

PRIVACY NOTICE

Coverys International Insurance Company DAC

1. PURPOSE AND SCOPE OF THIS PRIVACY NOTICE

We respect your right to data protection and privacy. This privacy notice ("**Notice**") sets out the basis on which we use, process, store or disclose any personal information about you ("**Personal Data**"), that we collect from you or that you provide to us through any interactions you have with us. For the purposes of this Notice, the controller of your Personal Data is Coverys International Insurance Company DAC ("**Coverys**", "**we**", "**our**" and "**us**") of The Victorians 15-18 Earlsfort Terrace, Dublin 2, D02 YX28, Ireland.

This Notice applies to our processing of Personal Data in the context of:

- Your use of this website (www.coverysinternational.com) ("**Website**");
- Any Coverys insurance policy where you are a policyholder;
- Any Coverys insurance policy where you are a claimant; and / or
- Any services or products provided by our suppliers.

2. OVERVIEW OF THIS NOTICE

We collect Personal Data from you when:

- you use, or interact with us via, the Website;
- you are a policyholder of a Coverys insurance policy;
- you make a claim in connection with a Coverys insurance policy; and/or
- you are a supplier of Coverys.

IMPORTANT: Where you provide Personal Data about other individuals (e.g. your representatives, intermediaries, legal counsel, doctor, healthcare provider or colleague), you agree that you are responsible for ensuring that such individuals know their Personal Data will be used by Coverys in accordance with this Notice.

If you have any queries, concerns or would like to exercise any of your data protection rights arising from this Notice, please contact our Data Protection Officer at dataprotection@coverysinternational.com.

For all other general queries, please e-mail hello@coverysinternational.com.

3. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

We will collect and process the following Personal Data about you in the following instances:

Personal Data	Details
Website Data	<p>When you visit the Website as a Website user, we will collect Personal Data relating to your: (a) visits and interactions with the Website including which webpages you visit, time and date of access, what you click on, when you perform these actions; and (b) device data including your IP address, location data, device type and language, browser type and other related information.</p> <p>Most of this Personal Data is collected using cookies on the Website. Please see our Cookies Policy for more information about how the Website uses cookies.</p>

Policyholder Data	<p>When you are a policyholder of an insurance policy with us, we will collect Personal Data from you in connection with your policy.</p> <p>For example: your name, contact details, date of birth, professional qualifications / experience, policy details, employment details and occupation, gender, medical history, any physical or mental injuries / illnesses suffered by you, bank and payment card details, details of any criminal convictions, information relating to your financial history, your claims history (if any), telephone recordings and previous insurer details.</p>
Claims Data	<p>When a claim is submitted in connection with an insurance policy, we will collect Personal Data to process the claim. For example: the circumstances of an incident giving rise to a claim (including your actions leading up to, during and after the incident), medical information (any injuries resulting from incidents and relevant pre-existing health conditions), damage estimates, reports on various aspects of the incident and communications with you and/or anyone acting on your behalf.</p>
Supplier Data	<p>When you engage with us as a supplier, we will collect Personal Data from you in connection with the services or products you provide to us. For example: your name, contact details and payment details.</p>
Support & Service Data	<p>You may choose to give us your Personal Data, such as your contact details when you interact with us by submitting general queries to us by e-mailing hello@coverysinternational.com.</p>

Please note that the above list of Personal Data which we may collect about you, while intended to be as complete and accurate as reasonably possible, is not exhaustive and may be updated from time to time.

4. HOW & WHY DO WE USE YOUR PERSONAL DATA?

The reasons why (“**Legal Basis**”) and how (“**Purposes**”) we process your Personal Data are explained in the below table:

Legal Basis	Purposes
To manage your policy – contractual necessity	<p>It is necessary to process your Personal Data to enter into and perform our contract with you, including for the purposes set out below.</p> <p>We will process your Personal Data for the following purposes:</p> <ul style="list-style-type: none"> To evaluate your eligibility to become a policyholder by making automated decisions about you to assess your risk profile, based on your profession and job description – see section 5 of this Notice for more details (<i>Do we process your personal data using automated means?</i>); To manage, assess, evaluate and administer claims in accordance with the terms of the relevant policy (e.g. including checking any previous claims connected to you) (<i>Do we process your personal data using automated means?</i>); To offer (or not offer) a policy of insurance to you; To verify the accuracy of any information and Personal Data we receive from you (including your identity); To manage our contract with you under the terms of an insurance policy (e.g. based on your eligibility, assess your level of insurance cover, assess the price of your insurance cover, underwrite your policy and administer your policy claims or benefits) or other contract (e.g. perform our obligations under a supplier contract);

	<ul style="list-style-type: none"> • To assess, investigate and process any claims made against you or by you in connection with your policy (e.g. assess claims, ensure claims are processed); • To make payments to you and receive payments from you or offer you renewal terms; • To offer you renewal terms; • To process any support & service requests from you (including, any complaints or claims); • To maintain and store records in relation to you on our IT systems; and/or • To provide you with access to the Website and to allow you to use the Website.
<p>To serve our policyholders, claimants, suppliers and our business – legitimate interests</p>	<p>It is necessary to collect and process your Personal Data for the purpose of pursuing our legitimate business interests where we have an appropriate, legitimate business need to use your Personal Data. The specific purposes of our pursuing our legitimate business interests are detailed below.</p> <p>We will process your Personal Data for the following purposes:</p> <ul style="list-style-type: none"> • Staff Training: to help train our staff to provide a service to you; • Record & Monitor Calls: to assess the quality of our staff's service to you and/or improve our service to you; • Information Security: to keep your Personal Data secure (e.g. by ensuring the technical and organisational measures are implemented within our processes and systems); • Fraud Detection: to assist in the detection and prevention of fraud and money laundering, and to protect you/our policyholders, claimants and ourselves from being the victims of fraud or money laundering; • Business Transfer/Re-organisation: to transfer and/or re-organise our business and assets; • Statistical Analysis & Market Research: to conduct assessments into our business performance to improve our products / services and for business planning; and • Settle Claims: to make an offer in relation to the settlement of a claim; • Legal Claims: where it is necessary for us to establish, investigate, exercise or defend a legal claim to which you are a party; and / or • Interact and correspond with you: we will process your Personal Data to assess and respond to your interactions with us. For example, when you e-mail a general query or request to hello@coverysinternational.com.
<p>To serve our website and our business – legitimate interests</p>	<p>We will process your Personal Data for the purposes of Website improvements & functionality, including:</p> <ul style="list-style-type: none"> • to provide you with use of the Website and allow you to optimally browse the Website; • to improve, test and monitor the effectiveness of the Website; • to monitor metrics such as total number of visitors, traffic data and demographic patterns; and • to ensure the content on the Website is presented in the most effective manner for you and your device.
<p>Compliance with Legal Obligations</p>	<p>We may process your Personal Data where it is necessary to comply with legal obligations to which we are subject under Irish and/or European Union Member State laws or regulatory requirements.</p> <p>We will process your Personal Data to comply with the following legislation (as may be amended):</p> <ul style="list-style-type: none"> • Anti-Money Laundering and Counter Terrorist Financing Acts; • Consumer Insurance Contracts Acts 2019; • European Union (Insurance and Reinsurance) Regulations 2015;

	<ul style="list-style-type: none"> • European Communities (Unfair Terms in Consumer Contracts) Regulations 1995; • European Communities (Distance Marketing of Consumer Financial Services) Regulations 2004; • Central Bank of Ireland Codes of Conduct; • Any other Irish or European Union Member State laws or regulatory requirements to which we are subject from time to time and which are relevant to our relationship with you; and / or • Warrants/notices issued by An Garda Síochána or other regulatory authorities in the context of inquiries or investigations.
For the purposes of a policy or claim	We will process special categories of personal data relating to you (e.g. data concerning health), subject to suitable and specific measures being taken to safeguard fundamental rights and freedoms, where it is necessary in connection with the assessment, evaluation or management of a policy or a claim.
To be a party in legal claims / court proceedings	We will obtain, collect and process special categories of personal data relating to you (e.g. data concerning health) where necessary to establish, exercise and/or defend legal claims to which we/you are subject or where a court order has been issued and, in particular, to: <ul style="list-style-type: none"> • determine if you or we have a legal claim; • gather evidence in the context of establishing, exercising or defending our legal claim with or against you; and/or • (seek to) establish, exercise or defend our legal claim with or against you; and settle claims.
Consent (Cookies) – website users only	Where we collect your Personal Data by using cookies on the Website, which are not necessary for the Website to operate, we require your consent to do so. Please see our Cookies Policy for more information.

IMPORTANT: it is a contractual requirement for you to provide your Personal Data for the purposes set out above. If you do not provide us with such Personal Data so that we can process it for these purposes, we will not be able to engage or interact with you. It is important that you provide us with accurate and up-to-date information at all times.

Further, when we process your Personal Data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your data protection rights. We will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by applicable law). You have certain rights when we process your Personal Data on this basis, such as the **right to object**. For more information on exercising this right please see section 10 of this Notice (***Your Data Protection Rights***).

5. DO WE PROCESS YOUR PERSONAL DATA USING AUTOMATED TOOLS?

This section applies to policyholders and claimants only.

We engage in automated decision making (i.e. profiling) to evaluate your risk rating, to determine policy premiums and/or to make decisions about claims. This profiling could have either legal effects for you or similarly significantly affects you (e.g. we may or may not offer to underwrite a policy or we may use the data to assess any probability of a claim being fraudulent or suspicious). When we carry out profiling, it is based on tools and systems which help us to assess factors such as: your profession, the nature of your professional work and your skill set.

IMPORTANT: if our automated decision making determines you are not eligible to be a policyholder or that a claim is fraudulent or suspicious, we will not offer you a policy of insurance or process a claim.

We will implement suitable measures to safeguard your rights, freedoms and legitimate interests, including providing you with the right to obtain human intervention and for you to express your point of view and contest the decision (i.e. a human will review the automated decision). If you wish to seek a review of any such decision, please contact our Data Protection Officer at: dataprotection@coverysinternational.com.

6. HOW DO WE COLLECT PERSONAL DATA ABOUT YOU?

We collect Personal Data about you from a variety of sources, including:

Source	Details
Directly from you	<p>We collect your Personal Data directly from you when you:</p> <ul style="list-style-type: none"> • provide information to us; • correspond with us by email, by telephone or by post (e.g. contact our customer service team); • submit a claim; and/or • request any information from us.
Indirectly about you	<p>We collect your Personal Data indirectly from third parties in certain circumstances. These parties include:</p> <ul style="list-style-type: none"> • other (re-)insurance companies; • your employer, broker, agent or representatives; • any third parties involved in a claim with you; • public registers (e.g. Companies Registration Office); • claim handlers and other experts that we may use to administer or carry out our obligations to you; • credit referencing agencies; • fraud, money laundering and crime prevention services and databases; • publicly available information, including information posted on websites and social; and/or • media official authorities (e.g. An Garda Síochána, the ambulance or fire services).

7. SHARING OF YOUR PERSONAL DATA

Depending on our reasons for processing your Personal Data, we will share it with all or some of the following recipients ("**Recipients**"):

- our staff, agents and contractors;
- staff, agents or contractors of our group companies (within the Coverys European Holdings group);
- witnesses to any claims in which you are involved;
- claimants and, as applicable, their representatives, intermediaries, legal counsel or doctor;
- Any party you have given us permission to speak to (e.g. your representatives, intermediaries, legal counsel, doctor, healthcare provider or colleague);
- other insurers and their agents (e.g. loss adjusters, investigators or legal counsel);
- our external providers or suppliers of services:
 - in relation to your policy or claims (e.g. loss adjusters, private investigators, expert appraisers, expert witnesses, reinsurance companies, etc.); and
 - in relation to our Website or business (e.g. our CRM provider, analytics & search engine providers that assist us in the improvement and optimisation of our Website);
- insurance market participants such as reinsurers or brokers who assist in the quotation and/or claims process;
- governmental bodies, law enforcement agencies and regulatory authorities; and
- our external professional advisors such as our legal advisors and consultants.

8. TRANSFERS OF YOUR PERSONAL DATA

We will transfer your Personal Data to certain Recipients (mainly our group companies in the UK / the US and our external service providers) who are located outside the European Economic Area ("EEA") in countries with laws and practices that do not contain equivalent data protection rights for your Personal Data (e.g. the US). Where such transfers occur, we ensure that appropriate safeguards are in place by ensuring that: a) transfers do not occur without our prior written authority; and b) an appropriate transfer mechanism, such as Module 2 of the Standard Contractual Clauses (as approved by the European Commission) or an adequacy decision of the European Commission (such as the European Commission's UK adequacy decision) is in place to protect your Personal Data. If you would like to find out more about any transfers which affect your Personal Data, please contact us by e-mailing our Data Protection Officer at: dataprotection@coverysinternational.com.

9. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Generally, your Personal Data will be retained for no longer than is necessary and will be managed in accordance with our data retention policy and as set out in the table below.

For policyholders and claimants, we have different retention periods for different types of policies and claims. For example, certain types of insurance policies allow for claims to be made many years after the term of a policy and therefore we need to retain your Personal Data to deal with any claims which may arise in the future.

Personal Data	Retention Period
Website Data	<ul style="list-style-type: none">See our Cookies Policy for more details.
Policyholder Data, Claims Data, Supplier Data, Support & Service Data	<p>The criteria used to determine our retention periods include:</p> <ul style="list-style-type: none">the length of our relationship with you;whether there is a legal obligation to which we are subject which requires us to retain your Personal Data; andwhether retention is prudent in light of our legal position (such as with respect to statutes of limitations, litigation or regulatory investigations), in which case the Personal Data may be kept for up to 7.5 years from date on which your policy expires.

10. YOUR DATA PROTECTION RIGHTS

You have a number of rights in relation to your Personal Data, which are set out below. In particular, these rights include the **right to object to processing of your Personal Data where that processing is carried out for our legitimate interests**. Note that these rights are not absolute. You can exercise these rights by e-mailing dataprotection@coverysinternational.com. We will aim to respond to your request within one-month of receiving it. We may have to extend the timeline of our response up to 2 further months if necessary, but we will contact you if this need arises. Please also note that we may need to verify your identity when you exercise your data protection rights.

Right	Details
Right to Information	You have a right to be provided with clear, transparent and easily understandable information about how we process your Personal Data. We give effect to this right by making this Notice available to you on the Website.
Right to Object	You have a right to object to our processing of your Personal Data where we rely on our legitimate business interests to process such data. You can request that we stop processing your Personal Data, and we will do so, unless we can demonstrate compelling legitimate grounds to continue processing your Personal Data or if we need your Personal Data in connection with any legal claims.
Right to Obtain Human Intervention	You have the right to human intervention to express your point of view and contest automated decisions (i.e. a human will review the automated decision).
Right to Withdraw Consent (Cookies)	You have a right to withdraw your consent to our processing of your Personal Data at any time. You can withdraw your consent by updating your cookies preferences or e-mailing the Data Protection Officer at: dataprotection@coverysinternational.com .
Right of Access	You have the right to access the Personal Data we process about you. If you exercise this right, you will receive confirmation about whether we process your Personal Data and, if so, a copy/copies of your Personal Data.
Right to Rectification	You have the right to correct the Personal Data we process about you if the Personal Data we hold about you is accurate or incomplete.
Right to Erasure	You have a right to request, in certain circumstances, the deletion of your Personal Data - for example if you exercise the right to object and we do not have an overriding reason to continue processing your Personal Data or if we no longer need to process your Personal Data.
Right to Restriction	You have the right, in certain circumstances, to restrict our processing of your Personal Data – for example, if you contest the accuracy of the Personal Data we hold about you or you object to us processing your Personal Data.
Right to Lodge a Complaint	You have the right to lodge a complaint with the Data Protection Commission (“DPC”) about our processing of your Personal Data. To do so, use the DPC’s “Raise a Concern” form . We encourage you to contact us before raising a concern with the DPC to see if we can resolve any concerns you have about our processing of your Personal Data.
Right to Data Portability	You can ask us to provide you with your data in a format which allows you to use it across different services.

11. RESPONSIBILITY TO INFORM US ABOUT CHANGES TO YOUR PERSONAL DATA

It is your responsibility to provide us with accurate and up-to-date Personal Data at all times. It is also necessary that the Personal Data we store (or otherwise process) about you is accurate and up to date in accordance with our obligations under applicable data protection law. You must keep us informed about any changes to your Personal Data (e.g., change of address, contact details, etc.). To inform us about any changes to your Personal Data, please contact us at dataprotection@coverysinternational.com

12. CHANGES TO THIS NOTICE

This Notice will be regularly reviewed and may be amended and updated from time to time as necessary. Any updates to this Notice will be posted to this section of the Website.

13. CONTACT US

If you have any questions, comments or concerns about the way your Personal Data are being used or processed by Coverys, please submit your question, comment or concern by e-mailing the Data Protection Officer at: dataprotection@coverysinternational.com.