vehicle has been taxed, has an NCT, or if the vehicle has been involved in a claim or written off, using the VRN system; to validate your driver licence number with the relevant authority; to validate the number of penalty points disclosed by you; to validate the licence date and country of origin of the licence	This processing is necessary to perform the insurance contract, or to take steps before entering into the contract (including a quote that is not taken up).
Set you up as a policyholder, or record you as a party entitled to indemnity as well as administer the policy, including with respect to the collection of premiums, processing of claims and other payments made in the course of our contractual relation	This processing is necessary to perform the insurance contract, or to take steps before entering into the contract, or to comply with a legal obligation

Assess Insurance Needs and Risk: To evaluate your insurance requirements, to assess the risks related to your policy and evaluate in line with our underwriting protocols and to determine your eligibility and premium and or to provide a quotation, in order to comply with our legal obligations and enter into a contract with you. This may include credit rating checks and related decisions.	This processing is necessary to perform the insurance contract, or to take steps before entering into the contract and to comply with a legal obligation.
Payments and Payment Frequency: To process payments related to your policy, claims, or other reasons.	This processing is necessary to perform the insurance contract, to comply with legal obligations, or to serve our legitimate interest (such as managing payments not required by law or contract).
Managing Products and Services: To administer the products and services you have with us, which may include contacting you, to set you up as a policyholder or record you as a party entitled to indemnity as well as administer the policy, or to process a cancellation of the policy, or in relation to a claim.	This processing is necessary to perform the insurance contract, or to take steps before entering into the contract or to comply with our legal and regulatory obligations.
Claims processing and management: To manage and investigate any claims made by or against you or anyone insured under your policy, or if you (or someone else covered by your policy) 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.
Identifying customers who may be suitable candidates to provide customer testimonials for OUTsurace.	This processing is based on our legitimate interest
Identifying customers needing additional support.	To comply with our legal and regulatory obligations and in the legitimate interest of OUTsurace

Approaching customers who have been identified as suitable candidates for providing customer testimonials for OUTsurance	This processing is based on our legitimate interest
Customer testimonials and campaign participation: If you choose to participate in the campaign, we will process your personal data, including your testimonial and any related information.	This processing is based on your consent and our legitimate interest
Market Research and New Offerings: To conduct market research, improve existing products or services, or explore new business opportunities and to track click through rates and website visits to manage campaign effectiveness	This processing is based on our legitimate interests, or those of a relevant third party, and in some cases may be necessary to comply with legal and regulatory obligations and in circumstances where you have accepted tracking cookies it is based on your consent.
To personalise your experience when you use our website, or visit third-party websites, by presenting information and advertisements tailored to you. To conducting targeted marketing campaigns, which may include profiling and segmentation, building a profile that we may use to target or tailor our advertising to you and other customers to ensure that it better meets the needs of our customers and to determine what offers about our products and services you are eligible for; to ensure that we are offering appropriate products to our customers; to running contests and giveaways of interest to you and other customers.	This processing is based on our legitimate interest, or those of a relevant third party, or you have provided consent (where we achieve personalisation via acceptance of cookies).
To contact you with feedback surveys	This is in the legitimate interests of OUTsurance to improve our services to customers
To manage customer relationships, responding to queries complaints and feedback received through various channels including social media and managing our organisation's social media presence, interacting with our followers and collecting data through social media platforms and generally fulfilling our marketing plan goals	This processing is in our legitimate interest or those of a relevant third party and in circumstances where you have consented to cookies or tracking technologies it is based on your consent

<p>Marketing Communications: To inform you about other products and services we think may be of interest to you or your family, unless you've opted out. This may include marketing campaigns, cross-selling, promotion of our products and brand, loyalty programs and rewards agencies, information on bonuses for referring family and friends, congratulations on special occasions, newsletters or other sponsorships, information on events, sending information on offers and incentives through the elaboration of commercial profiles. These campaigns can be carried out through emails, calls, SMS, search engines, social networks and involve automated processing for monitoring.</p>	<p>This processing is based on your consent for direct marketing activities, but depending on the specific case we may have a legitimate interest in sending commercial communications that may be of the interest of consumers</p>
<p>Staff Training and Management: For staff and quality training, performance assessments, and disciplinary purposes</p>	<p>This processing is necessary for compliance with regulatory and legal obligations and to perform the insurance contract, as well as for our legitimate business interest</p>
<p>Fraud Prevention, including the prevention and detection of fraudulent applications and 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</p>	<p>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</p>
<p>For video surveillance and access control at our headquarters to ensure the safety of people and property and for the prosecution of crimes, where appropriate</p>	<p>This processing is necessary for our legitimate interest or to comply with legal and regulatory obligations</p>
<p>Complaint Management: To handle, investigate and resolve complaints including complaints to the FSPO</p>	<p>This processing is necessary to perform the insurance contract and comply with legal and regulatory obligations</p>
<p>Data Subject Access Requests: to handle and process any request by data subjects under the GDPR</p>	<p>This processing is necessary to comply with legal obligations.</p>

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

3.1 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 applications and 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 previous 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 Síochána, 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](#)

During the term of your insurance policy, we may check InsuranceLink for data on any previous claims made by or against you or your named drivers (where applicable, we will also check any third-parties claiming against your policy). In the event that we find any claims, we may then contact the relevant insurance company for further details about those claims. 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.

Should a search on InsuranceLink reveal that there are claims that ought to have been reported to OUTsurance, but have not been, OUTsurance may rely on legal rights set out in our insurance policy. These include the right to cancel your contract of insurance and the right to refuse claims. If this happens, you may find it difficult to arrange insurance in the future.

We will also pass details of claims made against you (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.

3.2 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 where it affects your driving, or to protect someone's vital interests if they are unable to give consent.

3.3 Use of penalty point data

In the course of an application for motor insurance, our representatives may ask whether you or any other driver intended to be insured on your policy, have any penalty points and if so, how many. We may obtain this information from you where you seek a new policy of insurance, but also for your current policy or for each renewal of same, particularly if different drivers are to be insured.

Where you engage with OUTsurance to seek a motor insurance quotation, we may then use your details and those of drivers covered under your policy to obtain penalty point information from the Department of Transport, which collects and stores this information on the national vehicle and driver file (NVDF). The information on penalty points may then be used in conjunction with other information to decide whether you and other drivers to be insured under your policy are within the risk appetite of OUTsurance and also what your premium may be.

Where these checks are used by us, acceptance or rejection of your application will not depend only on the results of this process, but the results of the process may impact your premium.

3.4 Automated decision-making

In order to incept and administer an insurance policy, OUTsurance may use profiling and automated decision-making processes. Automated decision-making is the process of making a decision by automated means without any human involvement. These decisions can be based on factual data, as well as on digitally created profiles or inferred data. Examples include:

- **Premium Calculation:** We analyse the information you provide, such as incident or claims history, age, address, and vehicle type, to determine your insurance premium.
- **Credit Assessment:** During the sales and underwriting process, some of your personal data may be shared with third- party contractors to obtain a credit score. This helps us accurately evaluate your risk profile and set your premium.
- **Environmental Risk Assessment:** Address details may be shared with a third party to assess potential environmental risks (e.g., flood risks near your home). This data is used to calculate a risk rating, which is factored into your risk profile to determine your premium.
- **When you make a claim:** to validate and ensure your claim is covered under your policy as well as to determine whether any claim made on your policy is fraudulent.
- **Underwriting Process:** Underwriting involves evaluating, accepting, or rejecting risks and classifying them to assign an appropriate premium. The specific factors analysed depend on the type of insurance product. Applicant data is assessed using internal algorithms. These algorithms, which are OUTsurance's proprietary intellectual property, are confidential, so we cannot disclose further details.

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, such as past motoring convictions for motor insurance, 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.

3.5 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

In the event that our automated underwriting rules determine you are outside of our acceptance criteria, we may not be able to offer you an insurance policy. As is the case with all insurance companies, it is in the commercial interests of OUTsurance to determine the range of customers and risks we underwrite and this is the company's prerogative. We will implement suitable measures to safeguard your rights, freedoms and legitimate interests, including providing you with the right to obtain human intervention and for you to express your point of view and contest the decision (i.e. a human will review the automated decision). If you wish to seek a review of any such decision, please email us on complaints@outsurance.ie

3.6 Impact of not providing information

Failure to provide the required information may prevent us from offering you a quote or result in a higher premium than if we had received accurate details. Certain information is essential for managing your policy and without it we may be unable to provide you with an insurance contract necessary to manage your policy, and we cannot offer you an insurance contract without it.

If you fail to provide the necessary information to support your claim, we may be unable to process it. Additionally, your policy requires you to notify us of any incidents that could result in a claim and fully to cooperate with us in managing the claims process.

3.7 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.

3.8 OUTsurance business partners

If you are a business partner of OUTsurance, we may also collect your personal information from our day-to-day business activities with you, business referrals and your attendance at events. We may, as a result of our business dealings, come to possess personal data in relation to you and your employees, directors, officers, and other representatives. We may receive such data from you, from such persons, or from other sources (for example, published or publicly available directories); and some limited data may be recorded indirectly by internal security and communication systems or by other means (for example, visitor logs maintained by security officials at our offices). We will always comply with our data protection obligations and these data will only be processed or disclosed in accordance with the law and as stated in this notice.

3.9 Job applicants

If you have applied for a job through our Careers portal, or job posting websites such as LinkedIn, Indeed or Irish jobs, your personal data will be collected and stored in our servers. Typically, this is the data which will be collected, stored, and processed (until you ask us to stop the processing or ask us to delete it): Name, address, telephone number(s) and email address, details of qualification (where required for a role), skills, experience, and employment history, details of eligibility to work in Ireland, any additional information contained in a candidate's CV such as referee information, disclosed at interview or otherwise provided to us during the recruitment process, your accessibility requirements, if any. You should also check the Data Privacy Notice of any third-party websites utilised by you.

In cases where you attend an onsite job interview, your images will be captured by our CCTV, which have been installed strictly for security purposes, as well as the CCTV operated by the landlord of the building.

For existing and former employees of OUTsurance, please refer to our employee manual for data processed.

For third party claimants against an OUTsurance insurance policy, please refer to the data privacy notice for claims <https://www.outsurance.ie/globalassets/documents/outsurance-dac/privacynotice.pdf>

3.10 CCTV in OUTsurance building

Closed circuit television (CCTV) has been installed in the building by the building landlord. The system comprises a number of cameras installed at reception and at each lift lobby, recording video images without sound. The purposes of the CCTV are to deter and detect unauthorised access to the property, to enhance safety, to protect building occupants and their property and to provide evidential material for criminal court proceedings.

The information obtained by CCTV is controlled by the landlord in accordance with data protection laws. Signage is in place to inform people that CCTV is in operation. Day to day access to CCTV footage is restricted to its senior managerial personnel on a need to know basis where any incidents require review. Currently, images are kept on a hard drive for no longer than a 30-day cycle unless required to investigate an incident. A log of access to the CCTV records is maintained by the landlord.

An individual whose image has been recorded has a right to be given a copy of the information recorded. Practically, a person must provide necessary information by detailing information such as the date, time, location and duration of the recording. They should also provide a passport sized photograph of themselves unless their identity is already known (e.g. a member of staff). Where the image is of such poor quality as does not clearly identify an individual, that image will not be considered to be personal data. Before releasing this information, the images of others will be obscured or removed.

CCTV has been placed within the OUTsurance office. Images are kept for no longer than 30 days unless required to investigate an incident.

4. Sharing of Information

We may share your personal data with various parties under certain circumstances. Typically, this includes your representatives, our representatives, and 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	<p>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.</p> <p>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.</p> <p>When you seek a quotation or purchase a policy, we may check InsuranceLink for prior claims involving you or third parties. If undisclosed claims are found, OUTsurance may invoke its legal rights, including policy cancellation or claim denial. Details of claims or incidents involving you may also be shared with InsuranceLink.</p>
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 your insurance policy (e.g., initiation, renewal, or claims), we may consult these databases to check for prior claims involving you, named drivers, or third parties. If discrepancies are found, OUTsurance may exercise legal rights outlined in your policy, which could include cancellation of your insurance and denial of claims. This may affect your ability to secure insurance in the future.

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	<ul style="list-style-type: none">Internal/External staff of OUTsurance DAC and the OUTsurance GroupContractorsOther members of the OUTsurance Group in our claims, customer service, quotation, underwriting departments, and support departmentsProspective buyers or sellers if we choose to buy or sell any business or assets
Witnesses	<ul style="list-style-type: none">Witnesses to any incidents/accidents in which you are involved including expert witnesses and witnesses as to fact
Claimants and their Legal or Medical representatives	<ul style="list-style-type: none">Claimants' representativeClaimants' intermediaryClaimants' legal representativesClaimants' doctor or expert
Any Party You Have Given Us Permission to Speak to	<ul style="list-style-type: none">Policyholder's representativePolicyholder's intermediaryPolicyholder's solicitorPolicyholder's public loss assessorPolicyholder's relative or friend

Any Party Named Under Your Insurance Policy	<ul style="list-style-type: none"> • Joint policyholders • Named drivers • Employees
Other Insurers and Their Agents	<ul style="list-style-type: none"> • Other insurers directly or via those acting for the insurer such as loss adjusters
Government, Regulatory and Statutory Bodies	<ul style="list-style-type: none"> • 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
Service Providers	<ul style="list-style-type: none"> • Reinsurance brokers and companies, professional advisers, legal advisors, auditors, roadside assistance providers, courtesy car providers, salvage auction and traders • Motor assessors, loss adjusters, private investigators, expert appraisers, expert witnesses • Providers of our essential services (e.g. telecommunications, postal/courier providers, managed mail and communication solution providers, IT service providers, software providers, email management system providers, payment processor, claims management system providers, data storage, document production and destruction, cybersecurity, fraud and financial crime prevention and detection systems, sanctions checking systems, risk assessments, telematics, complaints management, marketing and market research). • Other third parties involved in administering your contract such as data analysis service providers.

4.1 Sharing Data with a Claimant

In cases where a claim is made against you and OUTsurance provides indemnity, we may share relevant data with the claimant or their representative to facilitate the claims process. This may include details such as your name, address, vehicle registration number, insurance policy details, and information about any insured parties under your policy. This is outlined in the table above. The legal basis for this sharing is OUTsurance's legitimate interest in handling claims efficiently and fairly.

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").

4.2 Consumer Insurance Contracts Act

Under this Act, if a third party suffers injury or damage for which you are responsible, they may assume certain rights under your policy. In such cases, OUTsurance is required to treat the third party as the policyholder and may disclose specific information, including:

- Your identity and insurance details.
- The status and terms of your policy at the time of the incident.
- Details about the incident, claim investigations, and decisions regarding the claim.

This ensures fair and transparent claims handling in accordance with legal obligations.

4.3 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.

4.4 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.

4.5 Cookies

Our Cookie Policy may be found on our website adjacent to this Privacy Notice and we encourage you to read it in full as it provides full details on the cookies used on this website and how you may change your cookie settings should you wish to. We are also very happy to deal with any queries you might have in relation to cookies. Please contact our Data Protection Officer at dpo@outsurance.ie

We use cookies (including those connected with Google) and similar technology such as conversion tracking pixels to understand how our clients and other visitors interact with our website and to show you relevant advertisements. This involves collecting information about your browsing activities, building a profile of your interests and creating advertising audiences based on website interactions.

These technologies utilise personal data of website users. We have a legitimate interest in improving our website's user experience and in improving the relevance of our advertising.

Furthermore, some of the analytics may assist us in delivering the services we are providing to you. As such, we have the requisite legal bases under GDPR. Some sharing of these data takes place with service providers and partners, which is addressed in full in our Cookie Notice. In some instances, the data may be transferred outside the EU/EEA with appropriate safeguards.

You can:

- Withdraw consent for advertising cookies at any time through our cookie banner
- Opt out of the cookies associated with advertising – see our Cookie Notice on how to do this
- Request erasure of some or all of your personal data by contacting us at dpo@outsurance.ie
- Access and update your data preferences in your own personal Google account (if you have one)
- You can manage your cookie preferences through:
 - Our cookie banner (the icon is present onscreen when you visit our website)
 - Your browser settings
 - Google's privacy controls at myaccount.google.com

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
CCTV images within OUTsurance's Head office area	30 days
Data related to quotes not proceeded with or quotes not taken up	36 months (for quotes up to 1 March 2026). 12 months for quotes after 1 March 2026
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
Policy Data	10 years from date on which the policy expires.

Data related to a Data Subject Access Request	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
Resumes, CVs, interview notes, emails and other communications in respect of unsuccessful job applicants and data in respect of former employees	1 year and 1 day in respect of unsuccessful job applicants and 7 years from end of employment for former employees
Data of business partners, including SLAs, contracts, invoices, receipts and communications relating to same	7 years from date of termination of the business relationship

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, such as policy renewals or ongoing claims.

7. Customer Communication

We may contact you periodically regarding various aspects of your interactions with OUTsurance. These communications will align with the purposes outlined in this Data Protection Statement and may include, but are not limited to:

- Managing your insurance policies
- Discussing renewal terms
- Following up on provided quotations
- Addressing claims and complaints
- Seeking a customer testimonial from you
- Marketing services and products (if you have consented)
- Providing loyalty programs and additional services and
- Conducting market research

During the quotation process, we may reach out shortly after issuing a quote to answer any questions, review your premium, and ensure you have the necessary coverage. If we do not contact you, feel free to reach out to us and we will address your queries.

We adhere to specific contact times:

- Calls will not be made before 9 AM or after 9 PM from Monday to Saturday,
- No calls will be made on Sundays, public holidays, or bank holidays unless you specifically request them.

8. Direct Marketing Information

8.1 How it Works

If you have agreed to receive direct marketing communications from us, we may occasionally contact you about OUTsurance products that could interest you. This may include follow-ups on the 12-month anniversary of a quote not taken up, or after your policy has lapsed.

We may use the contact details you provided (postal address, email, or phone, including mobile) to reach out. Additionally, we analyse customer purchasing behavior and data (e.g., time of purchase, preferred channel, coverage level, renewal dates) to tailor our offers and improve our service.

8.2 Changing Your Direct Marketing Preferences

If you no longer wish to receive direct marketing communications, you can update your preferences by:

- Contacting us
- By email at: optout@outsurance.ie
- By phoning us at 1800 600 400

Please allow up to 30 days for your opt-out request to take effect. This decision will not impact the other services we provide to you now or in the future.