PROTECTION | PENSIONS | INVESTMENTS

Summary Data Protection Notice



Your privacy is important to us

At New Ireland Assurance, we take your privacy seriously. It's important that you know exactly what we do with personal information that you and others provide to us, why we gather it and what it means to you. This notice explains the most important aspects of how we use your information and what rights you have under the General Data Protection Regulation (GDPR). Our full Data Privacy Notice sets out in more detail how we use personal information. You can view this on our website newireland.ie.

At New Ireland we are committed to:

- Protecting you and your information
- Giving you control
- Being transparent
- Creating value for you

We recommend that you take time to read this summary notice carefully. If you have any questions about how we use your information, please contact us or our **Data Protection Officer**.

1. Who we are

Your information is gathered, stored, shared and used by New Ireland Assurance Company plc (New Ireland Assurance). New Ireland Assurance is a member of the Bank of Ireland Group.

2. The information we collect about you

We gather data to identify you, including your contact information, your financial details/financial circumstances, your occupation/employment, your marital status, your health and/or your financial associations, information about you provided by others, information which you have consented to us using and other personal information, such as, telephone recordings, CCTV images from our offices and information in relation to data access, correction, restriction, deletion, porting requests and complaints.

Sometimes we may use your information even though you are not our customer. For example, you may be a beneficiary, a life assured where the policy owner is our customer, a representative of our customer or applying for one of our products or services.

3. When we collect your information

We collect information you give us, information from your use of our products and services or our website and mobile apps and information provided by third parties.

4. How we use your information and the legal basis

We will use and share your data where:

- its use is necessary and proportionate to provide our insurance or life assurance products and services to you, or in respect of you, and in performance of the contract, including pay a claim
- its use is necessary for us to comply with a legal or regulatory obligation
- you have agreed or explicitly consented to the use of your data in a specific way (you may withdraw this consent at any time)
- its use is necessary to protect your "vital interests" in exceptional circumstances
- its use is in accordance with our legitimate interests eg to manage our business, subject to us not over-riding your interests or fundamental rights and freedoms

5. How we use automated processing or "analytics"

We analyse your information using automated means to:

- help us understand your needs and develop our relationship with you
- help us to offer you products and services we believe will be of interest to you (where you have consented)
- make assessments where you apply for an insurance product. We can make decisions based solely on an automated analysis of your information. The types and sources of the information we use about you are listed above.

We also use automated processing to comply with our legal obligations in connection with the prevention of money laundering, fraud and terrorist financing.

6. Who we share your information with

When providing our services to you, we can share your information with:

- your authorised representatives e.g. persons making an enquiry with your approval or a complaint
- third parties (with whom we need to share your information to facilitate payments you have requested, or those you ask us to share your information with)
- Bank of Ireland Group companies to enable us better manage our business
- service providers who provide us with support services
- statutory and regulatory bodies police forces and security organisations, ombudsmen and regulatory authorities
- third parties in connection with a sale or purchase of assets by a member of the Bank of Ireland Group, debt collection agencies, budgeting and advice agencies, tracing agencies, receivers, liquidators, examiners, Official Assignee for Bankruptcy and equivalent persons in other jurisdictions
- National Treasury Management Agency (NTMA) and its agents
- business partners, auditors and joint ventures
- trade associations and professional bodies, non-statutory bodies
- employers
- pension fund administrators, trustees of collective investment undertakings, pension trustees, re-insurers, and insurance intermediaries
- healthcare professionals and medical consultants
- Policy owners (where you are the life assured), to facilitate the performance of the contract
- Lives assured (where you are the policy owner) to facilitate the performance of the contract

7. How long we hold your information

As a general rule, we keep your information for a specified period of time from the date of when your contract ceases and/or you cease to be a customer. Typically this period is 7 years, however it may be held for a longer or shorter period depending on a number of factors, including

- the type of data
- the purpose for which it was collected
- regulatory rules
- the type of product we have provided

8. Implications of not providing information

If you do not provide the required personal information we will not be able to:

- assess suitability and where relevant provide you with a recommendation for a financial product or service
- provide the requested products or services to or for or in respect of you
- continue to provide and/or renew existing products or services

We will tell you when we ask for information which is not a contractual requirement or is not needed to comply with our legal obligations.

9. Where your information is stored

Your information is stored on systems within New Ireland's and the Bank of Ireland Group's premises and with providers of information storage. In some cases, we transfer information about you and your products and services with us to our service providers and other organisations outside the European Economic Area (EEA). We always take steps to ensure that any transfer of information outside of the EEA is carefully managed to protect your privacy rights. Further details are available in our Data Privacy Notice, which you can access online, in our office or by telephone.

10. How to exercise your information rights and the right to object

You have several rights in relation to how we use your information, including the right, without undue delay, to:

- find out if we use your information, access your information and receive copies
- have inaccurate/incomplete information corrected and updated
- object to particular uses of your personal data for our legitimate business interests
- in certain circumstances, to have your data deleted or our use of your data restricted
- in certain circumstances, a right not to be subject to solely automated decisions and where we make such automated decisions, a right to have a person review the decision
- exercise the right to data portability (i.e. to transfer to another provider)
- withdraw consent at any time where processing is based on consent.

If you wish to exercise any of your data rights, contact us at the details set out below. If you make your request electronically, we will try to provide you with the relevant information electronically.

You also have the right to complain to the Data Protection Commission or another supervisory authority. You can find details of how to contact the Data Protection Commission below and on their website dataprotection.ie:

Postal AddressData Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28Fax+ 353 57 868 4757E-mailinfo@dataprotection.ie

11. How to contact us and/or our Data Protection Officer

If you have questions about how we use your information or wish to exercise your information rights, please contact us at;

New Ireland Assurance 5 / 9 Frederick Street South Dublin 2

Telephone: 01 523 9810*

You can contact our Data Protection Officer online at dataprotection@newireland.ie or by post at the above address.

12. Updates

We will update our Summary Data Privacy Notice from time to time. Any changes will made available on our website and, where appropriate, notified to you by SMS, e-mail, digital media or when you log onto our online customer portal or one of our mobile apps.

*Calls may be recorded for service, verification, analysis and training purposes.



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