



Privacy Policy

HDI Global SE - Ireland

Privacy Policy

Your privacy is very important to us. We promise to respect and protect your personal information and try to make sure that your details are accurate and kept up to date. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this Privacy Policy carefully. When using our website, this Privacy Policy should be read alongside the website terms and conditions.

[About HDI Ireland ▶](#)

[Our processing of your personal information ▶](#)

[Overseas transfers ▶](#)

[What marketing activities do we carry out? ▶](#)

[How long do we keep personal information for? ▶](#)

[Automated processing ▶](#)

[Your rights ▶](#)

[How we protect your information ▶](#)

[Contact us ▶](#)

[Updates to this Privacy Policy ▶](#)

About HDI Ireland

In this Privacy Policy references to "**we**" or "**us**" or "**HDI Ireland**" refer to HDI Global SE - Ireland. HDI Global SE – Ireland is a branch of HDI Global SE (registered office: HDI – Plat 21, 30659 Hannover, Germany). HDI Global SE is a company incorporated in Germany. We are part of the Talanx group.

In order to provide our services, we will collect and use information about individuals. We are the controller of all personal information we process pursuant to the products and services we provide and we are responsible for complying with data protection laws.

HDI Ireland has appointed a data protection officer to oversee our handling of personal information personal information in Ireland. If you have any questions about how we collect, store or use your personal information, you may contact our data protection officer using the details set out in the "[Contact Us](#)" section.

Telematics Data – applicable to Motor Fleet policies only

In respect of telematics data processed prior to the point of claim, to the extent it constitutes personal information; we will be the processor of such personal information. We will be controller of all telematics data processed during or after the point of claim.

Our processing of your personal information ►

We collect varying information about you and use it for different reasons according to the relationship we have with you. For example, we will collect different personal information depending on whether you are an individual policyholder, a third party claimant, an individual whose information we receive as part of the policy administration process, a witness, a contact at our business client or a business partner.

The majority of HDI Ireland's policies are taken out by business clients and which cover themselves, their employees and/or third party claimants. Due to the nature of these policies less personal information is collected prior to the point of claim.

Some of HDI Ireland's policies are 'personal policies' which are taken out by individuals and which cover themselves and in some cases additional persons (such as a spouse).

Sometimes we will request or receive your "sensitive personal information" (which is information relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership). For example we may need access to information about your health in order to provide you with a quote, provide your insurance policy, or process any claims you make. We may also need details of any unspent criminal convictions you have for fraud prevention purposes.

Where you provide personal information to us about other individuals (for example, members of your family or employees whose information is relevant to administering an insurance policy) we will also be controller of and responsible for their personal information. You should refer them to this notice before providing personal information to us on behalf of others.

Our legal grounds

We may process your information for a number of different purposes. For each purpose we must have a "legal ground" for this processing. For details of the legal grounds we rely upon please click one of the below:

[Personal information ►](#)

[Sensitive personal information ►](#)

Nature of our relationship with you

In order to make this notice as user friendly as possible we have split it into different sections which detail the information about the types of personal information we are likely to collect and use about you in different circumstances. Please click below to see details of these different types of relationship and click on the section below that best describes your relationship with us.

[Our relationship with you ►](#)

[Back to top](#)

[Our processing of your personal information ▶](#)

[Our legal grounds ▶](#)

[Personal information ▶](#)

We may process your information for a number of different purposes. For each purpose we must have a "legal ground" for this processing. We will rely on the following legal grounds when we process your information:

Performance of a contract	We need to use your personal information to enter into or perform a contract that we hold with you. For example, we need to use your personal information to provide you with a quote or to provide an insurance policy. We will rely on this for activities such as assessing your application, managing your insurance policy and handling claims.
Appropriate business need	<p>We have an appropriate business need to use your personal information as it is necessary for our everyday business operations and activities, to facilitate the provision of insurance to business clients, for example to maintain business records, to review our business models, to develop and improve our products and services, training and quality assurance, to maintain management information to monitor usage of the HDI Ireland website, and for internal audit purposes.</p> <p>When using your personal information for these purposes, we will always consider your rights and interests in privacy and whether they outweigh our interests in using your personal information for these purposes. We have implemented a procedure to assist us with this assessment.</p>
Legal or regulatory obligation	We have a legal or regulatory obligation to use such personal information. For example our regulators require us to hold certain records of our dealing with you and we are required by law to register corporate entity policyholder details with industry databases such as Insurance Link and Integrated Information Data Service and to do so, we must maintain mailing lists of business contacts at corporate policyholders.

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information ▶](#)

[Our legal grounds ▶](#)

[Sensitive personal information ▶](#)

When purpose involves the processing of information that is classed as "sensitive personal information" (this includes information relating to health and criminal convictions), we must have an additional "legal ground". We will rely on the following legal grounds when we process your "sensitive personal information":

Necessary for an insurance purpose	We need to use your health information for purposes relating to an insurance policy or claim. Such purposes include assessing an insurance application, administering a policy and managing claims.
Consent	You have provided your explicit consent to our use of your sensitive personal information (other than your health information where the "Necessary for an insurance purpose" legal ground is available). In some circumstances, we may need your consent to process sensitive personal information. For example to handle your claims or to otherwise provide a policy. We will always explain why your consent is necessary.
Legal rights	We need to use such sensitive personal information to establish, exercise or defend legal rights. This might happen when we are faced with legal proceedings or want to bring legal proceedings ourselves or we are considering the claim that has been made against our policyholder. We may also, for example, need to carry out investigations into fraudulent claims or money laundering.

This Privacy Policy sets out specific legal ground that applies to each of our purposes that enables us to process your personal and sensitive information.

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information ▶](#)
[Our relationship with you ▶](#)

[Where you are a claimant under a HDI Ireland insurance policy ▶](#)

[Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy? ▶](#)

[Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover? ▶](#)

[Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy ▶](#)

[Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder ▶](#)

[Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy ▶](#)

[Where you are a policyholder or are covered under a HDI Ireland personal insurance policy ▶](#)

[Where you are a broker, appointed representative or other business partner ▶](#)

[Where you are a user of the HDI Ireland website ▶](#)

[Our processing of your personal information ▶](#)
[Where you are a claimant under a HDI Ireland insurance policy ▶](#)

This section will apply if you make a claim a third party against someone who has a HDI Ireland insurance policy.

[What personal information will we collect? ▶](#)

[What sensitive personal information will we collect? ▶](#)

[How will we collect your personal information? ▶](#)

[What will we use your personal information for? ▶](#)

[Who will we share your personal information with? ▶](#)

[Our processing of your personal information ▶](#)
[Where you are a claimant under a HDI Ireland insurance policy ▶](#)
[What personal information will we collect? ▶](#)

- General information such as your name, address, contact details, date of birth and gender.
- Identification information such as your PPS number.
- Where relevant, information about your relationship to the policyholder.
- Information about your job including job title, and professional accreditations.
- Information relevant to your claim, including the name and contact details of your insurer and details about your claim (including any statements, photos / video footage, claims assessment reports). This will depend on the type of claim you make. For example, if you make a claim following a road traffic accident, we may use personal information which relates to your vehicle and named drivers.
- Information relating to previous insurance policies or claims.
- Financial information such as your bank details and payment details.
- Information (including photographs) obtained as a result of carrying out checks of publically available sources such as newspapers and social media sites in the event that we suspect fraudulent activity.
- Information we obtain as a result of checking sanctions lists.
- Financial Information: Bank and payment information
- Other information: that we capture during telephone calls, or if you make a complaint.

[Our processing of your personal information ▶](#)

[Where you are a claimant under a HDI Ireland insurance policy ▶](#)

[What sensitive personal information will we collect? ▶](#)

- **Health Data:** Physical or mental health factors which are relevant to your claim (e.g. where you have been injured in a road traffic accident and the driver is insured through us). This may include medical records relating to any injuries.
- **Criminal convictions** which are unspent under the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016. This includes both motoring and non-motoring offences / alleged offences which you have committed, or any court sentences to which you are subject.

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information](#) ►
[Where you are a claimant under a HDI Ireland insurance policy](#) ►
[How will we collect your personal information?](#) ►

We will collect information directly from you:

- When you make a claim;
- When you contact us by email, telephone and through other written and verbal communications;
- When you contact our third party administrators by telephone, including The Davies Group (please note that call recording may be used); or
- When you make a complaint.

As well as obtaining information directly from you, we will collect information from:

- The party who holds a policy with us;
- Any agent that you use;
- Third parties involved in the insurance policy or claim (such as our business partners and representatives, brokers or other insurers, claimants, defendants or witnesses to an incident);
- Third parties who provide a service in relation to the claim (such as loss adjusters, claims handlers, and experts);
- Telematics companies;
- Other Talanx group companies;
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions);
- Our regulators including the Central Bank of Ireland and the Data Protection Commission;
- An Garda Síochána and other crime prevention and detection agencies; and
- Third party administrators and suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.

Where you are a claimant under a HDI Ireland insurance policy

Our processing of your personal information ►
 Where you are a claimant under a HDI Ireland insurance policy ►
 What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
To investigate and manage claims .	<ul style="list-style-type: none"> • Appropriate business need (to assess and pay your claim and manage the claims process). 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose (to handle claims) • Other sensitive personal information: Consent. In some circumstances, we will need your consent before we can process your claim. • Legal rights.
To carry out fraud, credit and anti-money laundering checks.	<ul style="list-style-type: none"> • Appropriate business need (to prevent fraud and other financial crime). 	<ul style="list-style-type: none"> • Legal rights.
To comply with our legal or regulatory obligations (e.g. reporting to the Central Bank of Ireland).	<ul style="list-style-type: none"> • Legal or regulatory obligation. 	
To provide improved quality, training and security (for example, through monitored phone calls to our contact numbers).	<ul style="list-style-type: none"> • Appropriate business need (to develop and improve the products we offer). 	
To enable us to manage our business operations, such as by maintaining accounting records, carrying out analysis of financial results, using information to meet internal audit requirements, and receiving professional advice (e.g. tax or legal advice).	<ul style="list-style-type: none"> • Appropriate business need (to effectively manage our business). 	
For insurance risk modelling and product and pricing refinement.	<ul style="list-style-type: none"> • Appropriate business need (to develop and improve the products and services we offer). 	
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> • Appropriate business need (to ensure that we have appropriate insurance in place). 	

[Our processing of your personal information ▶](#)
[Where you are a claimant under a HDI Ireland insurance policy ▶](#)
[Who will we share your personal information with? ▶](#)

From time to time, we may share your personal information between our internal departments and with companies in the Talanx group as follows:

- Via internal reports;
- Via access to central IT systems;
- We are using information for the prevention or detection of fraud or other crime; or
- Where we need to report information within our group of companies.

or with the following third parties for the purposes set out above:

- Our insurance and reinsurance partners such as brokers, other (re)insurers or other companies who act as (re)insurance distributors;
- Other third parties who assist in the administration of your claim, such as loss adjusters, claims handlers, accountants, auditors, banks, lawyers and other experts including medical experts;
- Our regulators including the Central Bank of Ireland;
- Insurance industry databases such as Insurance Link and Integrated Information Data Service, fraud detection agencies and other third parties who operate and maintain fraud detection registers or undertake investigations in cases of suspected insurance fraud;
- The An Garda Síochána and other third parties (such as banks or other insurance companies) where reasonably necessary for the prevention or detection of crime;
- Other insurers who provide our own insurance;
- Credit referencing agencies and third parties who carry out sanctions checks on our behalf;
- Third parties who we have entered into contractual arrangements with to provide services we need to carry out our everyday business activities such as document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers;
- Selected third parties in connection with any sale, transfer or disposal of our business; and
- Where necessary, courts and other alternative dispute resolution providers (such as arbitrators, mediators and the Financial Ombudsman Service).

If you would like further information regarding the disclosures of your personal information, please see the "[Contact us](#)" section below for our contact details.

Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy

[Our processing of your personal information ▶](#)

[Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy ▶](#)

This section will apply if you are a witness to an incident or an individual who otherwise provides us with information in relation to an incident which is the subject of a claim under a HDI Ireland policy.

[What personal information will we collect? ▶](#)

[What sensitive personal information will we collect? ▶](#)

[How will we collect your personal information? ▶](#)

[What will we use your personal information for? ▶](#)

[Who will we share your personal information with? ▶](#)

[Back to start of section](#)

[Back to top](#)

Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy

[Our processing of your personal information ▶](#)

[Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy ▶](#)

[What personal information will we collect? ▶](#)

- General information such as your name, address, contact details, date of birth and gender.
- Information about your job including job title, and the nature of the industry you work in.
- Information relevant to the incident or alleged incident that you have witnessed.
- Photographic or Video Data including photos or footage recorded relating to a claim (including incident circumstances and interviews).
- Other information: that we capture during recordings of our telephone calls, or if you make a complaint.

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information ▶](#)

[Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy ▶](#)

[What sensitive personal information will we collect? ▶](#)

Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy

Whilst we do not actively request your sensitive personal information, you may disclose it or we may collect it if it is relevant to the incident of the claim, for example you have a disability which impacts your recollection of the incident.

[Back to start of section](#)

[Back to top](#)

Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy

[Our processing of your personal information](#) ▶

[Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy](#) ▶

[How will we collect your personal information?](#) ▶

We will collect information directly from you:

- When we contact you by email, telephone and through other written and verbal communications;
- When you contact our third party administrators by telephone, including The Davies Group (please note that call recording may be used); or
- When you make a complaint.

We also use information from external sources to supplement and verify information provided by you, and also to provide the following new information:

- Other parties involved in the incident you witnessed (such as any named individual insured through us, passengers, other witnesses, third party claimants, brokers, insurers, and the emergency services);
- Other third parties who provide a service in relation to a claim (such as external claims handlers, our accident repair network, medical experts, claims investigators and, in limited circumstances, private investigators);
- Publically available sources such as the electoral roll, court judgments, insolvency registers, internet search engines, news articles and social media sites;
- Telematics companies;
- Other Talanx group companies;
- An Garda Síochána and other crime prevention and detection agencies; and
- Third party administrators and suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers.

[Back to start of section](#)

[Back to top](#)

Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy

Our processing of your personal information ►
 Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy ►
 What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
To investigate and manage claims made against or under an insurance policy.	<ul style="list-style-type: none"> Appropriate business need (to assess and pay claims and manage the claims process). 	<ul style="list-style-type: none"> Health information: Necessary for an insurance purpose. Other sensitive personal information: Consent. Legal rights.
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> Legal or regulatory obligation . 	
To prevent and investigate fraud.	<ul style="list-style-type: none"> Appropriate business need (to prevent and detect fraud and other financial crime). 	<ul style="list-style-type: none"> Legal rights.
To enable us to manage our business operations, such as by maintaining accounting records, carrying out analysis of financial results, using information to meet internal audit requirements, and receiving professional advice (e.g. tax or legal advice).	<ul style="list-style-type: none"> Appropriate business need (to effectively manage our business). 	
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> Appropriate business need (to ensure that we have appropriate insurance in place). 	

Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy

[Our processing of your personal information](#) ▶

[Where you witnessed an incident involving someone covered under a HDI Ireland insurance policy](#) ▶

[Who will we share your personal information with?](#) ▶

From time to time, we may share your personal information between our internal departments and with companies in the Talanx group as follows:

- Via internal reports;
- Via access to central IT systems;
- Where we are using information for the prevention or detection of fraud or other crime; or
- Where we need to report information within our group of companies.

Or with the following third parties for the purposes set out above:

- Other parties involved in the incident you witnessed;
- Other insurers (e.g. where another insurer is also involved in the claim which relates to the incident you witnessed);
- Our insurance and reinsurance partners such as brokers, other (re)insurers or other companies who act as (re)insurance distributors;
- Other third parties who assist in the administration of a claim, such as loss adjusters, claims handlers, accountants, auditors, banks, lawyers and other experts including medical experts;
- Our regulators including the Central Bank of Ireland;
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers or undertake investigations in cases of suspected insurance fraud;
- An Garda Síochána and other third parties (such as banks or other insurance companies) where reasonably necessary for the prevention or detection of crime;
- Other insurers who provide our own insurance;
- Third parties who we have entered into contractual arrangements with to provide services we need to carry out our everyday business activities such as document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers;
- Selected third parties in connection with any sale, transfer or disposal of our business; and
- Where necessary, courts and other alternative dispute resolution providers (such as arbitrators, mediators and the Financial Services and Pensions Ombudsman).

If you would like further information regarding the disclosures of your personal information, please see the "[Contact us](#)" section below for our contact details.

[Back to start of section](#)

[Back to top](#)

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover

Our processing of your personal information ►

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover ►

This section will apply where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover, for example a director under a directors and officers liability insurance policy, a CEO under a motor policy or an employee whose information is relevant to an employers' liability policy or your information has been passed to us by your employer as part of previous claims history (for example you previously made a claim under your employers' previous insurance policy) , this section will be relevant to you and sets out our uses of your personal information.

[What personal information will we collect? ►](#)

[What sensitive personal information will we collect? ►](#)

[How will we collect your personal information? ►](#)

[What will we use your personal information for? ►](#)

[Who will we share your personal information with? ►](#)

[Back to start of section](#)

[Back to top](#)

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover

Our processing of your personal information ►

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover ►

What personal information will we collect? ►

- General identification such as your name, address, date of birth, gender and contact details such as telephone numbers and email addresses.
- Information about your relationship to the business policyholder such as you are a director of the corporate organisation who has taken out a policy with us.
- Identity documents such as national insurance number or passport number.
- Information about your job such as job title, CV, employment history and employment records (including information on your salary, benefits and earnings), and professional accreditations.
- Any information which is relevant to the insurance policy including:
 - Information about previous claims you have made; and
 - Information specific to the type of insurance cover such as where your employer is applying for a professional liability policy which covers you, we may collect and use personal information which relates to previous disciplinary issues or where you are a director and your employer is taking out motor insurance for business vehicles used by directors, we will collect details about your vehicle type and vehicle registration number.
- Information which we have gathered from publically available sources such as internet search engines like Google, corporate client websites and social media sites, including Facebook, YouTube and LinkedIn.

[Back to start of section](#)

[Back to top](#)

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover

Our processing of your personal information ►

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover ►

What sensitive personal information will we collect? ►

- Details regarding criminal offences, including alleged offences, criminal proceedings, court judgments, outcomes and sentences. For example where you are a CEO of the business policyholder who has taken out a motor insurance policy for you, we may collect information about any traffic offences you have committed.
- Details of your current or former physical or mental health if it relates to previous claims that have been made under the corporate policyholder's previous insurance policies. For example if you have previously made a claim under your employers' liability insurance policy, when we ask the corporate policyholder for claims history, they may provide details of your medical conditions. This may require us to collect medical reports or underlying medical data such as x-rays or blood tests.

[Back to start of section](#)

[Back to top](#)

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover

Our processing of your personal information ►

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover ►

How will we collect your personal information? ►

The business who has an insurance policy with us (such as your employer) will provide your personal information directly to us when they:

- Apply or renew a policy;
- Submits a claim on its policy; or
- Contact us via telephone calls, email and other written and verbal communications.

As well as obtaining information directly from the business policyholder, we will collect information from:

- Third parties involved in the administration of an insurance policy such as our business partners and representatives, brokers or other insurers;
- Publicly available sources such as internet search engines like Google, business client websites and social media sites, including Facebook, YouTube and LinkedIn; and
- Other Talanx group companies.

[Back to start of section](#)

[Back to top](#)

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover

Our processing of your personal information ►

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover ►

What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
To evaluate our insurance application and provide a quote.	<ul style="list-style-type: none"> • Appropriate business need (to assess an insurance application and provide a quote). 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
To administer an insurance policy.	<ul style="list-style-type: none"> • Appropriate business need (to provide suitable insurance cover). 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
Communicating with the corporate policyholder and resolving any complaints that it might have.	<ul style="list-style-type: none"> • Appropriate business need (to communicate with the policyholder about the policy and investigate any complaints). 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
Providing improved quality, training and security (for example, with respect to monitored phone calls to our contact numbers).	<ul style="list-style-type: none"> • Appropriate business need (to improve the quality of products and services we offer). 	
continued on next page		

[Back to start of section](#)

[Back to top](#)

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover

Our processing of your personal information ►

Where you are an individual whose information is passed to us by business clients when we assess administer insurance policies, assess risk, determine premium and provide cover ►

What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
continued from previous page		
Complying with our legal or regulatory obligations (e.g. reporting to the Central Bank of Ireland).	<ul style="list-style-type: none"> • Legal or regulatory obligations. 	
Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice).	<ul style="list-style-type: none"> • Appropriate business need (to effectively manage our business operations). 	<ul style="list-style-type: none"> • Legal rights.
Reviewing our product offerings and improving our products and services and similar products and services we offer.	<ul style="list-style-type: none"> • Appropriate business need (to develop and improve the products and services we offer). 	
Investigating or detecting the unauthorised use of our systems, to secure our system and to ensure the effective operation of our systems.	<ul style="list-style-type: none"> • Appropriate business need (to ensure the integrity and security of our systems). 	

Where you are an individual whose information is passed to us by business clients when we assess, administer insurance policies, assess risk, determine premium and provide cover

Our processing of your personal information ►

Where you are an individual whose information is passed to us by business clients when we assess, administer insurance policies, assess risk, determine premium and provide cover ►

Who will we share your personal information with? ►

We will keep your personal information confidential and we will only share it where necessary for the purposes set out above with the following parties:

- The business policyholder;
- We will always share your personal information with our head office that is based in Hanover but we may also share it with Talanx group companies;
- Third parties involved in the insurance distribution chain such as brokers, sub-brokers, coverholders, other insurers, reinsurers or other companies who act as insurance distributors;
- Other insurers who provide our own insurance (reinsurers) and companies who arrange such reinsurance;
- Our regulators including the Central Bank of Ireland;
- Our service providers who we have engaged for everyday business activities such as actuaries, auditors, legal and tax advisers, IT providers, marketing agencies and document management providers;
- Selected third parties in connection with any sale, transfer or disposal of our business;
- Insurance industry bodies;
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers;
- An Garda Síochána, other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime; and
- Credit reference agencies.

[Back to start of section](#)

[Back to top](#)

Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy

Our processing of your personal information ►
Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy ►

This section will apply if your information is processed in relation to a business insurance policy held by your employer (for example, if you are a driver of a vehicle that we insure).

[What personal information will we collect? ►](#)

[What sensitive personal information will we collect? ►](#)

[How will we collect your personal information? ►](#)

[What will we use your personal information for? ►](#)

[Who will we share your personal information with? ►](#)

Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy

[Our processing of your personal information ▶](#)

[Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy ▶](#)

[What personal information will we collect? ▶](#)

- General information such as your name, address, contact details, date of birth and gender.
- Information about your job including job title and your employment history.
- Information relevant to any claim made. Information relating to previous insurance policies or claims.
- Information obtained during telephone calls.

Telematics

We will also receive Telematics Information relevant to your employer's policy. The telematics black box fitted to the insured car collects a wide range of driving data such as:

- Date/Time: This helps us to understand at what time of day the car is driven.
- Locational Data: This helps us to understand which roads the car is driven on.
- Speed, Acceleration, and Braking Data: This helps us to understand how smooth the driving style is.
- Accident Detection: This helps us to identify when an accident has occurred and to understand the circumstances relating to any accident.
- Photographic or Video Data: Including photos taken of the car at the point that the telematics box is installed or footage recorded relating to a claim (including accident circumstances and interviews).

Where we process this information prior to claim we will be your employer's processor and your employer's privacy policy will apply.

[Back to start of section](#)

[Back to top](#)

Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy

Our processing of your personal information ►

Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy ►

What sensitive personal information will we collect? ►

- Information relating to your criminal convictions (including offences and alleged offences and any court sentence or unspent criminal conviction).
- If relevant, details of your current or former health condition. For example, if you are injured whilst driving, and your employer makes a claim under their insurance policy in relation to your injury.

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information ▶](#)

[Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy ▶](#)

[How will we collect your personal information? ▶](#)

We will collect information directly from you:

- When you make a claim;
- When you contact us by email, telephone and through other written and verbal communications;
- When you contact our third party administrators by telephone (please note that call recording may be used); or
- When you make a complaint.

As well as obtaining information directly from you, we will collect information from:

- Your employer who is the policyholder when they apply for the policy or make a claim or when they provide us with telematics data;
- Third parties involved in the insurance policy or claim (such as our business partners and representatives, brokers or other insurers, claimants, defendants or witnesses to an incident);
- Third parties who provide a service in relation to the claim (such as loss adjusters, claims handlers, and experts);
- Third party service providers including providers of telematics data and services;
- Other Talanx group companies;
- Our regulators including the Central Bank of Ireland;
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions);
- Third party administrators and suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers; and
- Selected third parties in connection with any sale, transfer or disposal of our business.

[Back to start of section](#)

[Back to top](#)

Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy

Our processing of your personal information ►
Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy ►
What will we use your personal information for? ►

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your sensitive personal information ►
To carry out fraud, credit and anti-money laundering checks .	<ul style="list-style-type: none"> • Appropriate business need (to prevent fraud and other financial crime). 	<ul style="list-style-type: none"> • Legal rights.
Using telematics data to monitor driving practices and help manage risk.	<ul style="list-style-type: none"> • Appropriate business need (to monitor the driving behaviours of drivers insured by us). 	
To manage any claims you make under the relevant insurance policy.	<ul style="list-style-type: none"> • Appropriate business need (to assess and pay your claim and manage the claims process). 	<ul style="list-style-type: none"> • Necessary for an insurance purpose.
Arranging and executing inspections and reporting back to your employer.	<ul style="list-style-type: none"> • Appropriate business need (to report back to on our findings). 	
To report back on defects found during examination of equipment which pose a danger and threaten the wellbeing of the public and any employees.	<ul style="list-style-type: none"> • Appropriate business need (to report back to your employer on any defects). • It is necessary to protect your vital interests as an employee. 	
To investigate health and safety breach or RIDDOR incident.	<ul style="list-style-type: none"> • Appropriate business need (to report back to your employer on any defects). • It is necessary to protect your vital interests as an employee. 	

[continued on next page](#)

Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy

Our processing of your personal information ►
Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy ►
What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
continued from previous page		
Investigating/validation of facts in the event of a risk event/incident .	<ul style="list-style-type: none"> • Appropriate business need (to investigate any facts where there is a risk posed). 	
To comply with our legal or regulatory obligations.	<ul style="list-style-type: none"> • Legal or regulatory obligations. 	
To communicate with you and resolve any complaints that you might have.	<ul style="list-style-type: none"> • We have an appropriate business need (to send you communications, record and investigate complaints and ensure that future complaints are handled appropriately). 	<ul style="list-style-type: none"> • Legal rights. • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
To provide improved quality, training and security (for example, through monitored phone calls to our contact numbers).	<ul style="list-style-type: none"> • Appropriate business need (to monitor and improve services we offer). 	
To enable us to manage our business operations, such as by maintaining accounting records, carrying out analysis of financial results, using information to meet internal audit requirements, and receiving professional advice (e.g. tax or legal advice) .	<ul style="list-style-type: none"> • Appropriate business need (to effectively manage our business). 	
For insurance risk modelling and product and pricing refinement.	<ul style="list-style-type: none"> • Appropriate business need (to develop and improve the products and services we offer). 	

Our processing of your personal information ►

Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy ►

Who will we share your personal information with? ►

Where you are an employee of a business with a telematics reliant HDI Ireland Motor Fleet policy

From time to time, we may share your personal information between our internal departments and with companies in the Talanx group as follows:

- Via internal reports;
- Via access to central IT systems; and
- Where we need to report information within our group of companies.

Or with the following third parties for the purposes set out above:

- Our insurance and reinsurance partners such as brokers, other (re)insurers or other companies who act as (re)insurance distributors;
- Other third parties who assist in the administration of your employers insurance policy or claim, such as loss adjusters, claims handlers, accountants, auditors, banks, lawyers and other experts including medical experts;
- Any agent or representative acting for you or your employer;
- Where your policy requires us to provide insurance cover for a property(ies), risk engineers;
- Financial crime and fraud detection agencies;
- Our regulators including the Central Bank of Ireland;
- Selected third parties in connection with any sale, transfer or disposal of our business;
- Our insurers;
- Industry data bases such as the Insurance Link and Integrated Information Data Service and fraud detection agencies and other third parties who operate and maintain fraud detection registers or undertake investigations in cases of suspected insurance fraud;
- The An Garda Síochána and other crime prevention and detection agencies;
- Third parties who we have entered into contractual arrangements with to provide services we need to carry out our everyday business activities such as document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers;
- Selected third parties in connection with any sale, transfer or disposal of our business; and
- Where necessary, courts and other alternative dispute resolution providers (such as arbitrators, mediators and the Financial Services and Pensions Ombudsman).

If you would like further information regarding the disclosures of your personal information, please see the "[Contact us](#)" section below for our contact details.

[Back to start of section](#)

[Back to top](#)

Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder

[Our processing of your personal information ▶](#)

[Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder ▶](#)

If you are a business contact for our corporate policyholder or for a prospective corporate policyholder, this section will be relevant to you and sets out our uses of your personal information.

[What personal information will we collect? ▶](#)

[What sensitive personal information will we collect? ▶](#)

[How will we collect your personal information? ▶](#)

[What will we use your personal information for? ▶](#)

[Who will we share your personal information with? ▶](#)

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information](#) ▶

[Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder](#) ▶

[What personal information will we collect?](#) ▶

- Your name, address and contact information, including telephone numbers and email addresses.
- Information about your job such as job title and professional accreditations.
- Related information about the existing or prospective business policyholder which you represent.
- Related information about the existing or prospective business policyholder which you represent
- Information obtained from carrying out identification checks and checking sanctions list.
- Information which we have gathered from publically available sources such as internet search engines like Google, business policyholder websites and social media sites such as LinkedIn.

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information ▶](#)

[Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder ▶](#)

[What sensitive personal information will we collect? ▶](#)

Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder

Please note that we do not collect any special categories of personal information about you.

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information](#) ▶

[Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder](#) ▶

[How will we collect your personal information?](#) ▶

As well as obtaining information directly from you, we will collect information from:

- Other contacts at the business policyholder;
- Brokers who have passed on your information;
- Other Talanx group companies; and
- Publically available sources such as internet search engines like Google, corporate policyholder websites and social media sites such as LinkedIn.

[Back to start of section](#)

[Back to top](#)

Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder

Our processing of your personal information ►
Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder ►
What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
To create and maintain our business relationships.	<ul style="list-style-type: none"> • Appropriate business need (to build strong business relationships and manage such relationships). • Legal obligations. 	
To provide insurance policies to business and provide insurance documentation and general communication to handle claims.	<ul style="list-style-type: none"> • Appropriate business need (to provide insurance policies and administer all associated insurance services to corporate entities). • Legal obligations. 	
Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice).	<ul style="list-style-type: none"> • Appropriate business need (to effectively manage our business operations). • Legal obligations. 	
Providing improved quality, training and security (for example, with respect to monitored phone calls to our contact numbers).	<ul style="list-style-type: none"> • Appropriate business need (to develop and improve the products and services we offer). 	
Communicating with you to manage and handle your queries.	<ul style="list-style-type: none"> • Appropriate business need (to send you communications to effectively manage our business and respond to your queries). • Legal obligations. 	
Investigating or detecting the unauthorised use of our systems, to secure our system and to ensure the effective operation of our systems).	<ul style="list-style-type: none"> • Appropriate business need (to ensure the integrity and security of our systems). 	

[Our processing of your personal information ▶](#)

[Business contacts at an organisation which is a prospective or existing HDI Ireland business policyholder ▶](#)

[Who will we share your personal information with? ▶](#)

We will keep your personal information confidential and we will only share it where necessary for the purposes set out above with the following parties:

- We will always share your personal information with our head office that is based in Hannover but we may also share it with our other group companies in the Talanx Group;
- Third parties involved in the insurance distribution chain such as brokers, sub-brokers, coverholders, other insurers, reinsurers or other companies who act as insurance distributors ;
- Our regulators the Financial Conduct Authority and the Prudential Regulation Authority;
- Our service providers who we have engaged for everyday business activities such as actuaries, auditors, legal and tax advisers, IT providers, marketing agencies and document management providers; and
- Selected third parties in connection with any sale, transfer or disposal of our business.

[Back to start of section](#)

[Back to top](#)

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy

[Our processing of your personal information ▶](#)

[Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy ▶](#)

This section will apply if you apply for or would be covered under a personal policy with us (such as one of our accident and health policies).

[What personal information will we collect? ▶](#)

[What sensitive personal information will we collect? ▶](#)

[How will we collect your personal information? ▶](#)

[What will we use your personal information for? ▶](#)

[Who will we share your personal information with? ▶](#)

[Back to start of section](#)

[Back to top](#)

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy

Our processing of your personal information ►

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy ►

What personal information will we collect? ►

General information such as your name, address, phone numbers and email addresses, date of birth and gender.

- Identification information including passport, national identity card (for non-Irish nationals), government issued ID verification and address verification documents such as council tax letters or bank statement and evidence of benefit entitlement.
- Employment information such as job title.
- Your broker reference number (where applicable).
- Financial information relevant to the policy to which your enquiry relates, including:
 - Bank details; and
 - Financial reviews (fact finds).
- Information obtained from carrying out identification checks and checking sanction lists.
- Information about your family including information about your dependants.
- Information obtained during telephone calls.

[Back to start of section](#)

[Back to top](#)

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy

Our processing of your personal information ▶

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy ▶

What sensitive personal information will we collect? ▶

We may collect details about your physical and mental health and any criminal records which are relevant to your application for example where we need to understand about any medical conditions that could affect your ability to be covered by the relevant policy.

[Back to start of section](#)

[Back to top](#)

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy

[Our processing of your personal information ▶](#)

[Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy ▶](#)

[How will we collect your personal information? ▶](#)

We will collect information directly from you:

- Face to face (directly from you and through third parties e.g. brokers or loss adjusters);
- Via proposal forms (submitted directly by you and through third parties e.g. brokers);
- From you:
 - By telephone;
 - By email;
 - Via our website; and
 - Via the internet.

We will also collect your personal information from:

- Your broker;
- Any underwriting questionnaires or application;
- Other business partners and representatives, including The Davies Group, which is the company that we outsource our claims management process to;
- From other insurance companies;
- Publically available sources such as internet search engines and social media sites;
- Other Talanx group companies;
- Third party providers including credit checks service providers; and
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).

[Back to start of section](#)

[Back to top](#)

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy

Our processing of your personal information ►
Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy ►
What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
Assessment of policy eligibility.	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to assess the eligibility of an individual before we provide insurance cover). 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
Determining underwriting premium price.	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to determine an appropriate premium price). 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
To carry out identification checks.	<ul style="list-style-type: none"> • Appropriate business need (to carry out necessary compliance checks). • Legal or regulatory obligation. 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
To answer any queries you may have and to provide you with a quote for the policy in question.	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to communicate with you and ensure that the policy is appropriate for your requirements) . 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent. • Legal rights.
To arrange an insurance policy for you.	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to ensure that the product is appropriate for your requirements). 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.

[continued on next page](#)

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy

Our processing of your personal information ►
Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy ►
What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
continued from previous page		
To prevent and investigate fraud.	<ul style="list-style-type: none"> • Legal or regulatory obligations (to detect fraud). 	<ul style="list-style-type: none"> • Legal rights.
To comply with our legal or regulatory obligations (e.g. reporting to Central Bank of Ireland).	<ul style="list-style-type: none"> • Legal or regulatory obligations. 	
To communicate with you and resolve any complaints that you might have.	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to communicate with you, record and investigate complaints and ensure that complaints are handled appropriately). • Legal or and regulatory obligations. 	<ul style="list-style-type: none"> • Legal rights. • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
To provide improved quality, training and security (for example, through monitored phone calls to our contact numbers, or monitoring user journeys on our website).	<ul style="list-style-type: none"> • Appropriate business need (to develop and improve the products we offer). 	
For business purposes and activities including maintaining business records, file keeping, strategic business planning and internal audit, management information and receiving legal and financial advice.	<ul style="list-style-type: none"> • Appropriate business need (to run our business efficiently and effectively). 	
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> • Appropriate business need (to maintain appropriate insurance). 	

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy

Our processing of your personal information ►

Where you are a prospective policyholder or will be covered under a HDI Ireland personal insurance policy ►

Who will we share your personal information with? ►

From time to time, we may share your personal information between our internal departments and with companies in the Talanx group as follows:

- Via internal reports;
- Via access to central IT systems;
- Where we need to obtain a quote for you from another group company;
- Where one of our group companies is unable to provide you with an insurance policy but another might be able to assist you; or
- Where we need to report information within our group of companies.

Or with the following third parties for the purposes set out above:

- Third parties who provide a service in relation to your policy, including other insurers, brokers reinsurers and third party administrators. Where we have shared your personal information with these third parties;
- Any agent or representative acting for you;
- Financial crime and fraud detection agencies;
- Our regulators including the Central Bank of Ireland;
- Selected third parties in connection with any sale, transfer or disposal of our business;
- Our insurers;
- An Garda Síochána and other crime prevention and detection agencies; and
- Third parties who we have entered into contractual arrangements with to provide services we need to carry out our everyday business activities such as document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers.

If you would like further information regarding the disclosures of your personal information, please see the "[Contact us](#)" section below for our contact details.

[Back to start of section](#)

[Back to top](#)

Where you are a policyholder or are covered under a HDI Ireland personal insurance policy

[Our processing of your personal information ▶](#)

[Where you are a policyholder or are covered under a HDI Ireland personal insurance policy ▶](#)

This section will apply if you take out or are covered under a HDI Ireland personal insurance policy.

[What personal information will we collect? ▶](#)

[What sensitive personal information will we collect? ▶](#)

[How will we collect your personal information? ▶](#)

[What will we use your personal information for? ▶](#)

[Who will we share your personal information with? ▶](#)

[Back to start of section](#)

[Back to top](#)

Where you are a policyholder or are covered under a HDI Ireland personal insurance policy

Our processing of your personal information ►

Where you are a policyholder or are covered under a HDI Ireland personal insurance policy ►

What personal information will we collect? ►

- General information such as your name, address, contact details, date of birth, gender and relationship to the policyholder (where you are not the policyholder).
- Identification information such as national insurance number or passport number.
- Information about your job including job title, and role and details about the industry you work in.
- Information which is relevant to your insurance policy including your details about the vehicles to be insured, and the drivers to be insured under the policy, and details of previous insurance policies and claims history. This will depend on the type of policy you hold with us.
- Information relevant to any claim or complaint you may make. This will depend on the type of claim or complaint you make.
- Financial information such as your bank details, payment details and information obtained as a result of our credit checks. This may include details of any bankruptcy orders, individual voluntary arrangements or county court judgements.
- Information (including photographs) obtained as a result of carrying out checks of publically available sources such newspapers and social media sites in the event that we suspect fraudulent activity.
- Information we obtain from sanctions and credit checks.
- Information obtained during telephone calls, or if you make a complaint.
- Any other information passed on from you, your insurance broker or someone else applying on your behalf.

[Back to start of section](#)

[Back to top](#)

Where you are a policyholder or are covered under a HDI Ireland personal insurance policy

[Our processing of your personal information ▶](#)

[Where you are a policyholder or are covered under a HDI Ireland personal insurance policy ▶](#)

[What sensitive personal information will we collect? ▶](#)

- Health Data: Physical or mental health factors relevant to the insurance application.
- Criminal convictions which are unspent under the Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016. This includes both motoring and non-motoring offences / alleged offences which you or your employees have committed, or any court sentences which you or they are subject to.

[Back to start of section](#)

[Back to top](#)

[Our processing of your personal information](#) ►

[Where you are a policyholder or are covered under a HDI Ireland personal insurance policy](#) ►

[How will we collect your personal information?](#) ►

We will collect information directly from you:

- When you apply for or renew a policy;
- When you make a claim on your policy;
- When you contact us by email, telephone and through other written and verbal communications;
- When you contact our third party claims group by telephone (please note that call recording may be used); and
- When you make a complaint.

As well as obtaining information directly from you, we will collect information from:

- The named policyholder where you are covered under the policy;
- Third parties involved in the relevant insurance policy or claim (such as our business partners and representatives, brokers or other insurers, claimants, defendants or witnesses to an incident);
- Third parties who provide a service in relation to the relevant insurance policy or claim (such as loss adjusters, claims handlers, and medical experts);
- Publically available sources such as internet search engines, news articles and social media sites;
- Other Talanx group companies;
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions);
- Our regulators including the Central Bank of Ireland and the Data Protection Commissioner;
- An Garda Síochána and other crime prevention and detection agencies;
- Third party administrators and suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers; and
- Selected third parties in connection with any sale, transfer or disposal of our business.

[Back to start of section](#)

[Back to top](#)

Where you are a policyholder or are covered under a HDI Ireland personal insurance policy

Our processing of your personal information ►
Where you are a policyholder or are covered under a HDI Ireland personal insurance policy ►
What will we use your personal information for? ►

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
To carry out fraud, credit and anti-money laundering checks .	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to prevent fraud and other financial crime). 	<ul style="list-style-type: none"> • Legal requirement relating to unlawful acts.
To evaluate your insurance application, including determining the underwriting premium price and provide you with a quote.	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to assess your insurance application and manage the application process). 	<ul style="list-style-type: none"> • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
Claims investigation/validation and handing claims made under a policy.	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to investigate and handle all claims). 	<ul style="list-style-type: none"> • Legal rights. • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.
To prevent and investigate fraud.	<ul style="list-style-type: none"> • Legal or regulatory obligations (to detect fraud). • Appropriate business need (to prevent and detect fraud and other financial crime). 	<ul style="list-style-type: none"> • Legal rights.
To comply with our legal or regulatory obligations (e.g. reporting to the Central Bank of Ireland).	<ul style="list-style-type: none"> • Legal or regulatory obligations. 	
To communicate with you and to resolve any complaints that you might have.	<ul style="list-style-type: none"> • Performance of a contract. • Appropriate business need (to send you communications, record and investigate complaints and ensure that future complaints are handled appropriately). 	<ul style="list-style-type: none"> • Legal rights. • Health information: Necessary for an insurance purpose. • Other sensitive personal information: Consent.

[continued on next page](#)

[Back to start of section](#)

[Back to top](#)

Our processing of your personal information ►
Where you are a policyholder or are covered under a HDI Ireland personal insurance policy ►
What will we use your personal information for? ►

Where you are a policyholder or are covered under a HDI Ireland personal insurance policy

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
continued from previous page		
Debt collection and cash processing.	<ul style="list-style-type: none"> Appropriate business need (to collect debt and manage cash flows). 	
To provide improved quality, training and security (for example, through monitored phone calls to our contact numbers, or monitoring user journeys on our website).	<ul style="list-style-type: none"> Appropriate business need (to develop and improve the products and services we offer). 	
To enable us to manage our business operations, such as by maintaining accounting records, carrying out analysis of financial results, using information to meet internal audit requirements, and receiving professional advice (e.g. tax or legal advice).	<ul style="list-style-type: none"> Appropriate business need (to effectively manage our business). 	
For insurance risk modelling and product and pricing refinement.	<ul style="list-style-type: none"> Appropriate business need (to develop and improve the products and services we offer). 	
To apply for and claim on our insurance.	<ul style="list-style-type: none"> Appropriate business need (to ensure that we have appropriate insurance in place). 	

Where you are a policyholder or are covered under a HDI Ireland personal insurance policy

[Our processing of your personal information](#) ►

[Where you are a policyholder or are covered under a HDI Ireland personal insurance policy](#) ►

[Who will we share your personal information with?](#) ►

From time to time, we may share your personal information between our internal departments and with companies in the Talanx group as follows:

- Via internal reports;
- Via access to central IT systems;
- Where we need to obtain a quote for you from another group company; and
- Where one of our group companies is unable to provide you with an insurance policy but another might be able to assist you.

Or with the following third parties for the purposes set out above:

- Our insurance and reinsurance partners such as brokers, other (re)insurers or other companies who act as (re)insurance distributors;
- Any agent or representative acting for you;
- Other third parties who assist in the administration of your insurance policy or claim, such as loss adjusters, claims handlers (including The Davies Group), accountants, auditors, banks, lawyers and other experts including medical experts;
- Where your policy requires us to provide insurance cover for a property(ies), risk engineers;
- Our regulators including the Central Bank of Ireland;
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers or undertake investigations in cases of suspected insurance fraud;
- An Garda Síochána and other third parties (such as banks or other insurance companies) where reasonably necessary for the prevention or detection of crime;
- Other insurers who provide our own insurance;
- Insurance industry bodies;
- Our third party services providers, such as IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers and tax advisers;
- Selected third parties in connection with any sale, transfer or disposal of our business; and
- Where necessary, courts and other alternative dispute resolution providers (such as arbitrators, mediators and the Financial Ombudsman Service).

If you would like further information regarding the disclosures of your personal information, please see the "[Contact us](#)" section below for our contact details.

[Back to start of section](#)

[Back to top](#)

Where you are a broker,
appointed representative
or other business partner

Our processing of your personal information ►
Where you are a broker, appointed representative or other business partner ►

This section will apply if you are a broker doing business with us, an appointed representative or other business partner such as an introducer or supplier.

[What personal information will we collect? ►](#)

[What sensitive personal information will we collect? ►](#)

[How will we collect your personal information? ►](#)

[What will we use your personal information for? ►](#)

[Who will we share your personal information with? ►](#)

Where you are a broker,
appointed representative
or other business partner

[Our processing of your personal information](#) ▶

[Where you are a broker, appointed representative or other business partner](#) ▶

[What personal information will we collect?](#) ▶

- General information such as your name, address, contact details, date of birth and gender.
- Information about your job such as job title, your status as a director or partner, employment history, education history and professional accreditations.
- Information which we obtain as part of checking sanctions lists.
- Other information (including publically available information) obtained as part of our due diligence checks.

[Back to start of section](#)

[Back to top](#)

Where you are a broker,
appointed representative
or other business partner

[Our processing of your personal information ▶](#)

[Where you are a broker, appointed representative or other business partner ▶](#)

[What sensitive information will we collect? ▶](#)

- Information relating to your criminal convictions (including offences and alleged offences and any court sentence or unspent criminal conviction).

[Back to start of section](#)

[Back to top](#)

Where you are a broker,
appointed representative
or other business partner

[Our processing of your personal information ▶](#)

[Where you are a broker, appointed representative or other business partner ▶](#)

[How will we collect your personal information? ▶](#)

As well as obtaining information directly from you, we will collect information from:

- Invoices, contracts, policies, correspondence and business cards;
- Other Talanx group companies;
- Publically available sources such as internet search engines; and
- From service providers who carry out sanctions and credit checks.

[Back to start of section](#)

[Back to top](#)

Where you are a broker,
appointed representative
or other business partner

Our processing of your personal information ▶
Where you are a broker, appointed representative or other business partner ▶
What will we use your personal information for? ▶

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
To comply with our legal or regulatory obligations .	<ul style="list-style-type: none"> • Legal obligations. 	
To process and pay your invoices.	<ul style="list-style-type: none"> • Performance of a contract. 	
To write insurance policies and for claims handling.	<ul style="list-style-type: none"> • Appropriate business need (to effectively write policies and manage claims). 	<ul style="list-style-type: none"> • Legal rights.
For relationship and business development purposes.	<ul style="list-style-type: none"> • Appropriate business need (relationship management and business analysis). 	
To provide improved quality, training and security (for example, through monitored phone calls to our contact numbers).	<ul style="list-style-type: none"> • Appropriate business need (to develop and improve the products and services we offer). 	
To manage and handle any queries you may have.	<ul style="list-style-type: none"> • Appropriate business need (to effectively manage our business and respond to queries). • Performance of a contract. 	
For insurance risk modelling and product and pricing refinement.	<ul style="list-style-type: none"> • Appropriate business need (to develop and improve the products and services we offer). 	
To provide marketing information.	<ul style="list-style-type: none"> • Appropriate business need (to send you selected communications about other services we offer). 	

[Back to start of section](#)

[Back to top](#)

Our processing of your personal information ►

Where you are a broker, appointed representative or other business partner ►

Who will we share your personal information with? ►

From time to time, we may share your personal information between our internal departments and with companies in the Talanx group as follows:

- Via internal reports;
- Via access to central IT systems;
- Where we need to obtain a quote for your client from another group company;
- Where one of our group companies is unable to assist you but another might be able to;
- Where we are using information for the prevention or detection of fraud or other crime; or
- Where we need to report information within our group of companies.

Or with the following third parties for the purposes set out above:

- Our insurance and reinsurance partners such as brokers, other (re)insurers or other companies who act as (re)insurance distributors, appointed representatives or other business partners;
- Other third parties who assist in the administration of the relevant insurance policy or claim, such as loss adjusters, claims handlers, accountants, auditors, banks, lawyers and other experts including medical experts;
- Our regulators including the Central Bank of Ireland;
- Insurance industry bodies and fraud detection agencies and other third parties who operate and maintain fraud detection registers or undertake investigations in cases of suspected insurance fraud;
- An Garda Síochána and other third parties (such as banks or other insurance companies) where reasonably necessary for the prevention or detection of crime;
- Other insurers who provide our own insurance;
- Credit referencing agencies and third parties who carry out sanctions checks on our behalf;
- Third parties who we have entered into contractual arrangements with to provide services we need to carry out our everyday business activities such as document management providers, back office system providers, secure login and email providers, storage warehouses, IT suppliers, actuaries, auditors, lawyers, outsourced business process management providers, our subcontractors and tax advisers;
- Third parties who handle our direct marketing on our behalf (this includes sending marketing communications, and analysis of responses to our marketing communications);
- Selected third parties in connection with any sale, transfer or disposal of our business; and
- Where necessary, courts and other alternative dispute resolution providers (such as arbitrators, mediators and the Financial Services and Pensions Ombudsman).

If you would like further information regarding the disclosures of your personal information, please see the "[Contact us](#)" section below for our contact details.

[Back to start of section](#)

[Back to top](#)

Where you are a user of
the HDI Ireland website

[Our processing of your personal information ▶](#)
[Where you are a user of the HDI Ireland website ▶](#)

If you use our website, this section will be relevant to you and sets out our uses of your personal information.

[What personal information will we collect? ▶](#)

[How will we collect your personal information? ▶](#)

[What will we use your personal information for? ▶](#)

[Who will we share your personal information with? ▶](#)

[Back to start of section](#)
[Back to top](#)

[Our processing of your personal information ▶](#)

[Where you are a user of the HDI Ireland website ▶](#)

[What personal information will we collect? ▶](#)

- General information submitted via the website, for example where you provide your details in the contact section such as your name, contact details and company name.
- Information such as IP address and browsing history obtained through our use of cookies. You can find more information about our use of cookies in our "[Website Use](#)" policy.

[Back to start of section](#)

[Back to top](#)

Where you are a user of
the HDI Ireland website

Our processing of your personal information ▶
Where you are a user of the HDI Ireland website ▶
How will we collect your personal information? ▶

- We will collect your information directly from our website.

Where you are a user of the HDI Ireland website

[Our processing of your personal information](#) ▶
[Where you are a user of the HDI Ireland website](#) ▶
[What will we use your personal information for?](#) ▶

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your sensitive personal information
To respond to any enquiries you have submitted.	<ul style="list-style-type: none">• Appropriate business need (to respond to your enquires).	
To monitor the use of and improve our website (as set out in more detail in our "Website Use" policy).	<ul style="list-style-type: none">• Appropriate business need (to monitor and improve our website).	

[Our processing of your personal information ▶](#)

[Where you are a user of the HDI Ireland website ▶](#)

[Who will we share your personal information with? ▶](#)

From time to time, we may share your personal information between our internal departments and with companies in the Talanx group as follows:

- Via internal reports;
- Via access to central IT systems; or
- Where we need to report information within our group of companies.

Or with the following third parties for the purposes set out above:

- Third parties who we have entered into contractual arrangements with to provide services we need to carry out our everyday business activities such as IT suppliers and website providers; and
- Third parties who handle our direct marketing on our behalf (this includes, for example, analysis of data received through analytics, including cookies).

If you would like further information regarding the disclosures of your personal information, please see the "[Contact us](#)" section below for our contact details.

[Back to start of section](#)

[Back to top](#)

Overseas transfers ►

Information collected and processed by HDI Ireland is stored on central HDI Global SE servers based in Hannover.

In addition we (or third parties acting on our behalf) may store or process information that we collect about you in countries outside the European Economic Area ("**EEA**"). This includes where we provide policies locally in Ireland but our referring office or network partner and claims handler is based outside the EEA, for example in the US.

Where we make a transfer of your personal information outside of the EEA we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect your personal information to adequate standards.

If you would like further information regarding the steps we take to safeguard your personal information, please contact us using the details set out in the "[Contact US](#)" section.

What marketing activities do we carry out? ►

We may use your personal information to provide you with information about products, services or events which may be of interest to you as one of our corporate partners (e.g. you are a broker).

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to opt out of marketing, you may do so by clicking on the "unsubscribe" link that appears in an email or responding to the email with the subject "unsubscribe" (we will confirm in each email how to unsubscribe) or telling us when we call you. Otherwise you can always contact us using the details set out in "[Contact us](#)" section to update your contact preferences.

Please note that, even if you opt out of receiving marketing messages, we will still send you service related communications where necessary.

How long do we keep personal information for? ►

We will only keep your personal information for the minimum periods required in order to fulfil the relevant purposes set out in this Privacy Policy. We are also required to keep certain information in order to comply with our legal and regulatory obligations.

The exact time period will depend on your relationship with us and the type of personal information we hold. For example, if you take out an insurance policy with us, we will keep your personal information for longer than if you obtain a quote from us but do not take out a policy.

Most of HDI Ireland's electronic records are managed by HDI Global SE and so are subject to the HDI Global SE retention policy.

Where HDI Ireland makes use of paper records our headline retention periods are:

Record type	Retention period
Quotes (where no policy taken out)	3 years 1 month
Policy and claims records	7 years (unless a minor)
Complaints	7 years

These are subject to some exceptions where we have a legal requirement or compelling business reason to keep them for longer.

If you would like further information regarding the periods for which your personal information will be stored, please contact us using the details set out in the "[Contact us](#)" section.

Automated processing ►

We do not currently undertake any automated decision making. We will let you know if this position changes.

Your rights ►

Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in the "[Contact us](#)" section.

Please note:

- in some cases we may not be able to comply with your request (for example, where there is a conflict with our own obligations to comply with other legal or regulatory requirements). However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.
- in some circumstances exercising some of these rights (including the right to erasure, the right to restriction of processing and the right to withdraw consent) will mean we are unable to continue providing you with insurance and may therefore result in its cancellation. You will therefore lose the right to bring any claim or receive any benefit, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

Your rights include:

[The right to access your personal information ►](#)

[The right to rectification ►](#)

[The right to erasure ►](#)

[The right to restriction of processing ►](#)

[The right to data portability ►](#)

[The right to data object ►](#)

[The right to object to marketing ►](#)

[Rights relating to automated decision-making ►](#)

[The right to withdraw consent ►](#)

[The right to lodge a complaint with the Data Protection Commission ►](#)

[Back to top](#)

Your rights ►

The right to access your personal information	<p>You are entitled to a copy of the personal information we hold about you and certain details of how we use it.</p> <p>Your information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible.</p>
The right to rectification	<p>We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.</p>
The right to erasure	<p>In certain circumstances, you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However this will need to be balanced against other factors. For example, we may have legal and regulatory obligations which mean we cannot comply with your request.</p>
The right to restriction of processing	<p>In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to use your personal information.</p>
The right to data portability	<p>In certain circumstances, you have the right to ask that we transfer personal information that you have provided to us to another third party of your choice.</p>
The right to object to object	<p>Where we rely on an appropriate business need to process your personal information you have the right to request that we stop processing your information for a particular purpose unless we can demonstrate there is a compelling business need or if it is necessary in connection with a legal claim.</p>
The right to object to marketing	<p>You can ask us to stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email that we send to you or you can contact us using the details set out in "Contact us" section Please note that even if you opt out of receiving marketing messages, we may still send you service related communications where necessary.</p>
Rights relating to automated decision-making	<p>Should we start doing so you would have the right to request human intervention in any decision.</p>
The right to withdraw consent	<p>For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.</p> <p>Please note that for some purposes, we need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy or be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent.</p>
The right to lodge a complaint with the ICO	<p>You have a right to complain to the Data Protection Commission (DPC) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations. More information can be found on the Data Protection Commission website: https://www.dataprotection.ie/. Making a complaint will not affect any other legal rights or remedies that you have.</p>

[Back to previous page](#)

[Back to top](#)

How we protect your information ►

We use a range of organisational and technical security measures to protect your information, including firewalls and access controls, which we review periodically.

We also ensure that our employees receive appropriate data security training and have in place an employee security policy.

Contact us ►

If you would like further information about any of the matters in this Privacy Policy or have any other questions about how we collect, store or use your personal information, you may contact our data protection officer by using the contact details provided below:

Data Protection Officer
HDI Global SE – Ireland
10 Fenchurch Street
London
EC3M 3BE

DPO@ie.hdi.global

Updates to this Privacy Policy ►

We may need to make changes to this Privacy Policy periodically, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. The HDI Ireland website will show the most recent version of this Privacy Policy, and you will be directed to this in our communications with you.

This Privacy Policy was last updated on: 15 June 2018