



## Data Protection Statement – Allianz plc Fair Processing Notice

This privacy statement/notice tells you how we use your information and confirms that your Data Controller is Allianz plc (“we”, “us”, “our”), Allianz House, Elmpark, Merrion Road, Dublin 4, D04 Y6Y6, Ireland. Email: info@allianz.ie. Our Data Protection Officer is contactable at: DataProtectionOfficer@allianz.ie or please write to The Data Protection Officer, Allianz plc, Allianz House, Elmpark, Merrion Road, Dublin 4, D04 Y6Y6, Ireland.

### 1. What Personal Information We Collect

#### *Type of Information*

The type of information we collect and use will differ depending on the type of product or service you have with us but includes (please note that this is not an exhaustive list):

Name, address (including Eircode), date of birth, policy numbers, contact details (mobile number and email address for customer identification and digital communication purposes), PPS number (or any other relevant tax identification numbers) (if required by legislation), occupation, employment details, gender, insurance requirements including details about your home or vehicle, years of residency in Ireland or the UK, driving licence details, marketing preferences and renewal dates of policies with other insurers, claims history, bank and payment card details, records of payments and arrears, VAT and other relevant tax numbers, CCTV footage, membership status of any relevant bodies, penalty point information and Road Traffic offences, telematics data, dashboard camera video footage, credit score and on-board vehicle diagnostics information. Further details of information we collect can be found under specific headings in this Data Protection Statement. Further details of information we collect can be found under specific headings in this Data Protection Statement.

#### *Other People’s data:*

As well as collecting your personal data, we may also use personal information about other people, for example, family members you wish to insure on a policy, dependents (where relevant for suitability purposes), insured persons (where different from the applicant/policyholder) family health history of insured persons, limited personal information about trustees/beneficiaries (where policies are under trust), executors, nominated representatives and attorneys (under power of attorney).

If you are providing personal information about another person in paper or electronic format or video we require you to let them know what information you’ve shared with us, share this data protection notice with them and ensure that they have given you permission to provide this information to us. If you or they have any concerns please ask them to contact us in one of the ways described in this notice. Special categories of data of other’s people will be processed solely if they are necessary for the provisions of a policy of insurance and for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

#### *Sensitive information*

We may ask for health information or details of past or pending offences, unspent criminal convictions or other sensitive information about the person who is being insured, their family members or any other persons associated with the insurance policy. We recognise the sensitivity of collecting this information, so we will only ask for it to arrange, manage or administer an insurance contract, handle claims, or prevent fraud. Where we process health data for the purpose of a policy of insurance we will take suitable and specific measures to safeguard the fundamental rights and freedoms of individuals.

Given the fact that data relating to health and criminal convictions is particularly sensitive information, we only collect and use such data as follows:

**Purpose:** Health data is used for the purposes of obtaining/providing quotes and providing insurance services; to assist in the administration of a policy, including fraud prevention and investigation, handling a complaint or processing a claim

**Basis:** Irish Data Protection law permits us to use health data where we need to and where it is proportionate for the purposes of a policy of insurance.

**Purpose:** Unspent criminal conviction data is collected and used for the purposes of obtaining/providing quotes and providing insurance services; to assist in the administration of a policy, including fraud prevention and investigation, handling a complaint or processing a claim

**Basis:** Performance of a contract: under which we provide insurance services and assisting in the administration of a contract (the insurance policy); and to take steps at your request before entering into a policy (e.g. obtaining/providing a quote)

We may also need to use your health and/or criminal data for the purposes of establishing, exercising or defending legal rights, including in connection with claims or proceedings and where authorised by law.

**You do not have to provide us with any personal information, however, should you be unable to provide us with the required personal data, we will be unable to provide you with a quote, insurance or process a claim that you make.**

### 2. How we collect your personal information

We may collect personal information about you from: you; your named driver (if you are purchasing or renewing a motor policy); joint policyholder; our intermediaries, your broker (or other representative), insured persons (where different from the applicant/policy owner); when you visit one of the Allianz Group websites (where you are purchasing or renewing a policy) or through cookies and other similar technologies when you visit our website or download and use one of our apps; when you visit a website aggregator; insurance industry databases and other commercial databases; third parties involved in a claim (including a claimant, private investigators engaged by us, witnesses, solicitors, health practitioners, medical representatives and independent experts); from public authorities; communicating with us via social media platforms; requesting any information from us; other people who live with you in an insured property (if you are purchasing or renewing a home insurance policy); your agents, attorneys (under powers of attorney), nominated representatives (including health practitioners and medical representatives) and other third parties relevant to you and/or the policy, including your legal advisers; publicly available information including social media websites and online content, newspaper articles, TV, radio and other media content, court judgements; telephone calls, which we may record, analyse or monitor for insurance, regulatory, training and quality purposes; other records within Allianz if you have or have had other insurance policies with or sought a quote from us or another Allianz company or third party claims; Insurance Ireland (insurance industry’s representative body) who operate a confidential phone line (Insurance Confidential) for individuals to report suspect fraud; and Credit referencing agencies.

Where you provide personal data relating to any person under the age of 16 years (“child”), Allianz will seek to verify that you are the parent/guardian of such a child. This is to ensure that you can authorise the processing of personal data relating to that child in order for Allianz to provide the insurance, deal with a complaint or claims.

### 3. How we use your personal information

**Purpose:** to obtain/provide a quote, for underwriting and pricing an insurance policy including making a decision as to whether we can provide you with cover and at what price; and to investigate, validate, arrange, handle, manage or administer a claim which you or another person makes in relation to your insurance policy.

**Legal Basis:** Legitimate interest in managing our business; for the performance of a contract under which we provide insurance; and in order to take steps at your request prior to entering into a contract of insurance.

**Purpose:** To provide you with insurance cover, administer and process your insurance policy, including dealing with any queries or changes, payments, renewals and processing a cancellation of your policy; make payments to you or receive payments from you; provide you with services such as breakdown assistance; processing of any complaints; and maintain and store records on our computer systems.

**Legal Basis:** For the performance of a contract under which we provide insurance.

**Purpose:** To verify your identity.

**Legal Basis:** In order to take steps at your request prior to entering into a contract of insurance; for the performance of a contract under which we provide insurance; to comply with legal obligations.

**Purpose:** To carry out financial sanctions checks and prevention of financial crime.

**Legal Basis:** For the performance of a contract under which we provide insurance; in order to take steps at your request prior to entering into a contract of insurance; to comply with legal obligations; and public interest.

**Purpose:** To comply with laws and regulations.

**Legal Basis:** To comply with legal obligations. For motor policies only, in compliance with the Road Traffic Act 1961 (as amended) we share details of your policy with the Motor Insurers Bureau of Ireland (The details on MIBI processing activity can be found on <https://www.mibi.ie> MTPL section), the Minister for Transport, Tourism and Sport and An Garda Síochána for the purposes of section 78A as autonomous data controllers.

**Purpose:** For marketing purposes, market research, customer satisfaction surveys, and data analytics including profiling, to develop and enhance our service and products, the customer relationship and journey as part of our business strategy; for management information purposes including portfolio assessment, risk assessment, performance reporting and management reporting; for a proposed portfolio transfer, reorganisation, transfer, disposal or other transaction relating to our business; managing our business effectively (e.g. with third party service suppliers); for audit purposes and managing our legal affairs including exercising our legal rights and defending claims; to maintain arrangements we have with reinsurers; for quality purposes; to manage our IT security and network; to carry out statistical analysis and reporting to help improve services and products; staff training in how to perform their duties and provide a better service to you; monitor recorded customer calls to assess our staff's customer service; provide online services; and to enhance our applications and product offerings.

**Legal Basis:** Legitimate interest in managing our business; to better understand our customers; improve product and/or service enhancement; and monitor and assess business performance.

**Purpose:** To detect and prevent fraud.

**Legal Basis:** For our legitimate interest in managing our business; in order to take steps at your request prior to entering into a contract of insurance; for the performance of a contract under which we provide insurance; and to comply with our legal obligations.

*If you are purchasing a policy, we also use certain information and consult certain databases as follows:*

**Information Used:** logging of any new claims notifications and any claim settlement for damage and injury.

**Purpose:** to confirm your personal data and verify claims information and/or for prevention and detection of crime and fraud through the Claims and Underwriting Exchange Database and Insurance Link Anti-Fraud register.

**Processing is necessary:** to comply with legal obligations.

**Information Used:** address details.

**Purpose:** to verify address and surrounding location information using the Ecad Database.

**Processing is necessary:** in order to take steps at your request prior to entering into the policy or for the performance of your policy.

**Information Used:** vehicle registration number.

**Purpose:** to identify whether a vehicle has been taxed, NCT or if the vehicle has been involved in a claim or written off using the VRN system.

**Processing is necessary:** in order to take steps at your request prior to entering into the policy or for the performance of your policy.

**Information Used:** Driving Licence Number.

**Purpose:** to validate your driving licence number with the relevant authority; to validate the number of penalty points disclosed by you; to validate the licence date and country of origin of the licence.

**Processing is necessary:** in order to take steps at your request prior to entering into the policy or for the performance of your policy.

**Information Used:** registration number of your vehicle.

**Purpose:** provide information about your insurance policy for inclusion in the Motor Third Party Liability Database (MTPL); the information contained on this database may be used by government bodies such as an Gardai Síochána (Gardai) and the Motor Insurance Bureau of Ireland (MIBI) for purposes permitted by law, including electronic licensing and law enforcement.

**Processing is necessary:** to comply with legal obligations.

**Information Used:** registration number of your vehicle.

**Purpose:** If you have a commercial motor fleet or motor trade policy, you will be issued with a Unique Identification Number by your insurer to upload your personal information on to the National Fleet Database. We and other government bodies such as the Gardai and MIBI can check this database for the information you have uploaded. For further information, please go to [www.nfd.ie](http://www.nfd.ie).

**Processing is necessary:** in order to take steps at your request prior to entering into the policy or for the performance of your policy; and to comply with legal obligations.

**Information Used:** vehicle registration number and No Claims Discount (NCD) PIN.

**Purpose:** When we provide you with a quote or renew your policy of motor insurance, we access the National Vehicle Data File controlled by the Department of Transport, Tourism and Sport to validate: driver numbers; and number of penalty points per driver.

Where you provide us with an NCD PIN number, we will verify your No Claims Discount information using the IIDS Hub, where such information is made available by your previous insurer.

**Processing is necessary:** in order to take steps at your request prior to entering into the policy or for the performance of your policy.

#### 4. How we share your personal information with others

We may share your personal information with: the Allianz Group, our agents, third parties who provide services to us (engineers, repairers, motor assessors, loss adjusters, expert appraisers, expert witnesses etc. your intermediary and other insurers (either directly or via those acting for the insurer such as loss adjusters or investigators); providers of essential services (e.g. telecommunications, postal/courier providers, IT service providers, software providers, card payment processor in their role as independent data controllers <https://www.aibms.com/privacy/>); other third parties involved in administering your contract; regulatory bodies and law enforcement bodies, including the Garda (for example, where we are required to do so to comply with a relevant legal or regulatory obligations); reinsurers who provide reinsurance to Allianz (reinsurers will use your data to decide whether to provide reinsurance cover, assess and deal with reinsurance claims and to meet legal obligations; they will keep your data for the period necessary for these purposes and may need to disclose it to other companies within their group, their agents and third party service providers, law enforcement and regulatory bodies); witnesses to any accidents/incidents to which you are involved; any party you have given us permission to speak to (e.g. your representative, a relative or a friend); any party named under your insurance policy; industry and trade bodies; and claimants and their legal or medical representatives.

The personal information you provide may be used by us and shared with other insurers as well as certain statutory and other authorised bodies for anti-fraud purposes: other insurance companies to confirm information provided (including where you are purchasing a motor insurance policy, for the purposes of validating any No Claims Discount) and to safeguard against non-disclosure and help prevent fraudulent claims; public bodies including the Department of Tourism, Transport and Sport, the Department of Finance and the Gardai; the Insurance Link Anti-Fraud register (for more info see [www.inslink.ie](http://www.inslink.ie)) to prevent and detect fraud; the Integrated Information Data System (IIDS) to verify information including penalty points and No Claim Discount (NCD) to combat fraud; the Motor Insurers' Bureau of Ireland (MIBI) to assist in preventing or detecting theft and fraud and to pay claims; private investigators, tracing debtors or beneficiaries, recovering debt, managing your accounts and/or insurance policies; vehicle history check suppliers/databases to protect our customers, inform our acceptance criteria and assist in claims investigations; and other fraud prevention, ID verification databases available in the insurance industry and publicly available information to detect or prevent possible criminal activity or fraud.

We will use your personal information to detect and prevent fraudulent practices and fight financial crime to meet our regulatory responsibilities. If you purchase a product from our website or other Allianz sales channel, we will also ask you for payment details. We need this information so we can process the payment associated with any product purchased. We collect information to help us improve our products and services and let people know about products and services that we believe will be of interest to them. This may be through a range of channels including via email, online advertising or social media. We will always do this in accordance with marketing preferences provided.

Where we obtain data from the above sources, the categories we obtain will be personal data or claims information relating to insurance profiling, claims handling and fraud prevention. We may need your consent for the processing of certain data and in these cases, we will inform you of such processing and the reason for this at the time consent is captured.

#### Protecting Information Outside the European Economic Area

Your personal data may be transferred to and/or accessed from a country outside the European Economic Area ("EEA"). We will always take steps to ensure that any transfer of information outside the EEA is carefully managed to protect your privacy rights. Such transfer/access within the Allianz Group will be covered on the basis of the Allianz Group binding corporate rules (BCRs) known as the Allianz Privacy Standard (APS) which contractually obliges each member to ensure that your personal information receives an adequate and consistent level of protection wherever it is transferred within the Group. Where we transfer your data to a non-Allianz Group member or other companies providing us with a service, we will obtain contractual commitments and assurances from them to protect your personal information. These assurances are well recognised certification schemes like Standard Contractual Clauses. We will only transfer your personal information to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. Any requests for information we receive from law enforcement or regulators will be carefully validated before personal information is disclosed.

#### Representation

If you provide information about someone else, such as an additional insured, we will endeavour to provide this Data Protection Statement to them. Where it is not possible to do so, you must make them aware of this Data Protection Statement and the terms of the insurance (including changes to the terms or processing activities) and encourage them to read this Data Protection Statement to find out more.

#### Online Information

When you visit the [www.allianz.ie](http://www.allianz.ie) website, we may record information about your computer or mobile device, including hardware and software used, general location, when and how you interact with our websites. This information is used to note your interest in our websites and improve customer journeys.

#### How long we keep your personal information

We will keep your personal data only for as long as it is required for your insurance contract, to handle claims and to comply with our legal and regulatory obligations as documented in our Records Management Policy. For the majority of policy data, this is seven years after the end of that transaction. If you do not accept a quote or complete an application for an insurance policy, your data will be kept for fifteen months and processed in line with this Statement. When a potential claim or actual claim is taken out on a policy, we hold details around this claim until a full and final settlement has been agreed. In most cases this should be seven years after the final settlement date or where a child was involved the later date of seven years after the child has turned eighteen or the settlement date. In certain cases, we are obliged to hold onto records for longer periods and we do so in line with our legal responsibilities. For more information on our data retention policies please refer to the "Contacting Us" section below.

#### Your rights in relation to your personal information

You have the right to request a copy of your personal data, and to have incorrect personal data about you corrected. You also have the right to withdraw your consent for the processing of your personal data, have your personal data erased, or the processing restricted. Please note that

withdrawing consent and requests for restriction/erasure may affect our ability to provide you with a contract of insurance. Some of the above rights are subject to limitations in order for us to comply with a number of legal and regulatory obligations. You have the right to data portability for insurance purposes (contact [dataprotectionofficer@allianz.ie](mailto:dataprotectionofficer@allianz.ie)). You also have the right to lodge a complaint with the Data Protection Commissioner. For further information, please see the section "Contacting Us" below.

### **Automated decision making**

As part of the provision of your insurance contract, including at quotation stage, Allianz may use automated decision-making. This means that we may use an automated underwriting model which uses your personal data to evaluate, analyse or predict the performance of your contract of insurance. Premiums are calculated according to the risk of loss, with the risk ascertained on the basis of profiling by way of a pricing tool and system. This avoids unfair discrimination. Certain motor policies also use Telematics (Allianz Safe Driver App) where driving behaviour is used to measure driving performance and to determine the nature and level of the risk associated with your insurance policy. In these cases, suitable safeguards are in place and you have the right to human intervention to express your interests and contest automated decisions. If you are making a claim, we may use profiling and other forms of automated processing to assess if your claim may be fraudulent and we may use your sensitive information, to carry out this assessment. For example, we may use your unspent motoring convictions for motoring insurance. We use automated decision making as it is necessary for entering into, or performance of your insurance policy between you as the data subject and Allianz as data controller, and other uses such as those authorised by law.

In the event that profiling determines you have a high risk profile, we may not be able to offer you an insurance policy. If you wish to review an automated decision with Allianz, please contact us on [dataprotectionofficer@allianz.ie](mailto:dataprotectionofficer@allianz.ie).

### **Up to date information**

In order for us to keep your information accurate and up to date, please contact Allianz or your insurance intermediary (where applicable) if any of your details change. For contact details, please see "Contacting Us" below.

### **Direct Marketing**

If your chosen preference is to receive marketing, we may contact you by email, SMS, phone or post to send you Allianz plc branded/co-branded information on special offers, competitions, vouchers and products.

**Cross Sell:** Our agents may reach out to you via email, SMS, phone or post for cross selling purposes if you have provided consent for the same via phone or through our website.

**Follow up on a quote:** Our agents may reach out to you to follow up on a quote you have requested via email, SMS, phone, post or through our website if you have provided consent for the same.

**Consent Preference Update:** To opt-out of receiving communication related to direct marketing activities please contact us via phone, email or post.

If you no longer wish your information to be used for marketing purposes, cross sell or to follow up on a quote please write to us at Allianz Plc, Allianz House, Elmpark, Merrion Road, Dublin 4, D04 Y6Y6 or e-mail us at [info@allianz.ie](mailto:info@allianz.ie).  
Call us at **+353 01-4484848**

### **Contacting Us**

If you have any questions about how we use personal information, or if you want to exercise your rights stated above, please contact our Data Protection Officer by either emailing, [DataProtectionOfficer@allianz.ie](mailto:DataProtectionOfficer@allianz.ie) or please write to The Data Protection Officer, Allianz plc, Allianz House, Elmpark, Merrion Road, Dublin 4, D04 Y6Y6, Ireland.

### **Complaints**

If you have a complaint or concern about how we use your personal information, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have the right to lodge a complaint with the Office of the Data Protection Commissioner at any time. The details of the Data Protection Commission are as follows:

Data Protection Commission  
21 Fitzwilliam Square S,  
Dublin 2  
D02 RD28

Telephone: +353 (0)761 104 800 or +353 (0)57 868 4800  
Local Number: 1890 252 231  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
Fax: +353 57 868 4757

This statement was last updated on May 2021

**We may amend this Statement from time to time, in whole or in part, at our discretion. The latest version of this document will always be available at [www.allianz.ie](http://www.allianz.ie) and will take effect on the date that it is updated. Please review this Data Protection Statement periodically to ensure you remain informed.**

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