

CLP Privacy Policy - Ireland

AXA Partners - Credit & Lifestyle Protection Privacy Policy

Protecting your privacy is very important to us. We value your trust and have designed this Privacy Policy to help you understand how we collect, protect, and use your Personal Information. By 'Personal Information' we mean information that identifies and relates to you. The specific AXA company acting as the Data Controller of your Personal Information will depend on your relationship with us. This will be detailed in the documentation that we send to you such as your policy terms and conditions. Alternatively, you can contact our data protection officer at clp.ie.dataprivacy@partners.axa or by calling 061 73 73 73 to find out the identity of the Data Controller. Any such company will treat your Personal Information in accordance with the terms of this Privacy Policy.

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and reinsurers. The Code of Practice on Data Protection for the Insurance Sector sets out the obligations of insurers operating in Ireland in respect of the use and processing of Personal Information. We recommend you review this notice which can be accessed [here](#).

Who do we collect personal information about

- Prospective and existing policyholders and beneficiaries
- Third parties or individuals who will act on behalf of a policyholder such as a power of attorney, solicitor or family member
- Third party claimants
- Witnesses
- Users of our claims portal
- Visitors to our website
- Individuals with whom we do business such as brokers and third party suppliers

How we collect your Personal Information

We collect your Personal Information from:

- you (e.g. via your application or claim form, correspondence with us including telephone calls (please note that telephone calls are recorded) and emails and via your use of our claims portal);
- third parties such as witnesses and medical professionals;
- the policyholder (where you are a third party such as a beneficiary);
- our marketing activities such as market research;
- financial crime and fraud detection agencies and third parties we use to carry out credit checks;
- other companies in the AXA Group;

- other third parties involved in your insurance policy or claim such as brokers, claims handlers, investigators, loss adjusters;
- insurance industry bodies;
- publically available sources (for example, searches using google, public registers and social media);
- third parties who brand and sell our insurance policies;
- any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of our business; and
- your use of our website (e.g. our web servers collect the name of the domain you used to access the internet, such as "aol.com" or "yahoo.com," and the website you came from and visit next).

Cookies

We also collect information via cookies which are small pieces of data stored by your internet browser on your computer's hard drive. We use cookies to ensure that you can benefit from and use the online claims portal systems if so requested by you. You may be able to set your browser to notify you when you receive a cookie or to prevent cookies from being sent. Please note, however, that, by not accepting cookies, you may limit the functionality we can provide to you when you visit our website. You can access our cookies policy at <https://en.clp.partners.axa/cookie-policy>

Types of Personal Information that we collect

Depending on your relationship with us, Personal Information that we collect may include:

- General identification and contact information such as your name, address and other contact details and date of birth;
- ID documents such as passport/driving licence;
- Any information relevant to your insurance policy such as lifestyle, income and employment status;
- Job information where it relates to a claim made on a policy, for example where the policyholder can't make repayments due to unemployment;
- Information relevant to any claims made;
- Details about family such as dependents or spouses;
- Information which is available publically;
- Financial information such as your bank account details and credit history;
- Your marketing preferences as you advise us; and/or
- Information enabling us to provide you with products and services such as details about previous insurance policies you have held and any previous claims you have made.

If relevant, we will also collect "special category data" which is Personal Information relating to health, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, and trade union membership. For example:

- Medical information such as your current health status, the details of any injuries or disabilities and medical history because it is relevant to your insurance policy or claims, for

example if you take out Cancer Protection, we will collect information about your health status and illness.

- Your religious beliefs where you disclose it to us (for example if it relates to any medical treatment you are having).

We may also collect criminal convictions data where we carry out anti money laundering and fraud checks.

Children's data

We do not intentionally offer insurance policies or collect any personal information from children under 18 years of age. However, some information about children may be collected and used in connection with a policy claim, for example where relevant to the circumstances of the claim and associated vulnerabilities.

How and why we use your Personal Information

We use your Personal Information to:

- Assess and process your insurance application;
- Administer a policy;
- Process any claims you may make;
- Send you information regarding your policy;
- Provide improved quality, training and security;
- Carry out market research;
- Provide marketing information to you (including information about products and services offered by selected third parties) in accordance with your marketing preferences;
- Comply with applicable laws and regulatory obligations;
- Establish and defend legal rights;
- Prevent, detect and investigate crime, including fraud;
- To carry out fraud, credit and anti-money laundering checks;
- To conduct sanction checks;
- To take out our own insurance;
- For business purposes such as management information, internal audit, reviewing products, systems development, accounting records, responding to enquiries, maintaining records of communications, enforcing compliance with our terms and providing quality training and security
- To handle complaints.

We collect, use and disclose your Personal Information for the purposes set out above. For each purpose, we must have a legal ground to use your Personal Information.

When we process your Personal Information we will rely on the following legal grounds:

- Such use is necessary to enter into or perform your contract of insurance. We rely on this legal ground in order to assess and process your application, administer a policy, handle claims and provide insurance services.
- We have a legitimate interest which is not overridden by your rights or interests. We rely on this legal ground to manage our business; where you are a named party under a policy - to assess and process the application, administer the policy and handle claims and provide insurance services; respond to enquiries; maintain records of communications; enforce compliance with our terms; and to provide marketing information to you.
- Such use is necessary to comply with our legal obligations. We rely on this legal ground to prevent, detect and investigate crime, including fraud and to comply with applicable laws and regulatory obligations (for example where our regulator or law enforcement authorities require us to do something such as keeping records of our dealings with you and to conduct sanctions checking).
- We have obtained your consent. We rely on this legal ground for direct marketing communications.

When we process your 'special category data' we must have an additional legal ground. We will rely on the following legal grounds:

- In the case of special category data relating to your health, where such processing is necessary for an insurance purpose. We rely on this legal ground for processing health data in order to advise and arrange your contract of insurance, assess and process your insurance application, administer your policy and handle claims under an insurance policy.
- We have your explicit consent. We rely on this legal ground in order to advise and arrange your contract of insurance, assess and process your insurance application, administer your policy and handle claims under an insurance policy.
- We need to establish, exercise or defend our legal rights. We rely on this legal ground in order to handle complaints, to prevent, detect and investigate crime, including fraud or to comply with applicable laws and regulatory obligations.

Purpose	Legal ground	Additional legal ground for special category data
To assess and process your insurance application	<ul style="list-style-type: none"> • It is necessary for performance of your contract of insurance. • It is in our legitimate interests (to provide appropriate insurance cover). 	<ul style="list-style-type: none"> • In the case of health data, processing is necessary for an insurance purpose of advising and arranging your contract of insurance. • We have your explicit consent.
To administer a policy, handle claims and provide relevant services.	<ul style="list-style-type: none"> • It is necessary for performance of your contract of insurance. • It is in our legitimate interests (to provide 	<ul style="list-style-type: none"> • In the case of health data, processing is necessary for an insurance purpose of advising and arranging your

	appropriate insurance cover).	contract of insurance and administering claims. <ul style="list-style-type: none"> We have your explicit consent
For business purposes such as responding to enquiries, maintaining records of communications, enforce compliance with our terms and providing improved quality, training and security.	<ul style="list-style-type: none"> It is necessary for performance of your contract of insurance. It is in our legitimate interests (to undertake these activities in order to manage our business). 	
Handling complaints	<ul style="list-style-type: none"> It is necessary for performance of your contract of insurance. It is in our legitimate interests (to respond and handle all complaints). 	<ul style="list-style-type: none"> We need to establish, exercise or defend our legal rights.
To carry out market research	<ul style="list-style-type: none"> It is in our legitimate interests to carry out market research in order to improve our products and services. 	
To provide marketing information to you (including information about products and services offered by selected third parties) in accordance with your marketing preferences.	<ul style="list-style-type: none"> We have your consent. It is in our legitimate interests (to market our services where you have expressed an interest in receiving such information). 	
To prevent, detect and investigate crime, including fraud and money laundering and to carry out sanctions checks.	<ul style="list-style-type: none"> It is necessary for performance of your contract of insurance. It is in our legitimate interests to prevent any crime and fraud. To comply with a legal obligation. 	<ul style="list-style-type: none"> In the case of health data, processing is necessary for an insurance purpose of advising and arranging your contract of insurance and administering claims. We have your explicit consent. We need to establish, exercise or defend our legal rights.
To comply with applicable laws and regulatory obligation for example where our regulator or law enforcement authorities require us to do something or	<ul style="list-style-type: none"> To comply with a legal obligation 	<ul style="list-style-type: none"> We need to establish, exercise or defend our legal rights.

to keep records of our dealings with you		
To take out our own insurance	<ul style="list-style-type: none"> • It is in our legitimate interests (to ensure that we have appropriate insurance in place). 	<ul style="list-style-type: none"> • We have your explicit consent. • We need to establish, exercise or defend our legal rights.

We will not share your Personal Information with any third parties for any purpose other than those described above. For example, we will not sell Personal Information to third parties that may wish to market their products and services to you.

Sharing your Personal Information

We may disclose Personal Information we collect to other organisations as detailed below. The organisations to whom we disclose Personal Information are obligated to use such information only for the purposes stated above. Disclosures may be made to the following third parties:

- The company who underwrites your insurance policy.
- Other third parties involved in the administration of a policy such as brokers.
- Third parties who brand and sell our insurance policies.
- The company who provides us with our own insurance policy.
- Third party administrators who we use to assist with the administration of a claim such as claims handlers, loss adjustors and independent medical advisers.
- Third parties who provide sanctions checking services, anti-fraud and credit checks.
- Financial crime and fraud detection agencies.
- Service Providers such as legal advisers, fraud investigators, (An Garda Síochana and various Government agencies) and distributors of our products. In all cases, we will require service providers to whom we provide Personal Information to comply with our Privacy Policy and to use the information solely for the purposes for which we have retained them. Disclosure of Personal Information to these service providers is done to help us better serve you.
- Our group companies.
- Other insurers, regulators and industry/public bodies.
- Any third parties in the event of a sale, merger, reorganisation, transfer or dissolution of the business.

Disclosure of your Personal Information to the parties listed above, may involve the transfer of such information to other countries, including those outside of the EEA (see section “International transfers of Personal Information” below).

Security of collected information

We maintain strict physical, electronic, and administrative safeguards in accordance with applicable standards to protect your Personal Information from unauthorized or inappropriate access and prevent the loss or misuse of your Personal Information. We restrict access to Personal Information to employees and service providers who need to know the information for the purposes set out in this Privacy Policy.

We use encryption and authentication tools to protect information we gather on our website. E-mail communications outside of our website, however, may not be protected. If you are sending us an e-mail communication that includes highly confidential information, such as a credit card number, you may want to call us or send it by registered post.

We have deployed an adequate procedure to identify and communicate any incident of data breach within 72 hours and to resolve it within a reasonable period of time.

Retention of Personal Information

Your Personal Information shall be retained as long as needed for the purposes specified in this Privacy Policy and will depend on your relationship with us and the type of Personal Information we hold about you. In certain circumstances we will need to retain some Personal Information following the end of our relationship with you, especially in order to resolve any potential disputes and for ongoing or prospective legal proceedings, to maintain records of our services, or to otherwise comply with our legal obligations and defend our legal rights. For example:

- We will hold your policy and account files for 7.5 years from the date on which your policy ends or when a claim is settled whichever is later;
- Where an insurance quote has not been taken up, we will hold quote and related Personal Information for 15 months.

We undertake to keep your Personal Information safe, confidential, accurate and efficient for the relevant usage duration period. At the end of the retention period, your Personal Information will be anonymized or destroyed.

Your marketing preferences

We sometimes use or share your Personal Information in ways that will improve or expand upon the services we provide to you. You can choose to opt-out of this at any time by contacting us at clp.ie.dataprivacy@partners.axa or by calling 061 73 73 73.

We also provide you with regular opportunities to opt-out.

- Emails: If you no longer want to receive marketing emails, you may opt-out by clicking on the unsubscribe link provided in each email or by contacting us as set out above.
- Text messages/telephone communications/postal mail: You may opt-out by contacting us as set out above.

Even if you opt-out of marketing communications, we will still provide you with important administrative communications.

International transfers of Personal Information

Due to the global nature of our business, we may need to transfer Personal Information to our group companies or third parties located in other countries for the purposes set out in this Privacy Policy. In such a case, we will ensure your Personal Information is given a similar level of protection as required under Irish data protection laws and we will ensure that we take adequate steps to ensure that your Personal Information is protected such as:

- entering into contractual obligations with the party we are transferring your Personal Information to;
- transferring to countries which have been deemed 'adequate' by data protection authorities; or
- complying with 'binding corporate rules' which are a set of rules approved by the relevant data protection authorities which allow AXA group companies to transfer Personal Information between themselves.

Third party websites

We are not responsible for the content, security or information collection practices of any third party websites, including those that you link to from our website. You should carefully review the privacy policies of each web site you visit to understand how they collect, use, and disclose information.

Your legal rights

In accordance with data protection laws, you have a right to:

- Obtain a copy of the Personal Information we hold about you, together with other information about how we process it;
- Request rectification of inaccurate or incomplete Personal Information, and, in some circumstances, to request us to erase or restrict our use of it, or otherwise to object to our processing of your Personal Information for direct marketing purposes;
- Receive a copy or have a copy transmitted to another company (portability of data) (in a machine-readable format) of Personal Information which you have provided to us;
- Make a complaint about how we handle your data to the Office of the Data Protection Commissioner. Please visit <http://www.dataprotection.ie> for further information about how to do this.
- Withdraw any consent which you have given relating to use of your Personal Information, at any time. This includes consents to receiving direct marketing communications.
- We do not carry out any automated decision-making but if we decide to do so in the future, we will let you know and provide you with an updated privacy policy.

Note that there are certain limitations and exemptions to these rights which we may apply depending on the circumstances.

To exercise any of these rights, please contact us using the details set out in the 'contacting us' section.

Contacting Us

If you have any questions about this Privacy Policy or you want to exercise your rights regarding data protection:

Data Protection Officer

Email: clp.ie.dataprivacy@partners.axa

Phone number: 061 73 73 73

Changes to this Policy

Please check this Privacy Policy periodically to inform yourself of any changes. Although we reserve the right to modify or supplement this Privacy Policy, we will provide notice to you on this website of any major changes for at least 30 days following the change.

Last updated: 9 May 2018