

# Lockton Insurance Brokers (Ireland) Limited Privacy Notice For Clients – Insurance Mediation Services

**Last updated:** 22<sup>nd</sup> October 2021



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# Lockton Insurance Brokers (Ireland) Limited

## Privacy Notice

Last updated: 22<sup>nd</sup> October 2021

### What is the purpose of this document?

Lockton Insurance Brokers (Ireland) Limited is committed to protecting the privacy and security of **your personal data**.

This notice describes how **we**, as an **intermediary**, collect and use **personal data** about **you** during and after **your** engagement with **us**, in accordance with the Data Protection Laws. In particular this notice is designed to help **you** understand how **we** process **your personal data** through the **insurance lifecycle**. **Insurance** is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including **your personal data**, needs to be shared between different **insurance market participants**. The insurance market is committed to safeguarding that information.

For information on how Lockton collects and **processes your personal data** through **your** use of this website, including any data **you** may provide through this website, for example when **you** sign up to our newsletter or fill in our contact us form, please see the **Privacy Notice** accessible at the footer of this website. In particular, the Privacy Notice accessible at the footer of this website, together with the **Terms of Use** and **Cookies Notice** (also accessible at the footer of this website) set out how **we** look after **your personal data** when **you** visit **our** website (regardless of where **you** visit it from) and tells **you** about **your** privacy rights and how the law protects **you**.

It is important that **you** read this notice, together with any other privacy notice **we** may provide on specific occasions when **we** are collecting or **processing personal data** about **you**, so that **you** are aware of how and why **we** are using such information. This privacy notice supplements the other notices and is not intended to override them.

### Third Party Information Notice - Insurance Market Core Uses Information Notice

**Insurance** involves the use and disclosure of **your personal data** by various **insurance market participants** such as **intermediaries, insurers and reinsurers**. The London Insurance Market has produced a Core Uses

Information Notice (**LMA Notice**) which sets out those core necessary personal data uses and disclosures throughout the **insurance lifecycle**, and in particular sets out how other **insurance market participants process your personal data**. Our core uses and disclosures are consistent with the LMA Notice. Although this is a notice produced by the London Insurance Market it provides useful information about the use of data in the insurance lifecycle and as such, in addition to reviewing **our** information notice, **we** recommend **you** review the LMA Notice. As at the time of publishing the LMA Notice can be found on the LMA website ([www.lmalloyds.com](http://www.lmalloyds.com)) at:

[http://lma.informz.ca/LMA/data/images/Bulletin%20att/LMA17\\_038\\_MS\\_att1\\_information\\_notice.pdf](http://lma.informz.ca/LMA/data/images/Bulletin%20att/LMA17_038_MS_att1_information_notice.pdf)

Please note that we do not control the LMA website and are not responsible for the LMA Notice.

### Controller

Lockton Insurance Brokers (Ireland) Limited is a “**data controller**”. This means that **we** are responsible for deciding how **we** hold and use **personal data** about **you**. **We** are required under the Data Protection Laws to notify **you** of the information contained in this privacy notice.

### Our Data Protection Manager

**We** have appointed a **data protection manager** to oversee compliance with and questions in relation to this privacy notice.

If **you** have any questions about this privacy notice, including any requests to exercise **your** legal rights, please contact **our Data Protection Manager** using the details set out below:

### Contact Details

#### Data Protection Manager

Lockton Insurance Brokers (Ireland) Limited  
Millennium House  
55 Great Strand Street  
Dublin 1

**Email:** [dataprotection@ie.lockton.com](mailto:dataprotection@ie.lockton.com)



## Changes to this privacy notice and your duty to inform us of changes

This notice may be updated from time to time. We encourage you to review this notice regularly when you visit our website to learn more about how we are using your **personal data** and safeguarding your privacy.

This version is dated 22<sup>nd</sup> October and historic versions can be obtained by contacting our **Data Protection Manager**.

It is important that the **personal data we** hold about **you** is accurate and current. Please keep **us** informed if **your personal data** changes during **your** relationship with **us**.

### Defined Terms

In this notice:

- **we, us or our** refers to Lockton Insurance Brokers (Ireland) Limited, a private company limited by shares with company number 594973 and its registered office at Hambleden House, 19-26 Pembroke Street Lower, Dublin 2, DO2 WV96, Ireland, an insurance intermediary regulated by the Central Bank of Ireland.
- **you or your**, refers to the individual whose **personal data** may be processed by **us** and other **insurance market participants** (**you** may be a potential or actual policyholder, the **insured, beneficiary** under a policy, their family member, **claimant** or other person involved in a claim or relevant to a policy).

There are other terms in **bold** with specific meanings. Those meanings can be found in [Section 11: Glossary of Key Terms](#).

## Contents of this privacy notice:

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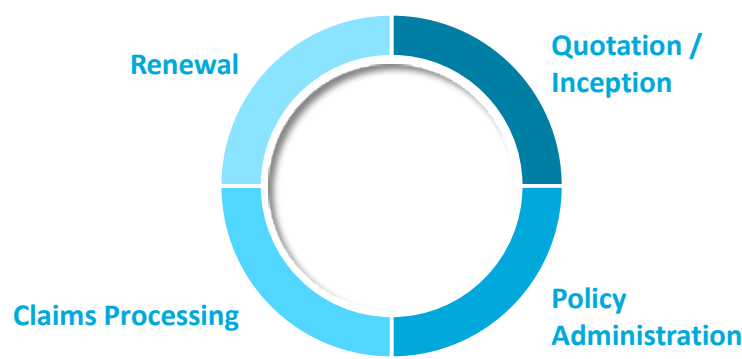
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# Section 1: Introduction – How the insurance market works

## INSURANCE LIFECYCLE:



## FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE:

Stage of Insurance Lifecycle	You	Who has access to your Personal Data			
Quotation/ Inception	Policyholder/ Insured Beneficiary	Intermediary	Insurer	Intermediary	Reinsurer
Policy Administration	Claimant				
Claims Processing					
Renewal	Policyholder/ Insured Beneficiary				

## Section 2: The data we may collect about you (Your Personal Data)

In order for **us** to obtain insurance quotes, place and administer insurance policies, and/or deal with any claims or complaints, **we** need to collect and process **personal data** about **you**.

The types of **personal data** that are **processed** may include:

Types of Personal Data	Details
Individual details ►	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to <b>you</b>
Identification details ►	Identification numbers issued by government bodies or agencies, including <b>your</b> national insurance number, passport number, tax identification number and driving licence number
Financial information ►	Bank account or payment card details, income or other financial information
Risk details ►	Information about <b>you</b> which <b>we</b> need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to <b>your</b> health, criminal convictions, or other <b>special categories of personal data</b> . For certain types of policy, this could also include <b>telematics data</b>
Policy information ►	Information about the quotes <b>you</b> receive and policies <b>you</b> take out
Credit and anti-fraud data ►	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies relating to <b>you</b>
Previous and current claims ►	Information about previous and current claims, (including other unrelated <b>insurances</b> ), which may include data relating to <b>your</b> health, criminal convictions, or other <b>special categories of personal data</b> and in some cases, surveillance reports
Special categories of personal data ►	Certain categories of <b>personal data</b> which have additional protection under the <b>GDPR</b> . The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation
Marketing and communications data ►	Your preference in receiving marketing from us and third parties and your communication preferences

**Personal data** does not include data where the identity has been removed (anonymous data).

**We** also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from **your personal data** but is not considered **personal data** in law as this data does **not** directly or indirectly reveal **your** identity. However, if **we** combine or connect aggregated data with **your personal data** so that it can directly or indirectly identify **you**, **we** treat the combined data as **personal data** which will be used in accordance with this privacy notice.

### If you fail to provide personal data

Where **we** need to collect **personal data** by law, or under the terms of a contract **we** have with **you** and **you** fail to provide that data when requested, **we** may not be able to perform the contract **we** have or are trying to enter into with **you** (for example, to provide you with insurance broking services). In this case, **we** may have to cancel a service **you** have with **us** but **we** will notify **you** if this is the case at the time.

## Section 3: Where we might collect your personal data from

We might collect **your personal data** from various sources, including:

- **you** (for example by filling in forms or by corresponding with **us** by post, phone, email or otherwise. This includes personal data you provide when you:
  - make enquiries about or request our services;
  - subscribe to receive our newsletters or publications;
  - request marketing to be sent to you;
  - give us some feedback);
- **your** family members, employer (including trade or professional associations of which you are a member) or representative;
- other **insurance market participants**;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as the Motor Tax Office, Revenue Commissioners and Companies Registration Office;
- publicly available sources such as the open electoral register and Companies Registration Office;
- claims forms;
- third parties who introduce business to us; or
- in the event of a claim, third parties including the other party to the claim (**claimant**/defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers.

Which of the above sources apply will depend on **your** particular circumstances.

For example, **we** might collect **your personal data** where:

- **you** have taken out an **insurance policy** through **us** (**you** are the **policyholder**), in which case **we** might collect **your personal data** from **you**, credit reference agencies, anti-fraud databases, sanctions lists etc;
- a third party (such as a family member or your employer) has taken out an **insurance policy** through **us** for **your** benefit (**you** are an **insured** or **beneficiary**), in which case **we** might collect **your personal data** from **your** family member, employer etc;
- **you** are a **claimant** or other person involved in a claim or relevant to a policy. E.g. **you** are making a claim against an **insurance policy** **you** have taken out through **us** or that a third party has taken out through **us** for **your** benefit, or **you** are making a claim against a third party's **insurance policy** that was taken out through **us**, or a third party is making a claim against an **insurance policy** **you** have taken out through **us**, in which case **we** might collect **your personal data** from **you**, other **insurance market participants**, witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers etc.



## Section 4: The purposes, categories, legal grounds and recipients, of our processing of your personal data

We set out below the purposes for which we might use your personal data:

### Purposes

Relationship Management ►	<ul style="list-style-type: none"><li>- To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering into a contract</li></ul>
Quotation / Inception ►	<ul style="list-style-type: none"><li>- Setting <b>you</b> up as a client, including possible fraud, sanctions, credit and anti-money laundering checks</li><li>- Evaluating the risks to be covered and matching to appropriate insurer/policy/<b>premium</b></li><li>- Payment of <b>premium</b> where the <b>insured/policyholder</b> is an individual</li></ul>
Policy Administration ►	<ul style="list-style-type: none"><li>- Client care, including communicating with <b>you</b> and sending <b>you</b> updates</li><li>- Payments to and from individuals</li></ul>
Claims Processing ►	<ul style="list-style-type: none"><li>- Managing insurance and reinsurance claims</li><li>- Defending or prosecuting legal claims</li><li>- Investigation or prosecuting fraud</li></ul>
Renewals ►	<ul style="list-style-type: none"><li>- Contacting the <b>insured/policyholder</b> to renew the <b>insurance policy</b></li><li>- Evaluating the risks to be covered and matching to appropriate insurer/policy/<b>premium</b></li><li>- Payment of <b>premium</b> where the <b>insured/policyholder</b> is an individual</li></ul>
Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period ►	<ul style="list-style-type: none"><li>- Complying with <b>our</b> legal and regulatory obligations</li><li>- General risk modelling</li><li>- Transferring books of business, company sales and reorganisations</li></ul>
Consultancy Services ►	<ul style="list-style-type: none"><li>- Setting <b>you</b> up as a client, including possible fraud, sanctions, credit and anti-money laundering checks</li><li>- Client care, including communicating with <b>you</b> and sending <b>you</b> updates</li><li>- Payments to and from individuals</li><li>- General risk modelling</li><li>- Analysis as part of the specific consultancy advice</li><li>- Transferring books of business, company sales and reorganisations</li><li>- Complying with <b>our</b> legal and regulatory obligations</li></ul>
Marketing ►	<ul style="list-style-type: none"><li>- To make suggestions and recommendations to you about products or services that may be of interest to you, to provide industry insight or to invite you to events</li><li>- To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you</li></ul>

Please note that in addition to the disclosures **we** have identified against each purpose, **we** may also disclose **personal data** for those purposes to **our** service providers, contractors, agents and group companies that perform activities on **our** behalf.

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### Marketing communications from us

**We** may use **your Individual Details and Policy Information** to form a view on what **we** think **you** may want or need, or what may be of interest to **you**. This is how **we** decide which products, services, events and industry insight may be relevant for **you**.

**You** will receive marketing communications from **us** if **you** have requested information from **us** (including for example where you have provided your explicit consent by way of opting-in to receiving our marketing communications in accordance with applicable law) or purchased services from **us**, or (where you are a corporate entity) where we consider the marketing material to be relevant to you and, in each case, **you** have not opted out of receiving that marketing. Such marketing communications may include risk or insurance related information or details of services, or products, or events, which **we** think, may be of interest to **you**.

### Third party marketing

**We** will get **your** express opt-in consent before **we** share **your** personal data with any company outside the Lockton group of companies for marketing purposes.

We may share your personal data with other companies in the Lockton group of companies, if allowed and appropriate, for marketing purposes.

### Managing your Marketing Preference (including Opting out)

**You** can manage your marketing preferences or ask **us** or third parties to stop sending **you** marketing messages at any time by following the opt-out links on any marketing message sent to **you** or by contacting our Data Protection Manager at any time.

Where **you** opt out of receiving these marketing messages, this will not apply to personal data provided to **us** as a result of a product/service purchase, product/service experience or other transactions, and will not affect communications relating to any such matters on which we are advising you.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies this website uses, please see the [Cookies Notice](#) accessible at the footer of this website.

## CHANGE OF PURPOSE

**We** will only use **your personal data** for the purposes for which **we** collected it, unless we reasonably consider that **we** need to use it for another reason and that reason is compatible with the original purpose. If **you** wish to get an explanation as to how the **processing** for the new purpose is compatible with the original purpose, please contact our Data Protection Manager.

If **we** need to use **your personal data** for an unrelated purpose, **we** will notify **you** and **we** will explain the legal basis which allows **us** to do so.

**Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.**

## LEGAL GROUNDS FOR PROCESSING

We will only use **your personal data** when the law allows us to. In particular, **we** will rely on the following legal grounds to use **your personal data**:

For processing personal data	
Legal ground	Details
Your explicit consent (optional)	<p><b>You</b> have given <b>your</b> explicit consent to the <b>processing</b> of those <b>personal data</b> for one or more specified purposes.</p> <p><b>You</b> are free to withdraw <b>your</b> consent, by contacting <b>our Data Protection Manager</b></p>
Performance of <b>our</b> contract with <b>you</b>	Processing is necessary for the performance of a contract to which <b>you</b> are party or in order to take steps at <b>your</b> request prior to entering into a contract
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which <b>we</b> are subject
In the public interest	Processing is necessary for the performance of a task carried out in the public interest
For <b>our</b> legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by <b>us</b> or by a third party, except where such interests are overridden by <b>your</b> interests or fundamental rights and freedoms which require protection of <b>personal data</b> , in particular where <b>you</b> are a child. These legitimate interests are set out next to each purpose below
For processing special categories of personal data	
Legal ground	Details
Your explicit consent (optional)	<p><b>You</b> have given <b>your</b> explicit consent to the <b>processing</b> of those <b>personal data</b> for one or more specified purposes.</p> <p><b>You</b> are free to withdraw <b>your</b> consent, by contacting <b>our Data Protection Manager</b></p>
Your explicit consent (necessary)	<p><b>You</b> have given <b>your</b> explicit consent to the <b>processing</b> of those <b>personal data</b> for one or more specified purposes, where <b>we</b> are unable to procure, provide or administer insurance cover without this consent.</p> <p><b>You</b> are free to withdraw <b>your</b> consent by contacting <b>our Data Protection Manager</b>. However withdrawal of this consent will impact <b>our</b> ability to place or administer insurance or assist with the payment of claims. For more detail see Section 5: Consent</p>
For legal claims	<b>Processing</b> is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
In the substantial public interest	<b>Processing</b> is necessary for reasons of substantial public interest, on the basis of EU or UK law

## DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the Purposes set out in the table above.

- Internal third parties: other companies in the Lockton Group (which means our subsidiaries and ultimate holding company and its subsidiaries) who provide IT and system administration services and undertake leadership reporting
- External third parties:
  - Service providers who provide IT and system administration services;
  - Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
  - Credit reference agencies;
  - Anti-fraud and sanctions database providers;
  - Other insurance market participants such as intermediaries, insurers and reinsurers;
  - Banks;
  - Claims handlers;
  - Solicitors;
  - Auditors;
  - Loss adjusters;
  - Experts;
  - Third parties involved in claims/investigations/prosecutions;
  - Private investigators;
  - Police;
  - Courts;
  - Central Bank of Ireland, DPC and other regulators;
  - Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

## THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways **we** plan to use **your personal data**, including the categories of **personal data** and which of the legal bases **we** rely on to do so. **We** have also identified what **our** legitimate interests are where appropriate, and the third parties with whom **we** need to share **your personal data**.

Note that **we** may **process your personal data** for more than one lawful ground depending on the specific purpose for which **we** are using **your personal data**. Please contact **our Data Protection Manager** if **you** need details about the specific legal ground **we** are relying on to **process your personal data** where more than one ground has been set out in the table below.

Purpose	Categories of Data	Legal Grounds	Disclosures
<b>RELATIONSHIP MANAGEMENT</b>  To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering into a contract	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Marketing and Communications Data</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- Compliance with a legal obligation</li> <li>- For <b>our</b> legitimate business interests (to correspond with <b>you</b>)</li> </ul>	
<b>QUOTATION/INCEPTION</b>  <b>Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Financial information</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Credit and anti-fraud data</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- Compliance with a legal obligation</li> <li>- For <b>our</b> legitimate business interests (to ensure that the client is within our acceptable risk profile)</li> <li>- To assist with the prevention of crime and fraud</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- In the substantial public interest</li> <li>- Consent</li> </ul>	<ul style="list-style-type: none"> <li>- Credit reference agencies</li> <li>- Anti-fraud and sanctions databases</li> </ul>
<b>QUOTATION/INCEPTION</b>  <b>Evaluating the risks to be covered and matching to appropriate insurer/policy/premium</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Policy information</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Risk details</li> <li>- Previous claims</li> <li>- Credit and anti-fraud checks</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to determine the likely risk profile and appropriate <b>insurer</b> and insurance product)</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> </ul>	<ul style="list-style-type: none"> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers</b> and <b>reinsurers</b></li> </ul>
<b>QUOTATION/INCEPTION and POLICY ADMINISTRATION</b>  <b>Payments to and from individuals, including collection or refunding of premiums, paying on claims, and processing other payments</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Financial information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to recover debts due to us, and ensuring our clients are able to meet their financial obligations)</li> </ul>	<ul style="list-style-type: none"> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers</b> and <b>reinsurers</b></li> <li>- Banks</li> </ul>



Purpose	Categories of Data	Legal Grounds	Disclosures
<b>POLICY ADMINISTRATION</b>  General client care, including communication with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy. Notifying you about changes to our terms or privacy notice	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Policy information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to correspond with clients, <b>beneficiaries</b> and <b>claimants</b> in order to facilitate the placing of and claims under insurance policies)</li> <li>- Compliance with a legal obligation</li> <li>- Consent</li> </ul>	<ul style="list-style-type: none"> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers</b> and <b>reinsurers</b></li> </ul>
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> <li>- Substantial public interest</li> </ul>	
<b>CLAIMS PROCESSING</b>  Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Financial information</li> <li>- Policy information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to assist <b>our</b> clients in assessing and making claims)</li> </ul>	<ul style="list-style-type: none"> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers</b> and <b>reinsurers</b></li> <li>- Claims handlers</li> <li>- Solicitors</li> <li>- Loss adjustors</li> <li>- Experts</li> <li>- Third parties involved in the claim (such as health care professionals)</li> </ul>
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Credit and anti-fraud data</li> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> <li>- For legal claims</li> <li>- Substantial public interest</li> </ul>	
<b>CLAIMS PROCESSING</b>  Defending or prosecuting legal claims	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Financial information</li> <li>- Policy information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to assist in assessing and making claims)</li> </ul>	<ul style="list-style-type: none"> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers</b> and <b>reinsurers</b></li> <li>- Claims handlers</li> <li>- Solicitors</li> <li>- Loss adjustors</li> <li>- Experts</li> <li>- Third parties involved in the claim (such as health care professionals)</li> </ul>
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Credit and anti-fraud data</li> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> <li>- For legal claims</li> </ul>	

Purpose	Categories of Data	Legal Grounds	Disclosures
<b>CLAIMS PROCESSING</b>  <b>Investigating and prosecuting fraud</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Financial information</li> <li>- Policy information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to assist with the prevention and detection of fraud)</li> </ul>	<ul style="list-style-type: none"> <li>- Solicitors</li> <li>- Private investigators</li> <li>- Police</li> <li>- Experts</li> <li>- Third parties involved in the investigation or prosecution</li> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers</b> and <b>reinsurers</b></li> <li>- Anti-fraud databases</li> </ul>
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Health data</li> <li>- Criminal records data</li> <li>- Other sensitive data</li> <li>- Credit and anti-fraud data</li> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> <li>- For legal claims</li> <li>- In the substantial public interest</li> </ul>	
<b>RENEWALS</b>  <b>Contacting you in order to renew the insurance policy</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Policy information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to correspond with clients, <b>beneficiaries</b> and <b>claimants</b> in order to facilitate the placing of and claims under insurance policies)</li> <li>- Consent</li> </ul>	<ul style="list-style-type: none"> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers</b> and <b>reinsurers</b></li> </ul>
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> </ul>	
<b>THROUGHOUT THE INSURANCE LIFECYCLE</b>  <b>Transferring books of business, company sales and reorganisations. To administer and protect our business</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Financial information</li> <li>- Policy information</li> <li>- Marketing and communications data</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- For <b>our</b> legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately)</li> <li>- Compliance with a legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>- Group companies</li> <li>- Courts</li> <li>- Purchaser (potential and actual)</li> </ul>
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Credit and anti-fraud data</li> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> <li>- In the substantial public interest</li> </ul>	

Purpose	Categories of Data	Legal Grounds	Disclosures
<b>THROUGHOUT THE INSURANCE LIFECYCLE</b>  <b>General risk modelling and underwriting</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Financial information</li> <li>- Policy information</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Credit and anti-fraud data</li> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- For <b>our</b> legitimate business interests (to build risk models that allow placing of risk with appropriate <b>insurers</b>)</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> </ul>	-
<b>THROUGHOUT THE INSURANCE LIFECYCLE</b>  <b>Complying with our legal or regulatory obligations</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Financial information</li> <li>- Policy information</li> <li>- Marketing and communications data</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Credit and anti-fraud data</li> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Compliance with a legal obligation</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> <li>- For legal claims</li> <li>- In the substantial public interest</li> </ul>	<ul style="list-style-type: none"> <li>- Central Bank of Ireland, DPC and other regulators</li> <li>- Police</li> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers</b> and <b>reinsurers</b> (under court order)</li> <li>- Insurance Fraud database</li> <li>- Auditors</li> </ul>
<b>CONSULTANCY SERVICES</b>  <b>Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Identification details</li> <li>- Financial information</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Credit and anti-fraud data</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- Compliance with a legal obligation</li> <li>- For <b>our</b> legitimate business interests (to ensure that the client is within our acceptable risk profile)</li> <li>- To assist with the prevention of crime and fraud</li> </ul> <b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- In the substantial public interest</li> <li>- Consent</li> </ul>	<ul style="list-style-type: none"> <li>- Credit reference agencies Anti-fraud and sanctions databases</li> </ul>

Purpose	Categories of Data	Legal Grounds	Disclosures
<b>CONSULTANCY SERVICES</b>  <b>Client care, including communicating with you and sending you updates</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Financial Information</li> <li>- Policy information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to correspond with clients in order to provide consultancy services)</li> <li>- Compliance with a legal obligation</li> <li>- Consent</li> </ul>	
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> </ul>	
<b>CONSULTANCY SERVICES</b>  <b>Payments to and from individuals</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Financial information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to recover debts due to us, and ensuring our clients are able to meet their financial obligations)</li> </ul>	<ul style="list-style-type: none"> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers and reinsurers</b></li> <li>- Banks</li> </ul>
<b>CONSULTANCY SERVICES</b>  <b>General risk modelling</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Financial information</li> <li>- Policy information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- For <b>our</b> legitimate business interests (to build risk models that allow placing of risk with appropriate <b>insurers</b>)</li> </ul>	
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> </ul>	
<b>CONSULTANCY SERVICES</b>  <b>Analysis as part of the specific consultancy advice</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Financial information</li> <li>- Policy information</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Performance of <b>our</b> contract with <b>you</b></li> <li>- For <b>our</b> legitimate business interests (to provide the consultancy services)</li> <li>- Compliance with a legal obligation</li> <li>- Consent</li> </ul>	
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> </ul>	

Purpose	Categories of Data	Legal Grounds	Disclosures
<b>CONSULTANCY SERVICES</b>  <b>Transferring books of business, company sales and reorganisations</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Financial information</li> <li>- Policy information</li> <li>- Marketing and communications data</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- For <b>our</b> legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately)</li> <li>- Compliance with a legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>- Group companies</li> <li>- Courts</li> <li>- Purchaser (potential and actual)</li> </ul>
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> <li>- In the substantial public interest</li> </ul>	
<b>CONSULTANCY SERVICES</b>  <b>Complying with our legal or regulatory obligations</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Financial information</li> <li>- Policy information</li> <li>- Marketing and communications data</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Compliance with a legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>- Central Bank of Ireland, DPC and other regulators</li> <li>- Police</li> <li>- Other <b>insurance market participants</b> such as <b>intermediaries, insurers and reinsurers</b> (under court order)</li> <li>- Auditors</li> </ul>
	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Risk details</li> <li>- Previous claims</li> <li>- Current claims</li> </ul>	<b>Special Categories of Personal Data:</b> <ul style="list-style-type: none"> <li>- Consent</li> <li>- For legal claims</li> <li>- In the substantial public interest</li> </ul>	
<b>MARKETING</b> <b>To make suggestions and recommendations to you about products, services or events that may be of interest to you and to provide industry insight</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual details</li> <li>- Policy information</li> <li>- Marketing and Communications Data</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- For our legitimate interests (to develop our products/services and grow our business)</li> <li>- Explicit consent (optional) (where required by law)</li> </ul>	
<b>MARKETING</b>  <b>To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you</b>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- Individual Details</li> <li>- Marketing and Communications Data</li> </ul>	<b>Personal Data:</b> <ul style="list-style-type: none"> <li>- For our legitimate business interests (to understand how customers use our products and services, to develop them and grow our business, and to inform our marketing strategy)</li> </ul>	



## Section 5: Consent

In order to arrange and provide insurance cover and deal with insurance claims in certain circumstances **we** and other **insurance market participants** may need to process **your special categories of personal data**, such as medical and criminal convictions records, as set out against the relevant purpose.

**Your consent to this processing may be necessary for us and the other insurance market participants to achieve this.**

**You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our, and the other insurance market participants', ability to place, administer and provide insurance or pay claims.**

## Section 6: Profiling and automated decision making

When calculating insurance **premiums** **insurance market participants** may compare your **personal data** against industry averages. **Your personal data** may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure **premiums** reflect risk.

Profiling may also be used by **insurance market participants** to assess information **you** provide to understand fraud patterns. Where **special categories of personal data** are relevant, such as medical history for life insurance or past motoring convictions for motor insurance, **your special categories of personal data** may also be used for profiling. **Insurance market participants** might make some decisions based on profiling and without staff intervention (known as automatic decision making). **Insurance market participants** will provide details of any automated decision making they undertake without staff intervention in their information notices and upon request including:

- where they use such automated decision making;
- the logic involved;
- the consequences of the automated decision making;
- any facility for **you** to have the logic explained to **you** and to submit further information so the decision may be reconsidered.

## Section 7: Data security

Unfortunately, the transmission of data over the internet or any website cannot be guaranteed to be completely secure from intrusion. However, **we** have put in place appropriate physical, electronic and procedural security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

**We** have put in place procedures to deal with any suspected **personal data** breach and will notify **you** and any applicable regulator of a breach where **we** are legally required to do so.

## *Section 8:* Retention of your personal data

We will keep **your personal data** only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either **you** or **we** may wish to bring a legal claim under or in relation to **your insurance**, or where **we** are required to keep **your personal data** due to legal, regulatory, accounting or reporting reasons.

To determine the appropriate retention period for **personal data**, we consider the amount, nature, and sensitivity of the **personal data**, the potential risk of harm from unauthorised disclosure of your **personal data**, the purposes for which we **process** your **personal data** and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your **personal data**: see **Section 10 (Your Rights and Contact Details of the DPC)** below.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## *Section 9:* International transfers

We may need to transfer **your** data to **insurance market participants** or other companies within the Lockton group or their respective affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the **GDPR**.

If **you** would like further details of how **your personal data** would be protected if transferred outside the EEA, please contact **our Data Protection Manager**.

## Section 10: Your rights and contact details of the DPC

If **you** have any questions about this privacy notice or in relation to **our** use of **your personal data**, **you** should first contact **our Data Protection Manager**. Under certain conditions, **you** may have the right to require us to:

- provide **you** with further details on the use **we** make of **your personal data/special category of data**;
- provide **you** with a copy of the **personal data** that **you** have provided to **us**;
- update any inaccuracies in the **personal data** **we** hold;
- delete any **special category of personal data/personal data** that **we** no longer have a lawful ground to use;
- where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing;
- object to any processing based on the legitimate interests ground unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights;
- object to direct marketing; and
- restrict how **we** use **your personal data** whilst a complaint is being investigated.

In certain circumstances, **we** may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and **our** interests (e.g. the maintenance of legal privilege).

If **you** wish to exercise any of the rights set out above, please contact **our** Data Protection Manager.

### No fee usually required

**You** will not have to pay a fee to access **your personal data** (or to exercise any of the other rights). However, **we** may charge a reasonable fee if **your** request is clearly unfounded, repetitive or excessive. Alternatively, **we** may refuse to comply with **your** request in these circumstances.

### What we may need from you

**We** may need to request specific information from **you** to help **us** confirm **your** identity and ensure **your** right to access **your personal data** (or to exercise any of **your** other rights). This is a security measure to ensure that **personal data** is not disclosed to any person who has no right to receive it. **We** may also contact **you** to ask **you** for further information in relation to **your** request to speed up **our** response.

### Time limit to respond

**We** try to respond to all legitimate requests within one month. Occasionally it may take **us** longer than a month if **your** request is particularly complex or **you** have made a number of requests. In this case, **we** will notify **you** and keep **you** updated.

### Your Right to Complain to the DPC

If **you** are not satisfied with **our** use of **your personal data** or our response to any request by **you** to exercise any of **your** rights in **Section 10: Your Rights and Contact Details of the DPC**, or if **you** think that **we** have breached the **GDPR**, then **you** have the right to complain to the **Data Protection Commission (DPC)**, the Irish supervisory authority for data protection issues. Please see below for contact details of the **DPC**.

The **DPC** would expect **you** to allow **us** to address **your** concerns first before referring to them so please contact **us** in the first instance.

To refer a matter to the **DPC** **you** should use their website <https://www.dataprotection.ie/docs/Raise-a-Concern/1716.htm> and complete the online form.

The contact details for the **DPC** are:

#### Republic of Ireland

Data Protection Commission  
Canal House, Station Road  
Portarlinton  
Co. Laois, R32 AP23  
Ireland

**Tel:** +353 (0761) 104 800

**LoCall:** 1890 25 22 31

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

## Section 11: Glossary of key terms

### Key insurance terms

**Beneficiary** is an individual or a company that an **insurance policy** states may receive a payment under the **insurance policy** if an insured event occurs. A beneficiary does not have to be the **insured/policyholder** and there may be more than one beneficiary under an **insurance policy**.

**Claimant** is either a **beneficiary** who is making a claim under an **insurance policy** or an individual or a company who is making a claim against a **beneficiary** where that claim is covered by the **insurance policy**.

**Claims processing** is the process of handling a claim that is made under an **insurance policy**.

**Quotation** is the process of providing a quote to a potential **insured/policyholder** for an **insurance policy**.

**Inception** is when the **insurance policy** starts.

**Insurance** is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression **insurance** may also mean **reinsurance**.

**Insurance policy** is a contract of insurance between the **insurer** and the **insured/policyholder**.

**Insurance market participant(s) or participants** is an **intermediary**, **insurer** or **reinsurer**.

**Insured/policyholder** is the individual or company in whose name the **insurance policy** is issued. A potential **insured/policyholder** may approach an **intermediary** to purchase an **insurance policy** or they may approach an **insurer** directly or via a price comparison website.

**Insurers**: (sometimes also called underwriters) provide insurance cover to **insured/policyholders** in return for **premium**. An **insurer** may also be a **reinsurer**.

**Intermediaries** help **policyholders** and **insurers** arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through **intermediaries**.

**Policy administration** is the process of administering and managing an **insurance policy** following its **inception**.

**Premium** is the amount of money to be paid by the **insured/policyholder** to the **insurer** in the **insurance policy**.

**Reinsurers** provide insurance cover to another **insurer** or **reinsurer**. That insurance is known as reinsurance.

**Renewal** is the process of the **insurer** under an **insurance policy** providing a **quotation** to the **insured/policyholder** for a new **insurance policy** to replace the existing one on its expiry.

**We, us or our** refers to Lockton Insurance Brokers (Ireland) Limited, a limited company with company number 594973 and its registered office at Hambleden House, 19-26 Pembroke Street Lower, Dublin 2, D02 WV96, Ireland, an insurance intermediary regulated by the Central Bank of Ireland.

**You or your** refers to the individual whose **personal data** may be processed by **us** and other **insurance market participants**. **You** may be the insured, beneficiary, **claimant** or other person involved in a claim or relevant to an **insurance policy**.

### Key data protection terms:

**Data Protection Laws** means all laws and regulations relating to the Processing of Personal Data, including the GDPR, as the same may be in force from time to time.

**GDPR** is the EU General Data Protection Regulation and forms the basis of the new Irish Data Protection Laws (Data Protection Acts 1988-2018).

**Data Controller** is an entity which collects and holds personal data. It decides what personal data it collects about you and how that personal data is used.

**Data Protection Commissioner (DPC)** is the regulator (or National Competent Authority/Data Protection Authority) for data protection matters in the Republic of Ireland.

**Personal Data** is any data from **you** which can be identified and which relates to **you**. It may include data about any claims **you** make.

**Processing of personal data** includes collecting, using, storing, disclosing or erasing your personal data.