



Terms of Business

### **Who is Footprint Underwriting?**

Footprint Underwriting DAC trading as Footprint Underwriting is a Managing General Agent distributing insurance products via Insurance Intermediaries (Insurance Brokers).

Our Private Car Insurance is underwritten by Accredited Insurance (Europe) Limited and our Motor Legal Expenses Insurance is underwritten by ARAG LEGAL PROTECTION LIMITED.

Footprint is authorised by the following:

- Central Bank of Ireland: Footprint Underwriting is authorised and regulated as an Insurance Intermediary under the European Union (Insurance Distribution) Regulations 2018 (the “IDR”) by the Central Bank of Ireland. Our Central Bank of Ireland authorisation number is C120744.
- We are bound by the Central Bank of Ireland’s codes of conduct including the Consumer Protection Code 2012 and the Minimum Competency Code 2017. These codes of conduct are in place to protect consumers when dealing with regulated financial services providers. A copy of these codes can be found on the Central Bank of Ireland’s website – [www.centralbank.ie](http://www.centralbank.ie).
- Copies of our authorisations are available on request or, alternatively, you can verify this information on the Central Bank of Ireland’s Register at [registers.centralbank.ie](http://registers.centralbank.ie).
- Data Protection Commission: We are also registered with as a Data Controller with the Data Protection Commissioner.

### **Statutory Codes**

Footprint Underwriting is subject to and complies with the Consumer Protection Code, the Minimum Competency Code and the Fitness and Probity Standards as laid down by the Central Bank of Ireland. These codes can be accessed on its website at [www.centralbank.ie](http://www.centralbank.ie).

### **Company Registration**

Footprint Underwriting is registered in the Companies Registration Office under Registered No. 5215050 with registered offices at Level 1, The Chase, Carmanhall Road, Sandyford Industrial Estate, Sandyford, Dublin 18.

### **Law Applicable & Language**

Please note that the law of the Republic of Ireland will apply to this contract of insurance and Irish Courts will have jurisdiction to hear any disputes regarding your policy, unless otherwise stated in the policy terms and conditions. This contract of insurance and all communications will be in English.

If we decide to change our terms of business, we will update all relevant documentation and post any changes on our website.

### **Compensation Schemes/Client Protection**

Footprint Underwriting is a member of the Investor Compensation Scheme, set up under the Investor Compensation Act 1998. In the event that a right to compensation is established, the amount payable is 90% of your loss which is recognised as being eligible for compensation, subject to a maximum of EUR20,000.

### **Conflicts of Interest**

It is our policy to avoid situations where there is a conflict of interest. Should such a situation arise or could be perceived to arise we will declare it as soon as is practicable to do so. If you feel that a conflict of interest exists or that your interests have not been protected, please contact us.

### **Complaints Procedure**

We want to hear any feedback or complaint you may have about the service you received. Telling us your concerns helps us to put matters right and improve our service to all our customers. If you wish to 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 contact the Compliance Manager, Footprint Underwriting, Level 1 – The Chase, Carmanhall Road, Sandyford, Dublin 18.

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

Telephone: 01 9089040

We will endeavour to investigate 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, 3<sup>rd</sup> Floor, Lincoln House, Lincoln Place, Dublin 2.

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

Telephone: 01 567 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, Dublin 2.

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

Lo Call: 1890 252 231Mid Term Adjustments

Your broker must be contacted concerning any alterations that you may require during Your period of cover.

### **Cancellation**

You are entitled to cancel your policy at any time by writing to your broker along with the return of the relevant Certificate of Motor Insurance and Insurance Disc.

If you do not fully disclose all material facts to us or you do not comply with any terms of the contract such as returning documentation requested or do not pay your premium, we may choose to cancel your policy or treat it as invalid or as if it had never existed.

If we cancel your policy, we will inform you of the cancellation by registered letter, giving you 10 days' notice of cancellation. If we decide to take this action, you are required to return your Certificate of Motor Insurance and Insurance Disc to your broker immediately. If your policy is cancelled by an insurer you should disclose this to all future insurers and it may affect your eligibility with us or other insurers.

If an accident, incident or claim has already been reported to us prior to the effective date of the cancellation, or if there has been an accident or incident that is likely to give rise to any claim during the **period of insurance**, we reserve the right to retain the premium **you** have already paid in full or to collect the premium in full.

### **Cooling off period**

Under the relevant Distance Marketing Regulations, we allow a 'cooling off' period when you take out your insurance over the phone or online with your broker. This is 14 working days from the date you take out the insurance policy.

We will not impose any financial cost beyond the cost for the time that you were on cover, should you decide to cancel the policy within the 14 working days.

### **Paying for your insurance**

Footprint Underwriting do not sell or distribute policies directly to customers. To purchase a policy, you must apply through an insurance broker. Your broker will collect the required information to make an application, explain the policy benefits and exclusions to you and accept the premium for the policy. During the policy year and at renewal your insurance broker will administer any required changes, answer policy queries and collect any further premiums or issue refunds that may generate.

### **Policy charges and remuneration**

Footprint Underwriting are remunerated by way of a combination of commission from our Insurance Capacity Provider/s for arranging the policy with them, administration and cancellation charges.

All premiums quoted by Footprint Underwriting will include any applicable Government Levy and/or Stamp Duty and policy charges as outlined below.

<b><u>Transaction</u></b>	<b><u>Charge</u></b>
Administrative Charge	Up to €15

### **Why does Footprint Underwriting collect and use personal data?**

Footprint Underwriting is regulated as an Insurance Intermediary by the Central Bank of Ireland and registered as a Data Controller with the Data Protection Commissioner.

### **Why does Footprint Underwriting collect and use personal information?**

We recognise that protecting personal information is very important and we understand that you and any insured driver have an interest in how we collect, use and share such information. Any personal information will only be held and processed in accordance with the General Data Protection Regulation 2016.

Please read this Privacy Policy and Data Protection Notice carefully as it outlines how we use personal information and other information that has been provided to us by you (or on your behalf). You should show this Privacy Policy and Data Protection Notice to any other person who is covered by this insurance policy and obtain their permission to share their personal information with us, on the basis that their personal information will be used in the manner outlined below. 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.

To provide our services as a Managing General Agent, we will ask your Insurance Broker to collect information about you, such as your name, contact details and vehicle details. We may also include special categories of personal data (e.g. about your health) and information relating to criminal

convictions and motoring offences. All personal information (including any sensitive personal data) acquired by us is held in accordance with all applicable legislation relating to data protection and privacy including (but not limited to) the Regulation (EU) 2016/679 of the European Parliament and Council of the 27<sup>th</sup> April 2016 and we maintain protections and procedures in the storage and disclosure of personal information to keep it secure and prevent unauthorised access to or loss of such information.

Subject to Data Protection Laws, the information that you provide to us and/or to your Insurance Broker will be used to manage your insurance with us, including underwriting, claims handling, fraud detection, policy administration and statistical analysis. It may on occasion be necessary to collect sensitive data relating to you, any insured driver, or any other person who is covered by this insurance policy, such as mental health or other health records, criminal convictions, pending legal proceedings and bankruptcy or debt details in order to administer this policy or process any claim. Your information may also be processed during the course of audits, system integrity checks and risk management assessments.

All requests to change or alter a policy for you or any other insured drivers should be submitted to your Insurance Broker.

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

It is important that you provide us 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 invalidate cover provided by this insurance policy, resulting in rejection of a claim or reduce the amount we pay and may possibly result in criminal prosecution for fraud and/or cancellation.

#### **Sharing of Information**

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

- your Insurance Broker;
- our Agents, Service Providers and our Insurer/s;
- 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); 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.

Telephone calls to Footprint Underwriting or our Service Providers such as Your Broker may be recorded or monitored to protect you and for training, verification and quality purposes. We may request copies of call recordings from a Service Provider for the purposes of dealing with complaints, detecting fraud, ensuring the accuracy of customer information. We may also request a call recording from a broker for training, quality and verification purposes.

### **Insurance Link**

We may share information about any claims with the Insurance Link database, run by Insurance Ireland or similar organisations. 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 bodies. 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.

### **Retention of Personal 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 allowable under the relevant legislation at the time the information is provided. Under the Consumer Protection Code 2012, this is a minimum period of 6 years from when you cease to be a client of ours, or for 6 years following the last transaction or finalisation of a claim you have been involved in.

### **Links**

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 and Data Protection Notice**

If we decide to change our Privacy Policy and Data Protection Notice, we will update all relevant documentation and 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.

### **How we manage your 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. You can read the code at [www.centralbank.ie](http://www.centralbank.ie). When you notify or advise us of a claim or 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 must provide the information and 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.

### **What are your Data Protection Rights?**

By submitting personal information, a policyholder 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 personal 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 personal 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 personal information.
- to have your personal information made available in a way that is "portable".
- to object to "processing" of your personal information.
- to have automated decisions reviewed – this may not always be possible if the decision is necessary to enter into a contact.
- to lodge a complaint with the relevant Supervisory Authority.

You can find further details about our responsibilities to you concerning your personal information in the Data Commissioner's Code of Practice on Data Protection for the Insurance Sector at: [www.dataprotection.ie](http://www.dataprotection.ie)

If you have any questions about our Privacy Policy and Data Protection Notice or practices, please write to our Data Protection Officer at Footprint Underwriting.

### **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 information 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 Data Protection Officer, Footprint Underwriting, Level 1, The Chase, Carmanhall Road, Sandyford, Dublin 18.

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.

### **Legal Basis for Processing**

We process your personal information and sensitive personal information where it is in our legitimate interest to do so, in particular, to enter into a contractual relationship and provide you with an insurance policy. We may also process personal information and sensitive personal information to comply with legal obligations to which we are subject. 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;
- statistical analysis;
- claims handling; and
- fraud prevention.

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

### **Cookies Policy**

This website is owned by Footprint Underwriting Designated Activity Company (DAC). Please refer to our Cookies Policy which 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.