

PATRONA

UNDERWRITING

Privacy Notice/Statement

Introduction

Patrona Underwriting Limited is committed to protecting and respecting your privacy. We wish to be transparent on how we process your data and show you that we are accountable with the GDPR in relation to not only processing your data but ensuring you understand your rights as a client.

It is the intention of this privacy statement to explain to you the information practices of Patrona Underwriting Limited in relation to the information we collect about you.

For the purposes of GDPR the data controller is Patrona Underwriting Limited. When we refer to 'we/us' within this document it is Patrona Underwriting Limited.

Please read this Statement carefully as this sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Who are we?

We are Patrona Underwriting Limited – a dynamic and flexible underwriting agency based in Ireland.

We provide tailored insurance products to the Irish market – exclusively through our network of brokers.

We have partnered with some of the world's leading insurers, to deliver innovative insurance solutions in targeted areas where our expertise resides. Our product range continues to evolve based on latest market conditions.

Personal interaction is a key feature of our broker relationships, and we believe that our products are backed up by exceptional service and support.

Our Data Protection Officer and data protection representatives can be contacted directly here:

Data Protection Officer

Email Address: customerservices@patrona.ie

Phone Number: 053 91 80300

Purpose for processing your data

Personal information provided will be used to set up, administer and manage your policy over the course of its life time. It will also be used to manage any claims/complaints made by you.

The information may also be used in the following ways:

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- For the detection/prevention of any activities that indicate fraud, money laundering or other offences.
- To verify identity when providing policy information over the phone.
- For statistical analysis or market research purposes.
- Staff training.
- For information backup purposes.
- Reporting purposes to reinsurance agencies.
- Compliance with all regulatory requirements.
- Any further processing as set out in this document or other documents made available to you.

The below table contains examples of the types of information we collect for the purposes set out in this document.

Information Category	Type of Collected Data
Policy Information	Name, address, date of birth, gender, licence details, payment details, vehicle details, property details, driving history, claims history, criminal convictions, penalty points, named driver details, business information,
Information provided by third party sources	Address Look ups, Eircode, vehicle details, vehicle history, penalty points, previous convictions, credit scores, risk details, etc
Current/Previous Claims information	Incident details, details provided by claimants, current/previous health issues, criminal convictions, property details, vehicle details,

Why we are processing your data? Our legal basis.

In order for us to provide you our products and services Patrona Underwriting Limited need to collect personal data for the provision of our insurance products and services. Our reason (lawful reason) for processing your data under the GDPR is:

Legal basis – Patrona Underwriting Limited needs to process your data as this is necessary in relation to a contract of insurance to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract. *This will include all products and services provided to the customer that relates to the setup, administration, maintenance, and completion of policies that have been requested by a customer. All information gathered will comply with both current Data Protection Laws as well any guidelines set down by the Central Bank of Ireland.*

In any event, Patrona Underwriting Limited are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

How will Patrona Underwriting Limited use the personal data it collects about you?

Patrona Underwriting Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary.

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Special Categories of personal data

If we collect any special categories of personal data (e.g. health, religious beliefs, racial, ethnic origin – financial information is not classified as special categories of personal data) – we will ensure that we will obtain your explicit consent.

Explicit Consent: This is consent that is freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Who are we sharing your data with?

We may pass your personal data on to third-party service providers contracted to Patrona Underwriting Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on your behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Patrona Underwriting Limited procedures.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your explicit consent, unless we are legally required to do otherwise.

The third parties that we pass your personal data to are:

- Your representatives, such as a relative, a named individual on the policy, your broker or any legal representatives you may appoint;
- Our own representatives, such as appointed legal counsel or third-party services providers for actions such as data storage, fraud detection, credit checking, motor assessors, risk analysis, etc;
- Other individuals, such as third-party claimants and their representatives, other insurance companies, anti-fraud data bases (e.g. Insurance link);
- Product reinsurers;
- External Auditors, either third party or regulatory i.e. Central Bank of Ireland;
- Government departments, such as An Garda Siochana and Motor Insurers' Bureau of Ireland.

We have issued all our third-party processors with a Data Processor checklist asking them GDPR specific questions to ensure they meet current GDPR standards.

If we transfer personal data to a third party or outside the EU we as the data controller will ensure the recipient (processor or another controller) has provided the appropriate safeguards and on condition that enforceable data subject rights and effective legal remedies for you the data subject are available.

Data Subjects Rights:

Patrona Underwriting Limited facilitate you, our clients, rights in line with our data protection policy and the subject access request procedure. This is available on request.

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At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

Right of access:

You have the right to request a copy of the information that we hold about you.

Right of rectification:

You have a right to correct data that we hold about you that is inaccurate or incomplete.

Right to be forgotten:

In certain circumstances you can ask for the data we hold about you to be erased from our records.

Right to restriction of processing:

Data Subject may request to restrict the processing of data that they feel is inaccurate, processed unlawfully, that is irrelevant to the contract, or have invoked their right to object.

Right of portability:

Data subject may request that all personal information be copied and transferred to another company in a readable and functional format.

Right to object:

You have the right to object to certain types of processing such as direct marketing.

Right to object to automated processing, including profiling:

Data subject may request to not have decisions made on the processing of their data solely based on an automated electronic process without any human intervention.

Right to judicial review:

In the event that we refuse your request under rights of access, we will provide you with a reason as to why.

All of the above requests will be forwarded on should there be a third party involved as we have indicated in the processing of your personal data.

Additional information we are providing you with to ensure we are transparent and fair with our processing

Retention of your personal data

Data will not be held for longer than is necessary for the purpose(s) for which they were obtained. Patrona Underwriting Limited will process personal data in accordance with our retention schedule. Only relevant data will be retained by Patrona in order for it to fulfil its legal and regulatory responsibilities.

Quote information: 15 months

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Policy information: 7 Years from end date of the policy.

Policy information where a claim is present: 7 years from when the claim is finalised

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Patrona Underwriting Limited or how your complaint has been handled, you have the right to lodge a complaint directly with the Data Protection Commission or Patrona Underwriting Limited's Data Protection Officer.

Failure to provide further information

If we are collecting your data for a contract and you cannot provide this data the consequences of this could mean the contract cannot be completed or details are incorrect.

Profiling – automatic decision making

Patrona use automated decision making when underwriting a policy, using information provided by you. In order to underwrite your policy, Patrona uses automated software to review and calculate a premium for a given risk based on the information provided to us. Where an automated decision-making process is in place, you are entitled to query the process to ensure that all information provided is correct and the quote provided (if any) is fair.

Additional Processing

If we intend to further process your personal data for a purpose other than for which the data was collected, we will provide this information prior to processing this data.

Contact Us

Your privacy is important to us. If you have any comments or questions regarding this statement, please contact us by:

Email Address: customerservices@patrona.ie

Phone Number: 053 91 80300

Privacy policy statement changes

Patrona Underwriting Limited may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services, you agree to this privacy policy.