Privacy Policy

Blue Insurance Limited and its associated companies (*'we' or 'us' or 'our'*) are committed to protecting your privacy and personal information at all times and ensure that all personal data processed by us is done so in in compliance with the relevant data protection legislation. Blue Insurance Limited's head office is registered at Plaza 255, Blanchardstown Corporate Park 2, Blanchardstown, Dublin 15.

When we talk about Blue Insurance in this notice we are talking about Blue Insurance Limited and any company, brand, business name or domain within the Blue Insurance Group to which this policy will apply. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

As an insurance intermediary we provide insurance on behalf of the Underwriter/Insurer. Therefore, we act as a joint data controller with the provider of the applicable scheme with reference to the personal data which we manage, process or store.

If you have any queries regarding this notice you can contact us at <u>dataprotection@blueinsurance.ie</u>.

Information That We Collect

Personal information may be collected for a number of different reasons such as:

- If you wish to register as a user of a one of the websites within the Blue Insurance Group, this is known as Affiliate registration and is available to people who operate a functioning website.
- If you wish to obtain a quote or purchase a policy with us via our website or over the telephone with our call centre.
- If you enter a competition a competition with us or complete a survey.

These details may include (where applicable) name, address, age, email address, contact number, licence number, IP address (online bookings only), bank account details or credit/debit card details and telephone call recordings.

We may use your personal information to identify you as a customer, for the provision and administration of insurance products and related services. We may also use your information for marketing purposes unless advised otherwise. Should you be unable to provide us with the required personal data, we will be unable to provide you with Insurance. By going ahead with a quotation or policy or by giving us personal information you will be explicitly agreeing to us, the Underwriter/Insurer and other persons described in this notice processing it for all relevant purposes.

If you give us information about someone else, we will use it in the ways described in this Privacy Policy. Before you disclose information to us about another person, you should be sure that you have their agreement to do so. You should also show them this policy. You need to ensure they confirm that they know you are sharing their personal information with us for the purposes described in this Privacy Policy.

How We Use Your Personal Data

We take your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law or due to contractual obligations. We only retain your data for as long as is necessary for the purposes of providing insurance products and related services to you and so as to comply with legal and regulatory requirements. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

We use and share your data as detailed below:

- share information about you with companies within the Blue Insurance Group, other organisations outside the Blue Insurance Group such as public bodies including an Garda Síochána and other law enforcement agencies,
- you have agreed or explicitly consented to the using of your data for the purpose of providing you with promotional offers and marketing (you are free to withdraw this consent at any time),

- use as necessary in relation to providing you with an insurance quotation or the purchase of an insurance product,
- sharing details with or seeking personal information from your comparison company (if applicable) and anyone authorised by you to act on your behalf,
- sharing details with or seeking personal information from the Underwriters, claims company, repairers and other claims handling agents, medical practitioners, engineers and legal practitioners,
- market research, customer satisfaction surveys, and data analytics, including profiling, to develop and enhance the customer relationship and journey as part of our business strategy,
- we may record or monitor calls for quality and reference purposes.

Contacting you / Opt - Out

Once you have consented to us contacting you we may contact you from time to time with discounted offers and information on insurance products from the Blue Insurance Group, along with information we think may be of interest to you. We may also contact you about an enquiry you have made or a quotation you have received, to conduct a customer survey on the products and services we provide or to conduct market research, to tell you about any important changes to your insurance policy or where there is another genuine reason for doing so.

Contact may be by means of email, SMS or telephone.

If you change your mind about receiving direct marketing from us you can Opt-out at any stage by emailing <u>optout@blueinsurance.ie.</u> You also have the option to unsubscribe directly from the electronic correspondence you receive from us.

Links to Third Party Websites

If we provide a link on any of our websites to a third party website, the content, accuracy and function of such websites are outside of our control and we cannot accept responsibility for same. Any dealings you have with such third party websites shall be on the terms and conditions of that website operator. If you have a concern regarding the way your personal information will be used on other sites, then you are advised to contact the company concerned to request a copy of their privacy policy if not available to you via their website.

Your Rights

You have the right to request a copy of your personal data and to have any incorrect personal data we hold on you corrected. You also have the right to withdraw your consent for the processing of your personal data, have your personal data erased, or the processing of your data restricted. Please note that withdrawing consent and requests for restriction/erasure may affect our ability to provide you with insurance. Some of the above rights are subject to limitations in order for us to comply with our regulatory obligations. You have the right to data portability for insurance purposes. You also have the right to lodge a complaint with the Data Protection Commissioner.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice, where there is a legal requirement or where we are obliged to by contractual agreement. We may use third party companies to assist in the provision of the services we provide or the general running of our business, companies such as (but not limited to) Realex Payment system to provide a secure payment facility, DNA IT to assist in the general running and security of our systems or Close Brothers Premium Finance to provide a finance option on our Car, Home and Pet Insurance products. The third party companies we use are not limited to those listed above; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

Up to date Information

In order for us to keep your information accurate and up to date, please contact us if any of your details change.

Safeguarding Measures

We take your privacy seriously and take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including but not limited to digital certificates, data encryption, firewalls and anti-virus/malware.

Cookie Notice

A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <u>https://www.aboutcookies.org</u>.

Transfers Outside the EU

Personal Information may be accessed/hosted/stored in countries outside of the European Union by some of service providers we use. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and comply with the relevant data protection laws. Certain Underwriters/Insurers that we act as joint data controller with may also access/host/store data outside of the European Union.

How Long We Keep Your Data

We only retain your data for as long as is necessary for the purposes of providing insurance products and related services to you and so as to comply with legal and regulatory requirements. Generally, we will keep information for the following periods:

<u>Type of Information</u> Quote Information (where a policy has not been purchased) Policy Information Retention Period 12 months 8 years

However, in certain cases we may need to keep personal data longer than the above periods such as long running disputes. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Queries and Complaints

If you are unhappy with the way we have handled your personal information or If you have any queries regarding this notice you can contact us at <u>dataprotection@blueinsurance.ie</u>.

Alternatively, you have the right to lodge a complaint with the Data Protection Commissioner. Their contact details are as follows:

Data Protection Commissioner, Canal House, Station Road, Portarlington, R32 AP23, Co. Laois Telephone: +353 57 868 4800 / +353 (0) 761 104 800 or Lo Call: 1890 252 231 Email: <u>info@dataprotection.ie</u>