

## Footprint Data Protection Information

### Introduction

At Footprint, we understand that protecting your personal information is very important. We take your privacy seriously, and maintain protections and procedures relating to storage and disclosure to keep your personal information secure. It is also important that you know why we collect information about you and any other person covered by this insurance policy, how we use it and with who we may share it.

Personal information (including any sensitive personal data) collected by us is held in accordance with applicable data protection and privacy legislation including (but not limited to) the General Data Protection Regulation (GDPR) (EU) 2016/679 of the European Parliament and of the Council of the 27th April 2016 and the Data Protection Acts 1988 to 2018. The GDPR is designed to provide for greater accountability and transparency with regards to the processing of your personal information, and gives you greater control over the processing of your personal information. You can find more detailed information about our responsibilities to you concerning your data and personal information in the Data Commissioner’s Code of Practise on Data Protection for the Insurance Sector at: [www.dataprotection.ie](http://www.dataprotection.ie)

**Important Note:** This notice explains the personal information we collect, how we use it, and with who we may share it - please read this summary carefully and ensure you understand it. If you provide information about someone else, you are responsible for obtaining their consent to use the information as defined below and for making them aware of the terms of the contract of insurance.

*Sometimes we may need to use your personal information even though you are not a person covered by this insurance policy. For example, if you are a claimant, if your insurance policy has been cancelled / not renewed, or if you are a prospective policy holder applying for a quotation. If you are under 16 years of age, please read this document with a parent or guardian.*

### What Personal Data do we collect about you?

Footprint Underwriting DAC, as a Managing General Agent, need to collect many types of personal data for the purposes we explain in “How we use your information and the legal basis for processing”.

Type	Data Collected
Individual Details	Name, address, contact details, gender, marketing preferences, date of birth, marital status, vehicle details, criminal convictions, penalty points, employer, occupation and family details including their relationship to you.
Identification Details	Identification numbers issued by government bodies or agencies (i.e. PPS Number and Driving Licence Number)
Credit and Anti-Fraud	Credit and Anti-Fraud information such as credit history, credit score, sanctions and criminal offences and information from anti-fraud databases related to you.
Claims Information	Information about current and previous claims (including other unrelated insurances). This may include information about relevant criminal convictions and your health, classed as a Special Category of Data (see below).
Risk Information	Information about you, your residence and your vehicle which we need to collect in order to assess the risk to be insured and provide a quote. This may include Special Categories of Data (explained below).
<b>Special Categories of Data</b>	
Specified categories of personal data also known as “sensitive data” have additional protection under regulation as there could be a greater impact if there was unauthorised use. This special type of data includes information about health (i.e. injuries and pre-existing medical conditions) and relevant criminal convictions.	

#### Why do I need to give accurate information?

It is important that you provide us and your insurance broker with accurate and up to date information at all times (particularly when you are seeking insurance cover or making a claim). If making a claim, incorrect or out of date information may prevent us from providing you with cover or may delay us processing your claim. The provision of false information may mean that a claim made by you under the policy will not be paid and may possibly result in criminal prosecution for fraud and/or cancellation or voidance of your policy.

## **How we use your information and the Legal Basis for Processing**

The information collected, processed and shared by us will be used to manage your insurance with us, and to provide the cover and services in accordance with this insurance policy.

By providing us with your information and proceeding with this contract, you consent to all your information being used, processed, disclosed, transferred and retained for the purposes of insurance administration, including:

- underwriting;
- administration; and
- claims handling.

We may also use your information:

- to fulfill our legal and regulatory obligations;
- during the course of audits, training, system integrity checks and risk management assessments; and
- to support our legitimate business interests in managing our business, such as improving our products and services, preventing and detecting crime, statistical analysis and obtaining reinsurance cover (see below).

We may amend the personal information for some uses so that you cannot be identified from the data either by itself or when combined with other any other data we hold.

## **Who we share your information with**

Information provided by you (or on your behalf) will be treated in confidence. However, in order to administer your policy, to detect and prevent crime (such as fraud and money laundering), and to comply with our legal obligations, we may need to share or verify information about you and your claims history with:

- your Insurance Broker;
- our Agents and Service Providers;
- our Insurer's, their Reinsurance Brokers and Reinsurers who will use the to decide whether to provide reinsurance cover, the terms for such and in complying with their legal obligations (such as we use your data to manage as explained above);
- Loss Adjusters, Expert Appraisers, Motor Assessors or Investigators to help us investigate claims. Acting in the interest of Footprint Underwriting they handle your claim honestly, fairly and professionally, with all due skill, care and diligence. You may hire an expert or advisor to act on your behalf at your own expense;
- other Insurers and their Agents (such as Loss Adjusters, Private Investigators and Solicitors);
- Recognised Trade, Governing and Regulatory Organisations we belong to or are governed by persons or organisations where required to by law (such as An Garda Síochana);
- Fraud Prevention Agencies / Databases e.g. Insurance Link (if you provide false or inaccurate information, we will record this); and / or
- any other person, where necessary, to perform any insurance contract with you, so we can protect ourselves from risk or to make sure we meet with regulations or good governance.

These companies and organisations may on occasion be based outside of the European Economic Area. We will aim to ensure that the level of protection applied to the processing of your personal information within these countries is similar to that applied in Ireland, specifically that:

- any transfer of information is lawful;
- your information is kept securely; and
- your information is only used for the purposes detailed in this Data Protection Notice.

### **How we obtain your Information**

We use a network of approved brokers to gather information from you directly, your family / insured drivers, insurance broker, legal representatives where appropriate, anyone authorised to act on your behalf, anti-fraud databases such as Insurance Link, other databases such as anti-money laundering and sanctions checks, publicly available information, third parties (i.e. in event of claim), Government Agencies, Trade Organisations and Statutory Bodies.

Please note all requests to change or alter a policy for you or any other insured drivers should be submitted to your insurance broker.

Telephone calls to Footprint Underwriting or our Service Providers may be recorded or monitored to protect you and for training and verification purposes.

### **In the event of a Claim**

We will work with you to try and resolve your valid claim as quickly and fairly as possible. We will manage your claim in line with the Central Bank of Ireland's (CBI) Consumer Protection Code, which you can read at [www.centralbank.ie](http://www.centralbank.ie).

When you notify or advise us of an incident that may result in a claim we will record the details in our database. Sometimes, we may ask you to complete a Claim Form. We will let you know if this is necessary. You should provide the information and/or documents that we ask you for within the timeframe indicated. This helps us progress your claim efficiently. It also means you will meet any relevant policy conditions.

We are obliged under the Consumer Protection code to inform you that similar insurance contracts in the future may be affected by any claim made under your policy. You are obliged to tell any future insurer about any insurance claim made under your policy when seeking quotations for similar contracts. For clarification of your own circumstances you should speak to your broker or our Claims Team on 01 908 9030.

### **Insurance Link**

We may share information about any claims with the Insurance Link database, run by Insurance Ireland or similar. The information stored within such may include identification details and the nature of any loss or damage suffered by you or any third parties involved in a claim incident, including details relating to any bodily injuries sustained. This information may be shared with other insurers or Government Agencies. The information helps us to:

- verify that claims information matches that provided when cover was taken out;
- prevent multiple claims for the same personal injury or damage; and
- detect fraud, and to provide a basis for the investigation of suspected fraud.

By visiting [www.inslink.ie](http://www.inslink.ie) you can find out what information is held about you and your previous insurance claims on the Insurance Link database.

### **How long we hold your information**

The personal information you provide will be retained for as long as necessary for the purpose of providing insurance products and related services to you, or for the period required under relevant legislation and regulations - for example, 15 months for quotes, 6 years after end of policy or up to 18 years if a minor is suspected to be involved in a claim.

## Your Data Protection Rights

By submitting personal data, you and any other person covered by this insurance policy agrees to the transfer, storing or processing of personal information as outlined above. However, this privacy policy does not affect your statutory rights:

- to have access to review the information we hold about you;
- to correct any information that is incorrect and ensure anyone whom we have passed that information to is notified of the correction;
- subject to some limitations, the right to have information deleted. We are required to maintain records to comply with regulations, and to ensure we can fulfil our obligations under the contract (e.g. to handle claims, even after the policy has been cancelled);
- to restrict how we use (or "process") your information;
- to have your information made available in a way that is "portable";
- to object to "processing" of your information;
- to have automated decisions reviewed – this may not always be possible if the decision is necessary to enter into a contract (see below); and
- to lodge a complaint with the relevant Supervisory Authority.

If you have any questions about our Data Protection and Privacy Policies or practices, please write to our Data Protection Officer at:

Data Protection Officer care of Compliance Team  
Footprint Underwriting DAC  
Level 1 – The Chase  
Carmanhall Road  
Sandyford  
Dublin 18  
[info@footprintunderwriting.ie](mailto:info@footprintunderwriting.ie) or [complaints@footprintunderwriting.ie](mailto:complaints@footprintunderwriting.ie)

## Automated Decision Making

Automated decisions are those decisions based on processing information by a computer only - and are permissible where the decision is necessary to enter into a contract or for administering the contract. Where a decision based on automated decision making (or profiling) produces significant or legal effects concerning you, you are be entitled to have that decision reviewed by a person, along with any additional information you wish to have considered.

Automatic decisions (including profiling) are made during our Underwriting Process. This is the process by which we use computer programs and models to review the information provided in order to accept or reject risks, apply special terms and calculate premium (if applicable). Our mathematical models developed to assess risks (accept / reject risks / apply special terms) and calculate applicable premium are confidential business information.

Automatic profiling may also be used in statistical / risk analysis.

## If you would like a copy of information that we hold about you

Under the General Data Protection Regulation 2016 you have a right to request a copy of your personal data held by us and/or to request that any incorrect information is rectified. Requests should be sent to [info@footprintunderwriting.ie](mailto:info@footprintunderwriting.ie) or Head of Compliance, Footprint Underwriting, Level 1 – The Chase, Carmanhall Road, Sandyford, Dublin 18, D18 Y3X2.

You may be asked to prove your identity before we can grant your request and in rare instances, where a request is deemed to be excessive, a reasonable fee may be charged taking into account the administration costs to process the request. Unless you have specifically requested otherwise, the information will be sent to you electronically. If you believe there are errors in the information held about you, you can request to have the data corrected, amended or blocked from our records (subject to some limitations).

Please allow up to 30 days for us to send the information to you or rectify any incorrect information.

### **Links to other websites**

Our website may contain links to other websites which are operated and controlled by third parties which may or may not have their own Privacy Policies. Footprint Underwriting are not responsible for privacy practices of third parties to whom you provide your information. You should read the Privacy and Cookie Policies or practices on all third-party websites before using or providing your information to them.

### **Changes to our Privacy Policy**

We will update our Privacy Policy from time to time. All relevant documentation will be updated and we will post any changes on our websites so that you are always aware of the information we collect, how we use it, and under what circumstances we disclose it.

### **Your Feedback and Complaints**

We hope you are happy with the service you receive, and all feedback is welcomed. Telling us your concerns helps us to put matters right and improve our service to all our customers. If you wish to provide feedback or make a complaint, you should initially contact the insurance broker with whom you arranged your policy. If your complaint is not resolved to your satisfaction, you may complain in writing to the Head of Compliance, Footprint Underwriting, Level 1 – The Chase, Carmanhall Road, Sandyford, Dublin 18, D18 Y3X2.

Email: [complaints@footprintunderwriting.ie](mailto:complaints@footprintunderwriting.ie) Website: [www.footprintunderwriting.ie](http://www.footprintunderwriting.ie)

Telephone: 01 908 9040

We will endeavour to resolve the matter as quickly as possible and within a maximum period of 40 working days in accordance with the Consumer Protection Code 2012. If we have given you our final response and you are still dissatisfied, you may refer the case to: The Financial Services and Pensions Ombudsman's Bureau, 3rd Floor, Lincoln House, Lincoln Place, Dublin 2, D02 VH29.

Email: [info@fspoi.ie](mailto:info@fspoi.ie) Web: [www.fspoi.ie](http://www.fspoi.ie)

Telephone: + 353 1 567 7000

If your complaint relates to our responsibilities regarding your information under the General Data Protection Regulation you may wish to contact the Data Protection Commissioner. 21 Fitzwilliam Square South, Dublin 2, D02 RD28.

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie) Web: [www.dataprotection.ie](http://www.dataprotection.ie)

Telephone: + 353 578 684 800 / + 353 761 104 800

## **Cookies Policy**

This website is owned by Footprint Underwriting Designated Activity Company (DAC). Our cookies policy explains about the type of cookies we may use when you visit our website.

### **What are cookies?**

Cookies are small files that websites place on the device you are using to browse the site. Cookies are commonly used to record some aspect of your visit to a site, such as choices you have made or preferences you have set during your visit. We use cookies to give you the best experience when you visit our website. By using cookies, we can make it easier for you to do many things, such as managing your accounts, policies, or login details, and applying for products and services. Cookies can also allow us to tailor the content of our website, so we can show you services or adverts we think you may be interested in.

### **What types of cookies do we use?**

#### **Strictly necessary cookies:**

These cookies enable you to get the information or service you've asked for. Common uses for this type of cookie include:

- Storing information so that shopping baskets can be provided;
- Storing information for e-billing;
- Allowing users to log in or access private areas of a site.

#### **Performance cookies:**

These cookies collect information about the pages you visit, where you go most often and whether you see error messages. The information is only used to ensure a website works well. Common uses for this type of cookie include:

- Collecting information about which pages' visitors go to most often;
- Noting if visitors get any error messages from web pages;
- Understanding which links visitors like to follow (including adverts) and which they choose not to.

#### **Functional cookies:**

These cookies remember choices you've made to personalise the site. They may remember where you are, so you can get tailored information, or remember changes you have made to help you browse. Common uses for this type of cookie include:

- Collecting information about which pages visitors go to most often;
- Noting if visitors get any error messages from web pages;
- Understanding which links visitors like to follow (including adverts) and which they choose not to.

#### **Targeting or advertising cookies:**

These cookies collect anonymous information about your browsing habits which are then used to make advertising relevant to you. They remember if you have visited a website and share this information with advertisers.

You can visit [All About Cookies](#) if you would like to know more about cookies.