

MCL INSURANCE SERVICES LTD.

DATA PROTECTION AND PRIVACY POLICY

LAST UPDATED: 05/02/2018

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❖ SECTION 1.0 - COMPANY INFORMATION

A. OUR IDENTITY

INSUREBRANDS is a trading name of **MCL Insurance Services Ltd.** **MCL Insurance Services Ltd.** is an 100% wholly owned subsidiary registered in Northern Ireland [www.mclinsurance.co.uk]. **MCL Insurance Services Ltd.** its appointed representatives and trading names are authorised and regulated by the Financial Conduct Authority of the United Kingdom and is regulated by the Central Bank of Ireland for the conduct of business rules.

MCL Insurance Services Ltd.	
Companies House No.	NI041174
FCA No.	306483
Registered Office	66 Railway Road, Coleraine, Co. L/Derry, Northern Ireland, BT52 1PG
Services Provided	<ul style="list-style-type: none">* Insurer Agency Management* Supply of Insurance Products* Training & Compliance* Regulatory Support* Statistical & Risk Analysis* Fraud Detection* Credit Checking* Making & Receiving Payments* Management of Direct Debit Payments* Auditing

For further details, please visit the Financial Services Register: <https://register.fca.org.uk/>

B. OUR APPOINTED REPRESENTATIVES

MCL Insurance Services Ltd. operates with a group of appointed representatives and trades under the following companies:

InsureBrands Ltd.	
Companies House No.	NI628281
FCA No.	483942
Registered Office:	66 Railway Road, Coleraine, Co. L/Derry, Northern Ireland, BT52 1PG
Services Provided:	<ul style="list-style-type: none">* Insurance Products* IT Systems* Call Handling* Policy Administration* Compliance* Marketing

Fusion Outsource Solutions Ltd.	
Companies House No.	NI628134
FCA No.	704333
Registered Office:	66 Railway Road, Coleraine, Co. L/Derry, Northern Ireland, BT52 1PG
Services Provided:	<ul style="list-style-type: none">* Call Handling* Online Chat Service* Policy Administration* Complaints Handling

McClartys Limited T/A McClartys Insurance [Northern Ireland]	
Companies House No.	NI628547
FCA No.	697378
Registered Office:	66 Railway Road, Coleraine, Co. L/Derry, Northern Ireland, BT52 1PG
Services Provided:	<ul style="list-style-type: none">* Personal Lines* Commercial Lines* Advised Sales* Call Handling* Policy Administration* Complaints Handling

C. OUR TRADING NAMES

The trading names associated with **MCL Insurances Ltd.** are as follows: -

Brand	Country	Website	Tel No.
25plus	Republic of Ireland	www.25plus.ie	1890 927 334
Its4women	Republic of Ireland	www.its4women.ie	1890 886 227
	Northern Ireland	www.its4women.co.uk	0844 858 0718
Seguromo	Republic of Ireland	www.seguromo.ie	1890 800 001
	Northern Ireland	www.seguromo.co.uk	0844 858 0714
Boxymo	Republic of Ireland	www.boxymo.ie	1890 800 000
	Northern Ireland	www.boxymo.co.uk	0844 326 7562

❖ SECTION 2.0 - GENERAL INFORMATION

MCL Insurance Services Ltd. is committed to protecting your privacy. Please read our 'Data Protection & Privacy Policy' below so that you understand how **MCL insurance Services Ltd.** may process and protect the personal information that we may obtain about you, [*which is known as "Customer Data"*], the circumstances in which we may disclose your data, the choices you have regarding your personal information and your ability to correct any inaccurate data we hold.

It is important that anyone insured under your policy and/or living at the insured property have provided you with consent to process their personal information and they are aware of how their information may be used as outlined in this Data Protection & Privacy Policy. By agreeing to our policy, you agree that you have obtained consent from all individuals covered by your insurance policy.

A. CHANGES TO OUR DATA PROTECTION & PRIVACY POLICY

MCL Insurance Services Ltd. reserves the right to change this Data Protection & Privacy Policy from time to time at its sole discretion. If we decide to make any changes, we will post those changes to our various websites. We would encourage you to periodically review this policy to keep informed about what information we gather, how we might use that information and in what circumstances we will disclose it to others.

By continuing to use our websites after we post any changes, you accept and agree to this Data Protection & Privacy Policy, as modified.

B. LEGISLATION

All personal data that we gather will be processed in accordance with all applicable data protection laws and principles, specifically the EU General Data Protection Regulation [GDPR] and the Data Protection Acts [DPA] for the Republic of Ireland and Northern Ireland.

C. QUERIES AND COMPLAINTS

If you have any comments, queries or suggestions about our Data Protection & Privacy Policy or you wish to exercise any of your rights outlined in this policy, please contact our head office by any of the following options outlined below: -

Data Protection Officer

MCL Insurance Services Ltd.
66 Railway Road
Coleraine
Co. L/Derry
BT52 1PG

Tel: +44 28 70325150 [*option 3*]

Email: compliance@mclinsurance.co.uk

Fax: +44 28 70325105

Data Protection Officer

MCL Insurance Services Ltd.
Compliance Department
PO Box 151
Letterkenny
Co. Donegal

Tel: +44 28 70325150 [*option 3*]

Email: compliance@mclinsurance.co.uk

Fax: +44 28 70325105

You have the right to lodge a complaint with your local Data Protection Authority. The contact details for the Data Protection Commissioner and the Information Commissioner's Officer are as follows: -

The Data Protection Commissioner [ROI]

Canal House
Station Road
Portarlinton
County Laois
Telephone: +353 (0)761 104 8000
Telephone: +353 (0)57 868 4800
Email: info@dataprotection.ie
Lo Call Number: 1890 252 231
Fax: +353 57 868 4757

The Information Commissioner's Office [NI]

3rd Floor
14 Cormac Place
Belfast
Co. Antrim
BT7 2JB
Telephone: +44 28 9027 8757
Telephone: +44 303 123 1114
Email: ni@ico.org.uk

Please note that we will take all appropriate steps to keep your personal data safe. In the unlikely event that we have a security breach, we will notify you without undue delay about the circumstances of the incident in accordance with our legal obligations.

When dealing with complaints or queries from you, we will only respond via the contact details provided by you on your policy and/or quotation. This includes any emails received from an email address not linked to your account. We want to ensure that any issues discussed remain private and confidential and therefore we can only accept complaints or requests from you, the policy holder.

D. DISCUSSING YOUR PERSONAL DATA

To comply with the Data Protection Act and to ensure your personal information is kept safe and secure, we may request information from you to verify your identity before discussing your personal details. We will be unable to discuss your policy or personal details with anyone else unless you give explicit verbal or written consent for us to do so.

If you would like to give consent for someone else to discuss your policy or personal details, please contact our Customer Services Team by telephone or write to our Processing Department at the address[s] outlined in **Section 2C 'Queries and Complaints'** including a hand signed request along with the individual's full name and date of birth.

❖ SECTION 3.0 - COLLECTION OF CUSTOMER DATA

The personal data we require about you and, if applicable, anyone else insured under your policy will be gathered and stored as set out in this Data Protection & Privacy Policy. This will be done either by **Fusion Outsource Solutions Ltd.** employees and/or our appointed representatives or via our various websites. The categories of personal data that we gather are listed under **Section 6 'Data Collected'**.

A. HOW WE COLLECT PERSONAL DATA

When gathering personal data, which is required to provide you with a policy, we may need to: -

- Obtain personal information directly from you, other insurance companies or anyone else insured under your policy;
- Obtain personal information from third parties involved in an incident with you and/or anyone insured under your policy of insurance. This may include other drivers, passengers of your or any other vehicle, pedestrians, witnesses [*whether independent or otherwise*], neighbours, other insurance companies, solicitors representing any third party [*whether in civil or, where applicable, criminal proceedings*], any other expert appointed by a third party, any person at any relevant trial, inquest or any other hearing, or any other relevant person involved in the claims process;
- Carry out credit searches internally or with one or more credit checking or credit reference agencies;
- Carry out searches, whether online [*via websites with publicly available information and various industry websites*], through various media outlets [*including, without limitation, newspapers, television and radio*] or otherwise [*including, without limitation, State and/or industry registers*]; and/or
- Obtain personal data from the emergency services, such as the police, ambulance and fire services, and any other relevant investigatory body or authority [*mainly in claims related circumstances*].

We may request details about you or anybody else insured under your policy of insurance [*including named drivers or people who live at the insured property*] regarding your or their health, any medical conditions which may affect yours or their ability to drive and/or the commission of, alleged commission of or conviction for any relevant offence by you or anybody else insured under your policy of insurance.

B. THIRD PARTY DATABASES

At various times during the quotation or claims process, **MCL Insurance Services Ltd.** will conduct a search of third party databases including, without limitation the following: -

- The Motor Insurance Anti-Fraud and Theft Register [*MIAFTR*]
- The National Vehicle File
- The Insurance-Link Database and;
- The Department of Transport – Vehicle Hub
- The Claims and Underwriting Exchange Register [*CUE*]
- GB Global Link
- Experian Credit Report

These searches will return information relating to: -

- You and your vehicle, including [*without limitation*];
- Previous claims

- Vehicle write off history
- NCT/MOT
- Vehicle modifications and;
- Vehicle taxation and import status

By supplying an Eircode, postcode and/or an address of a property when you are taking out an insurance policy, we will carry out a search of a third-party database to determine location-based risk factors called "Geocoding". This search will return information relating to the topographical nature of the area in which your property is located as part of the normal insurance quotation process. This information is used to support us in rating your risk level when providing you with a quotation.

C. LEGAL OBLIGATION

It is important that the information you give us is correct. You have a legal obligation to take reasonable care not to provide us with inaccurate, incorrect or incomplete information. If this happens **MCL Insurance Services Ltd.** have certain legal rights which may include avoidance of the contract of insurance and refusal of all claims. As a result, you may also find it difficult to arrange this type of insurance in the future.

❖ SECTION 4.0 - USE OF INFORMATION

MCL Insurance Services Ltd. uses your customer data for the provision and administration of insurance products and related services. Examples of the actual or possible uses of your customer data are as follows: -

	DATA TYPE	LEGAL BASIS
A	To verify your [<i>or your authorised representative's</i>] identity in any interactions between MCL Insurance Services Ltd. and you [<i>or your authorised representative</i>], whether in person, on the telephone, online, in an app or where necessary in any other circumstances.	<ul style="list-style-type: none"> ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject.
B	To verify the accuracy of the information we receive.	<ul style="list-style-type: none"> ▪ The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract [<i>including a quote that is not taken up</i>].
C	To assess your insurance needs and to assess the nature and level of the risk associated with your proposed insurance policy to determine your eligibility and [<i>if you are eligible</i>] your premium. This may include carrying out credit rating searches and making decisions about you in that regard.	<ul style="list-style-type: none"> ▪ The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract. ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject.
D	To make or receive any payments, whether in relation to your policy, a claim or any other reason and to make decisions regarding deferred payment arrangements, including without limitation whether to continue or to extend an existing deferred payment arrangement.	<ul style="list-style-type: none"> ▪ The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract; ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject; ▪ The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. MCL Insurance Service's legitimate interest is to use your personal data to make certain types of payment that are not required by law or a contract.
E	To manage and administer any products and services you have obtained from us, including by contacting you [<i>see Section 11 'Communication with Customers' below</i>].	<ul style="list-style-type: none"> ▪ The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract; ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject.
F	To manage and investigate any claim made by or against you or anybody insured under your policy of insurance, or where you [<i>or anybody else insured under your policy of insurance</i>] are or may be a witness to an incident which results in a claim.	<ul style="list-style-type: none"> ▪ The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract; ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject.
G	To provide customer loyalty programmes and value-added services	<ul style="list-style-type: none"> ▪ The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. MCL Insurance Service's legitimate interest is to add value to the MCL product offering.

H	For statistical analysis, either by us or our appointed representatives, and the review and improvement of MCL's products, services, processes, systems, websites and apps. Where possible we will anonymise the data, we analyse.	<ul style="list-style-type: none"> ▪ The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. MCL Insurance Service's legitimate interest is to engage in activities to improve and adapt the range of products and services we offer and to help our business grow and to ensure that our systems are effective and efficient.
I	To carry out market research, to improve our processes, products or services or to investigate the possibility of new processes, products or services and to buy or sell any business or assets.	<ul style="list-style-type: none"> ▪ The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. MCL Insurance Service's legitimate interest is to engage in activities to improve and adapt the range of products and services we offer and to help our business grow and to ensure that our systems are effective and efficient.
J	To inform you of other products and services that may be of interest to you or members of your family, unless you have advised us otherwise.	<ul style="list-style-type: none"> ▪ The data subject has given consent to the processing of his or her personal data for one or more specific purposes. The sending of marketing material to you is only done in circumstances where you have provided us with your consent in advance. ▪ The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. MCL Insurance Service's legitimate interest is to determine the most appropriate message and how best to communicate it with you.
K	For staff training, performance reviews and discipline.	<ul style="list-style-type: none"> ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject; ▪ The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract.
L	For the detection and prevention of fraud, money laundering and other offences and to assist the police, Gardai or any other authorised investigatory body or authority with any inquiries or investigations. Where permitted by law we also work with and share data with various bodies including other insurers, anti-fraud bodies [<i>for example fraud whistleblowing services</i>] and law enforcement agencies to help prevent fraudulent behaviour. In some cases, we are required by law to report details of certain criminal activities and suspected criminal activities to the appropriate authorities.	<ul style="list-style-type: none"> ▪ The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. MCL Insurance Service's legitimate interest is to investigate and prevent potential fraudulent and other illegal activity; ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject; ▪ The processing is necessary for the performance of a task carried out in the public interest.
M	To manage and investigate any complaints;	<ul style="list-style-type: none"> ▪ The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract; ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject.
O	MCL Group reporting purposes [<i>where necessary</i>];	<ul style="list-style-type: none"> ▪ The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. MCL Insurance Service's legitimate interest is the proper running of its business.
P	To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.	<ul style="list-style-type: none"> ▪ The processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract; ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject.
Q	For compliance with all relevant laws and regulations.	<ul style="list-style-type: none"> ▪ The processing is necessary for compliance with a legal obligation to which the controller is subject.
R	As otherwise set out in this Data Protection Policy or any other data protection notice, policy booklet, website, app terms and conditions or other documentation provided to you by MCL Insurance Services or our appointed representative.	

Your customer data may also be used by **MCL Insurance Services Ltd.** to provide you with information about products and services from us or other products and services which are arranged for you by us with other companies within **MCL Insurance Services Ltd.** or with a third party. Please see **Section 12 'Marketing Information'** for further details.

A. SENSITIVE DATA

Where we process personal data relating to criminal convictions and offences or related security measures for any of the above purposes, we will only do so where it is necessary for the assessment of risk or for the prevention of fraud or for the establishment, defence or enforcement of civil law claims.

Where we process other special categories of data [*also known as sensitive personal data*] for any of the above purposes, we will only do so by way of explicit consent, where it is necessary for the establishment, exercise or defence of legal claims or where the processing is necessary to protect the vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.

B. NOT PROVIDING INFORMATION

If you do not provide the information that is required to provide you with a quotation, the result will be either that we will not be able to offer you a quotation or your premium will be higher than if you had provided the required information. There are some categories of information which are required for us to administer your policy and we would not be able to offer you a contract in their absence.

If you do not provide the information that is required to handle your claim, we may not be able to deal with the claim. The terms of your policy require you to notify us of any circumstances that may give rise to a claim against your policy and assist us in dealing with any claim that does arise.

C. CALL RECORDING

We may record or monitor telephone calls for the following reasons [*without limitations*]: -

- To ensure accuracy in the recording of instructions communicated to us;
- To facilitate staff training;
- For the prevention of fraud;
- For the management of complaints and;
- To improve customer satisfaction

❖ SECTION 5.0 - SHARING OF INFORMATION

There are various circumstances where we may share personal data with other parties. Generally, this includes your representatives, our representatives and, if a claim is made, various claims related parties.

A. WHO WE SHARE INFORMATION WITH

The exact list of third parties' can change from time to time, so it is important that you have an idea of the types of third parties that we share data with. Set out below are a non-exhaustive list of third parties we may share your data with and are only indicative of the companies, agencies and individuals with whom we share data where we need to do so.

- **Your Representatives:** Any party you have given us permission to speak to such as a named driver, relative or lawyer;
- **Our Appointed Representatives:** As outlined in **Section 1B 'Our Appointed Representatives'**.
- **Our External Representatives [*including but not limited to*]:**
 - * Underwriters of our insurance products, insurers and underwriting agencies.
 - * Open GI who provide our brokerage IT services
 - * Dotsys Ltd. who provide and manage our IT systems.
 - * Bconnected Media Ltd. who manage our marketing services.
 - * Its4women Promotions who provide our loyalty scheme.
 - * Axon Telematics Ltd. for the provision of our telematics services.
 - * MIS Claims Ltd. who provide our 24-hour breakdown service and legal expenses cover
 - * Contac Claims Service who handle our first notification of claims service
 - * Close Brothers Premium Finance who provide and manage our direct debit facility
 - * Pay and Shop Limited, trading as Realex Payments, who provide our credit and debit card terminal
 - * Elavon Merchant Services our credit card provider
 - * Verisk Analytics who provide risk data via InsuranceLink and the Department of Transport Vehicle Hub
 - * An Post & Royal Mail Group Ltd. manage the delivery of postal documents
- **Claims Process:** Our service providers and expert witnesses including but not limited to those relating to the assessment of liability; the assessment, repair and replacement of vehicles; the assessment and repair of property [*including buildings, land and personal effects*]; medical and functional assessment of individuals; solicitors and barristers; private investigators; and translators; the agents, service providers and claims experts of people making claims against the

policies of our customers including but not limited to those relating to the assessment of liability; the assessment, repair and replacement of vehicles; the assessment and repair of property [including buildings, land and personal effects]; medical and functional assessment of individuals; and solicitors and barristers; witnesses to any incident[s] [whether or not resulting in a claim];

- **Other Third Parties:** Reinsurers, other insurance companies, external advisors [such as solicitors and accountants] and auditors, other sister companies associated with **MCL Insurance Services Ltd** [including but not limited to *Its4women, 25plus, Boxymo and Seguromo*], third parties with which we may choose to improve our processes, products or services or to investigate the possibility of new processes, products or services and prospective sellers or buyers in the event that we decide to sell or buy any business or assets; and State or government departments, bodies or agencies.

Where we choose to have certain services provided by carefully selected third parties, we take precautions regarding the practices employed by the service provider to ensure your personal data is stored and processed legally and securely.

MCL Insurance Services Ltd, as a "Data Controller", will use every effort to protect your personal data and we will not sell your personal information to any third-party companies. We will share your information between our departments and InsureBrands – Its4women, 25plus, Seguromo and Boxymo.

If you would like more details about the parties with whom we share your information, please contact the **Data Protection Officer** in writing, at the address outlined in **Section 2C 'Queries and Complaints'**.

B. SHARING BETWEEN DEPARTMENTS

During any of the activities set out above, a department of **MCL Insurance Services Ltd.** may become aware of information which should have been disclosed at inception of your policy/policies or at a previous renewal which relates to you and/or anybody else insured under your policy of insurance. Where this occurs, the department in question shall be entitled to share such information with:

1	The Sales and/or Underwriting Departments for providing your next quotation and/or deciding whether to cancel your policy/policies [<i>this may include our InsureBrands, Its4women, 25plus, Seguromo and Boxymo</i>];
2	The Claims Department [<i>and any other relevant department</i>] for the purposes of deciding how to deal with a claim];
3	Any other department in MCL Insurance Services Ltd. for the purpose of handling a complaint

C. INTERNATIONAL TRANSFERS

On occasion we or a service provider may transmit certain aspects of your personal data outside the European Economic Area. In such circumstances, we will ensure that such transmissions are carried out securely and in accordance with data protection law.

MCL Insurance Services Ltd. will comply with its legal requirements regarding international transfers of data including, where required, entering into standard data protection clauses adopted by the European Commission, Binding Corporate Rules or similarly approved arrangements.

If you would like more information about the relevant safeguards involved in the transfer of personal data to countries or companies outside the European Economic Area, please contact the **Data Protection Officer** in writing, at the address outlined in **Section 2C 'Queries and Complaints'**.

❖ SECTION 6.0 - DATA COLLECTED

As an insurance broker we need to collect many categories of personal data about you and other parties for the purposes set out in this Data Protection & Privacy Policy. The exact categories may change from time to time. However, we feel that it is important that you know what types of information that we gather and use.

Please note: We have obtained most of the data directly from you. Data may be gathered in relation to both you and other people who are insured under your policy such as named drivers or others who live with you at the insured property.

Category	Types of Data Collected
Policy Information	Name, address [<i>including eircode/postcode</i>], date of birth, contact details, employment details, gender, years of residency in Ireland or the UK, licence details, vehicle and/or property details, telephone recordings, location information [<i>telematics policies only</i>], renewal date, marketing preferences, bank and payment card details, records of payments and arrears, PPS/tax numbers, driving history, claims history and details of any relevant claims, details of any criminal convictions, disqualifications and penalty point information, etc.
Information Obtained from Other Sources	Penalty points, precise address look up, geocoding information, claims history, vehicle details & history, credit score, website usage information, IP address, etc.
Claims Information	The circumstances of an incident, health information [<i>any injuries resulting from incidents, any relevant pre-existing health conditions and any subsequent injuries</i>], criminal conviction information [<i>where it results from or exists prior to an incident</i>], CCTV footage, details of damaged property, estimates, costs, payments, recoveries, PPS number, details of services provided to you [<i>car hire, vehicle repair, home repair, etc.</i>], etc.

If you would like more information about the information we gather and use please contact the **Data Protection Officer** in writing, at the address outlined in **Section 2C 'Queries and Complaints'**.

The above information is required for the purposes specified in **Section 4 'Use of Information'**.

❖ SECTION 7.0 - RETENTION OF CUSTOMER DATA

We have a comprehensive record retention schedule. The retention periods differ depending on the purpose of the processing and the nature of the information. How long we keep data is primarily determined by how long we need it for the purposes we told you we were going to use it for, time periods set out in law and the period we need to keep it to defend ourselves against legal action. Generally, we keep information for the periods set out in the table below: -

Type of Information	Retention Period
Quote Information [<i>where a policy is not taken out</i>]	15 months
Policy Information	The life of the policy plus 6 years
Claims Information	The life of the policy plus 6 years

However, in some cases we may need to keep personal data longer than the above periods. Examples of these situations include long-running disputes and system back-ups required for disaster recovery.

After the retention period ends, we will "De-personalise" or delete the personal data. De-personalisation means that we will delete certain aspects of the information we hold such as name and street address so that we can no longer determine who it relates to. This results in the data no longer being considered personal data. For marketing purposes, we may retain information such as name, contact number, renewal/quote date.

For data security, we operate a "paperless office" and encourage you to use your online portal to upload documents. The facility to send paper documents to our office is still available, however, once received in our office they will be processed, scanned and stored on our secure system and the original copy will be destroyed by the close of business. If, after your document has been processed, you require a copy, we will only be able to provide you with the scanned copy. This does not apply to direct debit mandate forms, they are forwarded to the finance company for the purpose of authorising your loan.

❖ SECTION 8.0 - AUTOMATED DECISION-MAKING

Insurers use automated decision-making, including profiling, in the following situations:

- The information that is provided by you, including your claims history and other factors such as your age, your address and the type of vehicle you drive to determine your premium.
- During the sales and underwriting process, an insurer may send some of your personal data to third party contractors to obtain a credit score for you. This is done to properly estimate your risk profile and therefore your premium.

An Insurer may also send your address details to a third-party contractor to determine information about the area in which you live to determine any environmental risks such as a flood risk near your home. This information will be used to determine a risk rating and will be applied to your risk profile to determine your premium.

Underwriting is the process by which an insurance company examines, accepts or rejects risks and classifies those selected, to charge an appropriate premium for each. The underwriting factors that must be evaluated to complete the underwriting

process depend on the insurance product the customer is interested in; each product requires different categories of information to assess the risk profile of the applicant.

An insurer will analyse an applicant's data to assess the risk they wish to cover and charge a fair insurance premium based on that analysis. They use algorithms or internal models, which use complex mathematical and actuarial methods of calculating and pooling risk, for insurance underwriting purposes. The algorithm and internal models are an insurance company's confidential intellectual property and business know-how. As a result, they cannot provide any further details of how they work.

Where automated decision making is used, which produces legal effects for you or otherwise significantly affects you, you have the right to obtain human intervention and to contest and make representations in relation to the decision in question. For more information, please see **Section 9 'Your Rights'** below.

❖ SECTION 9.0 - YOUR RIGHTS

As a 'data subject', you have the rights set out in this section. However, certain restrictions may apply in some cases. Please send all requests in writing to the **Data Protection Officer**, at the address outlined in **Section 2C 'Queries and Complaints'** together with enough information to allow us to deal with your request. We need to be certain who you are when you make a request. As a result, we will require you to provide photographic identification [*including your signature e.g. driving licence*] to deal with your request, for verification purposes.

If there are any additional drivers, joint proposers or any other insured person listed on your insurance policy, we will require written authorisation from them, including photographic ID outlining their signature to complete your request as their personal details will also be included on your policy.

Please note that, for most of the following rights, it may take up to one month to process your request, with the possibility of an extension of another two months. If we need the extra time to deal with your request, we will notify you of the fact that there will be a delay and the reasons for it within a month of your request being made. Likewise, if we have reason to refuse your request, we will notify you within a month of the refusal and the reason for it. If we refuse your request, you are entitled to make a complaint to the Office of the Data Protection Commissioner in the Republic of Ireland or the Information Commissioner's Office in Northern Ireland.

We will not charge a fee for any of the requests under this section if we do not consider them to be unjustified or excessive. If we consider a request to be unjustified or excessive we may either deal with the request and charge a fee or refuse the request. We may also charge a fee if you ask us to send you further copies of the information in an access request.

A. RIGHT TO WITHDRAW CONSENT

If we are processing your information on the legal basis of consent, you are entitled to withdraw your consent at any time. Therefore, if we are relying on your consent to allow us to carry out an activity and then you withdraw your consent, we would not be allowed to use your personal data for that activity from that point forward. However, it would not invalidate any processing we carried out prior to your withdrawal of consent.

We do not generally rely on consent for processing personal data in relation to insurance contracts; we generally rely on other legal bases, such as the basis that the processing is required for entering into and performing a contract with you. More details on the legal bases on which we rely are set out in **Section 4 'Use of Information'**. For details on how to withdraw your consent for marketing see **Section 12 'Marketing Information'**.

B. RIGHT OF ACCESS

You have the right to be given details about the personal data that we hold and why and how we process that data. You also have the right to obtain a copy of the personal data we hold about you. This is known as a "Data Access Request".

When you make a request, we would ask that you provide us with as much information as possible to assist us in identifying you [*such as your name, address and policy number*] and the information you want access to. We need to be certain who you are when you make a request. As a result, we will require you to provide photographic identification [*including your signature e.g. driving licence*] to deal with your request, for verification purposes. If you do not provide us with enough information, we may need to contact you for clarification.

If there are any additional drivers, joint proposers or any other insured person listed on your insurance policy, we will require written authorisation from them, including photographic ID outlining their signature to complete your request as their personal details will also be included on your policy.

Please note it may take up to one month to process your request, with the possibility of an extension of another two months. If we need the extra time to deal with your request, we will notify you of the fact that there will be a delay and the reasons for it within a month of your request being made. Likewise, if we have reason to refuse your request, we will notify you within a month of the refusal and the reason for it. If we refuse your request, you are entitled to make a complaint to the Office of the Data Protection Commissioner in the Republic of Ireland or the Information Commissioner's Office in Northern Ireland.

We will not charge a fee for any of the requests under this section if we do not consider them to be unjustified or excessive. If we consider a request to be unjustified or excessive we may either deal with the request and charge a fee or refuse the request. We may also charge a fee if you ask us to send you further copies of the information in an access request.

C. RIGHT OF RECTIFICATION

If the information we hold about you is inaccurate, please let us know and we will make the necessary amendments. Within one month of the receipt of your request we will confirm that these amendments have been made. We will hold on to your Customer Data for as long as necessary for the purposes of providing insurance products and related services to you. Please see **Section 7 'Retention of Customer Data'** for further details.

D. RIGHT OF ERASURE / RIGHT TO BE FORGOTTEN

In certain circumstances you have the right to have the personal data concerning you erased. However, if we are in the middle of your policy then it may affect our ability to provide certain services under your insurance policy.

You may only request the deletion of your data where one of the following situations applies:

1	The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
2	Where the data is processed on the legal basis of consent [<i>see Section 4 'Use of Information' for the legal bases of processing</i>], you withdraw consent and no other legal ground permits the processing;
3	The data subject objects to the processing and there are no overriding legitimate grounds for the processing [<i>see Section 9G 'Right to Object' below</i>];
4	The personal data have been unlawfully processed; or
5	The personal data must be erased for compliance with a legal obligation.

However, this right shall not apply in certain situations, including where the processing of data is necessary for one of the following reasons:

1	For exercising the right of freedom of expression and information;
2	For compliance with a legal obligation, such as the performance of a contract [<i>i.e. your insurance policy or a quote</i>] or compliance with legislation [<i>for example the Consumer Protection Code 2012, which requires us to retain data for at least 6 years</i>];
3	For statistical purposes, where the Right of Erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
4	For the establishment, exercise or defence of legal claims.

Where you request the erasure of personal data, we will need to keep a record of your request, so we know that the deletion has happened and why. This is because we are required by our regulator, the Central Bank of Ireland, to retain records of what we do in relation to our regulated activities. However, we will keep the record in such a way as to remove as much of the information you have asked us to delete as possible, while accurately reflecting the activity.

In certain circumstances we may need to retain some information to ensure all your preferences are properly respected. For example, we cannot erase all information about you where you have also asked us not to send you marketing material. Otherwise, we would delete your preference not to receive marketing material.

E. RIGHT NOT TO BE SUBJECT TO AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING

You have the right not to be subjected to decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affects you.

However, in certain circumstances we are entitled to use automated decision-making and profiling. These circumstances are restricted to situations where the decision is necessary for entering into a contract, or for performing that contract [*i.e. your policy of insurance or quote*], where it is authorised by law or where you have provided your explicit consent.

Where we use automated decision-making, you will always be entitled to have a person review the decision so that you can contest it and put your point of view and circumstances forward. See **Section 8 'Automated Decision-Making'** above.

F. RIGHT TO DATA PORTABILITY

You have a right to receive from us, in a structured, commonly used and machine-readable format, the personal data you have provided to us. You may also request that we send this personal data to another data controller [such as another financial service provider] where technically feasible. Where we do so we will not be responsible for any action of the other data controller in respect of the transferred data.

This right of data portability only applies to personal data that we process on the legal basis of consent or for entering or performing a contract [i.e. providing your insurance policy] and where the processing is carried out by automated means, in other words, the processing is carried out on a computer. See **Section 4 'Use of Information'** for more information on the legal basis on which we process your data. The type of data you may request includes details such as your name, address, other contact details and vehicle details.

If you are planning to exercise this right to transfer your personal data to us from another company, please note the contents of this Data Protection & Privacy Policy before doing so, to make sure you do not provide us with excessive data. We will not be responsible for the quality or accuracy of the data transferred to us.

Where we do receive your personal data from you or directly from another company at your request we will review the contents of the transferred file and delete any information that is inappropriate, excessive, incorrect or otherwise not required. We may use any remaining information for the purposes set out in this document.

In circumstances where you either transfer your data directly to us or you arrange for another company to transfer your data to us on your behalf, we will only hold your data for 10 business days before deleting it, unless you contact us during that period.

G. RIGHT TO OBJECT

Where we state in this document that we process your personal data on the basis of a legitimate interest, you are entitled to object to the processing in question on grounds relating to your particular situation [*see the legal basis for processing set out in Section 4 'Use of Information'*]. We will then stop processing the personal data in question unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or unless we need to use it in relation to legal claims.

Therefore, if you wish to exercise this right, please contact us [*details in Section 2C 'Queries and Complaints' above*] setting out the reason why you want us to stop processing your personal data based on your particular situation. We will then evaluate whether your rights outweigh the necessity of our purpose[s].

However, please note that if you object to us processing your data, we may not be able to provide certain services or benefits you would otherwise be entitled to under your insurance policy.

H. RIGHT TO RESTRICT PROCESSING OF YOUR DATA

In the following circumstances you have the right to restrict the processing of the personal data concerning you that we hold:

- Where you feel that the personal data we hold is not accurate. This restriction will be for a period to enable us to verify the accuracy of your personal data;
- Where the processing is unlawful, and you do not want the personal data to be erased and request the restriction of its use instead;
- Where we no longer need the personal data for the purposes of the processing, but you require it for the establishment, exercise or defence of a legal claim;
- Where you have objected to processing under **Section 9G 'Right to Object'** [*as set out above*], pending the evaluation of whether your rights outweigh the necessity of our purpose[s].

Processing is restricted your personal data will only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of other people or for reasons of important public interest.

Depending on the scope of your request, if your insurance policy is current, then it may need to be suspended or terminated. Also, if you are coming near to the end of your policy, we may not be allowed to process your data to prepare and send you a renewal notice to invite you to renew your insurance policy.

We will only lift the restriction of processing after we have informed you that we are doing so.

❖ SECTION 10.0 - SPECIFIC SERVICE PROVIDERS

In addition to the information set out above, we would also like to draw your attention to some additional information relating to a number of the services we use which involve the processing of your personal data: -

A. CREDIT SEARCHES AND USE OF THIRD PARTY INFORMATION

In assessing your application for insurance, we may search files made available to **MCL Insurance Services Ltd.** by credit checking or credit reference agencies [*including but not limited to County Court Judgments in Northern Ireland, details from the electoral register and information from CIFAS, which is a UK database on fraud*].

We may also pass credit reference agencies information about you and your payment record. The information will be used by other credit lenders for making credit decisions about you and the people with whom you are financially associated for reasons including, without limitation, fraud prevention, money laundering prevention and for tracing debtors.

We may ask credit reference agencies to provide credit scoring computations. Credit scoring uses many factors to work out risks involved in any application. A score is given to each factor and a total score obtained.

Where automated credit scoring is used by us, acceptance or rejection of your application will not depend only on the results of the credit scoring process but may impact your premium and we will enable you to make representations in relation to the result of the search. See **Section 8 'Automated Decision-Making'** for more information.

A. PENALTY POINTS AND CRIMINAL CONVICTION INFORMATION

MCL Insurance Services Ltd. may obtain data on any penalty points which may include the number and reasons for same and driving convictions you may have. The Department of Transport, Tourism & Sport [*DTTS*] in the Republic of Ireland and the Driver and Vehicle Licensing Agency [*DVLA*] in Northern Ireland provide this information.

Where you request a quotation, **MCL Insurance Services Ltd.** may use your driving licence number and the driving licence numbers of all drivers named on your policy [if any] to obtain such information from the DTTS or the DVLA for determining your eligibility and [*if you are eligible*] your premium. We may obtain such information for your current policy of insurance, for the renewal of your policy in every subsequent year for which you are an **MCL Insurance Services Ltd.** policyholder and where there is a change of permitted drivers on your policy.

Where these checks are used by us, acceptance or rejection of your application will not depend only on the results of this process but may impact your premium and we will enable you to make representations in relation to the result of the search.

B. INSURANCE-LINK CENTRAL DATABASE IN THE REPUBLIC OF IRELAND

The Insurance Link Database has been created by Insurance Ireland and the self-insured claims task force to assist their members in the detection and defence of exaggerated claims which may result in prosecutions for fraud.

It contains details of claims made by individuals against insurance policy-holders or directly against self-insured members of the service. The purpose of Insurance Link is to help identify incorrect information and fraudulent claims and, therefore, to protect customers.

Information about claims [*whether by our customers or third-parties*] made under policies that we provide is collected by us when a claim is made, and some details are placed on the Insurance Link database.

This information includes the claimant's name, address and date of birth and the type of injury or loss suffered. Through Insurance Link this information may be shared with other insurance companies, self-insurers or statutory authorities.

We also reserve the right to use the Insurance Link Database during the underwriting stage. To do this, we obtain the information via an authorised third party – "Verisk". We may need to contact you to discuss our findings and request additional documentation. If you feel the information is inaccurate or no longer up to date, we would encourage you to contact the Insurance Link Department. More information about Insurance Link and their contact information can be found at www.inslink.ie.

C. REGISTERS IN NORTHERN IRELAND

In Northern Ireland Insurers pass information to the Claims and Underwriting Exchange Register [*CUE*] and the Motor Insurance Anti-Fraud and Theft Register [*MIAFTR*]. The main aims are to help insurers to verify information provided and to prevent fraudulent claims. When we deal with your request for insurance or any claims made by or against you, we may search these registers.

MIAFTR logs all insurance claims relating to written-off and stolen vehicles in the UK and the service is used to prevent vehicle fraud and assist with the location of stolen vehicles.

In circumstances where you are involved in an incident [*such as accident or theft*], it is a condition of your policy that you must tell us about such an incident, whether you feel it may give rise to a claim or not. When you tell us about such an incident, we will pass relevant information relating to the incident to the Claims and Underwriting Exchange Register, MIAFTR and any other official register set up for checking information and preventing fraud.

Northern Irish law requires that certain information relating to insured vehicles must be entered on the Motor Insurance Database [*MID*]. It is also a condition of your policy that you supply **MCL Insurance Services Ltd.** with such details of the vehicles whose use is covered by the insurance policy so that we may enter the relevant information on the database.

The policy details of customers in Northern Ireland will be added to the MID. MID data may be used by the Driver and Vehicle Licensing Agency for Electronic Vehicle Licensing and by the Police for the purposes of establishing whether a driver's use of the vehicle is likely to be covered by a motor insurance policy and/or for preventing and detecting crime. If you are involved in an accident [*in the UK or abroad*], other insurers and the Motor Insurers' Bureau may search the MID to obtain relevant information relating to you and your insurance policy. People pursuing a claim in respect of a road traffic accident may also obtain relevant information which is held on the MID.

❖ SECTION 11.0 - COMMUNICATION WITH CUSTOMERS

It is envisaged that we may contact you from time to time in relation to various aspects of your dealings with **MCL Insurance Services Ltd.** This contact will relate to the purposes set out in or referred to in this Data Protection & Privacy Policy and may include [*without limitation*]:

1	Administration of your insurance policies;
2	Discussion of renewal terms of existing policies;
3	Discussion of quotations already provided to you;
4	Handling claims and complaints;
5	Marketing products and services and making offers [<i>where you have consented to such contact</i>];
6	Conducting market research

As part of the quotation process we may email you shortly after you receive a quotation to remind you, your renewal due is approaching. The date we use, will be the policy start date outlined on your original quotation.

Other than at your request, we will not make calls to you outside the hours of 9am – 8pm, Monday to Saturday. Our office hours including our Call Centre, operates:

- Mon–Fri: 9am-5pm
- Saturday: 9.30am–1pm

Other than Sundays, our office is closed:

- New Year's Day
- Easter Monday
- Christmas Day and;
- Boxing Day

However, our online service is available 24 hours a day, 7 days a week.

❖ SECTION 12.0 - MARKETING INFORMATION

Where you have told us that you are happy to receive marketing information from us or our business partners, we may contact you from time to time about other MCL Insurance Service Ltd. products that we think may be of interest to you, now and in the subsequent future. This will include on the 12-month anniversary of a quote not taken up or your policy lapsing. This quotation will be based on the details held for you on our system. If these details are no longer accurate we will be more than happy to update them for you. If you have completed more than one quotation, each will follow this process.

To do this we may contact you by post, email and telephone [*including mobile telephone*] using the contact details you have provided to us.

In order to improve our customer service, we may use your data to analyse customer purchasing behaviour (such as time of day, channel used, level of cover) and customer data (such as name, address, renewal dates) to determine the most appropriate marketing offer for you. If you have subscribed to our mailing list, we will continue to hold your full name, email address and contact number for marketing purposes until such times as you "Opt-Out" of this service.

All marketing material will provide you with the opportunity to unsubscribe from our mailing list. If you chose to unsubscribe or "Opt-Out" you will no longer receive great offers and information about our products and services. You can "Opt-Out" at any time by writing to the **Compliance Officer, MCL Insurance Services Ltd., 66 Railway Road, Coleraine, Co. L/Derry, BT52 1PG** or by visiting the following links: -

Brand	Web Address
Its4women.ie	http://www.its4women.ie/unsubscribe.aspx
Its4women.co.uk	http://www.its4women.co.uk/unsubscribe.aspx
25plus.ie	http://www.25plus.ie/unsubscribe.aspx
Seguromo.ie	http://www.seguromo.ie/unsubscribe.aspx
Seguromo.co.uk	http://www.seguromo.co.uk/unsubscribe.aspx
Boxymo.ie	http://www.boxymo.ie/unsubscribe.aspx
Boxymo.co.uk	http://www.boxymo.co.uk/unsubscribe.aspx

Existing customers can remove their details from our mailing list at any time, however, we will still contact you in relation to your insurance policy.

❖ SECTION 13.0 - PROCESSING OF INFORMATION

The processing of information applies to both our online and off-line work practices. As you browse our website, we will monitor what pages you visit in order to give us aggregate statistics about visitors to our site and their preferences. No information is collected that can be used by us to identify individual users on the public part of the website. By disclosing your Customer Data to **MCL Insurance Services Ltd** you indicate your consent to the collection, storage, processing and use of your Customer Data by us as described in this Data Protection & Privacy Policy.

❖ SECTION 14.0 - SECURITY OF CUSTOMER DATA

MCL Insurance Services Ltd is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your Customer Data from unauthorised access, alteration, use, disclosure, accidental loss or destruction. For example, we store the personal information you provide on computer systems with limited access, which are located in controlled facilities.

When we transmit highly confidential information [*such as a credit card number*] over the internet, we protect it through the use of encryption and secure servers.

As effective as modern security practices are, we cannot guarantee the complete security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet.

We operate a "paperless office" and encourage you to use your online portal to upload documents. The facility to send paper documents to our office is still available, however, once received in our office they will be processed, scanned and stored on our secure system and the original copy will be destroyed by the close of business. If, after your document has been processed, you require a copy, we will only be able to provide you with the scanned copy. This does not apply to direct debit mandate forms, they are forwarded to the finance company for the purpose of authorising your loan.

MCL Insurance Services Ltd will continue to revise policies and implement additional security features as new technologies become available.

❖ SECTION 15.0 - USE OF COOKIES

"Cookies" are small text files sent from a website to the hard drive of a user's computer to store bits of information related to that user. Cookies can store information about users, including IP addresses, navigational data, server information, data transfer times, user preferences, and passwords needed to access the special areas on our site.

MCL Insurance Services Ltd uses Cookies for the purpose of storing and retrieving session information in our on-line Motor and Travel Quotes Systems. No Customer Data or Sensitive Data is stored in the Cookie.

15.1 THIRD PARTY COOKIES

In addition to our own cookies, we work with various reputable companies to help us analyse how our website is used, and to optimise our Website and Apps to deliver the best possible experience. The following companies help us achieve this through use of cookies:

A. GOOGLE ANALYTICS AND GOOGLE WEBSITE OPTIMIZER

Google Analytics and Google Website Optimizer are a service provided by Google, Inc. ("**Google**"). Google Analytics uses cookies to help us analyse how users use our website, our mobile site. The information generated by these cookies (including your truncated IP address) is transmitted to and stored by Google on servers. Google will use this information for the purpose of evaluating your, and other users', use of our website, mobile site, compiling reports for us on website activity and providing other services relating to website activity and Internet usage. Please note that Google only receives your truncated IP address. This is sufficient for Google to identify (approximately) the country from which you are visiting our sites or accessing our players, but is not sufficient to identify you, or your computer or mobile device, individually.

Google cookies are those beginning "__ut".

You can find more information [here](#), including a link to [Google's privacy policy](#).

To opt-out of analysis by Google Analytics on our website and other websites, please visit: <http://tools.google.com/dlpage/gaoptout>.

B. GOOGLE ADWORDS AND GOOGLE REMARKETING

We use the online advertising program Google AdWords and the Google Remarketing technology, both operated by the company Google Inc. ("**Google**"). For measuring conversion with Google AdWords, a conversion tracking cookie is placed when a user clicks on one of our advertisements delivered by Google ("**Ads**"). Conversion tracking cookies expire after 30 days and are not used for personal identification. Google uses a different cookie for each Google AdWords customer and there is no consolidation of the cookie data with other data. If you click on one of our Ads and proceed to a page equipped with a conversion tag and the cookie has not yet expired, the conversion is documented. With the help of the conversion tracking cookie we see the total number of conversions and are able to review the performance of our Ads. You can find more information about Google AdWords [here](#).

When you click on one of our Ads, a Google Remarketing cookie is placed. This cookie helps to serve our Ads to you at a later time when you browse pages of the Google content network. Remarketing cookies expire after 30 days and are not used for personal identification. For more information on Google Remarketing, please see [here](#).

Google cookies are those beginning "__ut".

To opt-out of personalized ad delivery on the Google content network, please visit [Google's Ads Preferences Manager](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#).

C. DOUBLE CLICK

We also use DoubleClick, an ad serving service operated by Google Ireland Limited ("Google Ireland"). Google Ireland uses cookies in order to facilitate to show relevant and interesting ads to you. When you interact with our website your browser automatically makes information available to Google Ireland on our behalf, including your IP-address. This information about your use of the website will solely be used to create pseudonym profiles based on your interests. These enable us to display more appealing advertising to you.

You can find more information on Double Click cookies [here](#). If you wish to opt out of personalized ad serving by Google Ireland, please see the Opting Out section below. Please be aware that even if you opt out of interest-based ads, you may still see ads based on factors such as your general location derived from your current IP-address, your browser type and recent, previous searches related to your current search.

D. FACEBOOK

We use Facebook Custom Audiences and Facebook remarketing to deliver advertisements to Website Visitors on Facebook based on email addresses that we have collected and to previous visitors to our site. This allows us to present information and special offers for our products and services to you via Facebook. We also may use information associated with Visitor social media accounts, such as demographic and other information about an individual's title, industry or organization, to improve our marketing efforts if that individual connects those social media accounts to a Website profile.

To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

❖ SECTION 16.0 – SOFTWARE QUALITY

MCL Insurance Services Ltd does not warrant that any information, software or other material accessible through this site is free of viruses, worms, Trojan horses or other harmful component.

MCL Insurance Services Ltd assumes no responsibility and shall not be liable for any direct, indirect, incidental or consequential damages that result from the use, access to, browsing in or downloading of any information, data, text, images or other material accessible through one of its web pages, this site or the website of any linked third party.