

Customer Data Privacy Notice (DPN)

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1. Identification and contact details of the Data Controller

Liberty Seguros, Compañía de Seguros y Reaseguros, S.A., (trading in Ireland as Liberty Insurance), with registered office at Dublin Road, Cavan, County Cavan, Ireland, H12 VW93, with VAT number IE9952754S, and telephone 1890 89 1890 (hereinafter “Liberty Insurance” or the “Insurer”) is the data controller for the personal data that is processed within the framework of the contractual relationship with customers, as well as through the Customer Portal and the different communication and contracting channels made available to customers by Liberty Insurance. This clause provides information on how the Insurer will use your personal data.

In addition, the purpose of this Data Privacy Notice is to provide information on the processing of personal data and the rights under the General Data Protection Regulation (“GDPR”) to customers, to those who have requested a



quote, insured persons, policyholders, to those who are involved in a claim, as well as to anyone acting on their behalf, including when they file a claim, exercise a right or participate in contests and raffles organized by Liberty Insurance.

Liberty Insurance has a Data Protection Officer appointed before the Data Protection Commission, who can be contacted at the following address DataProtectionOfficer@libertyinsurance.ie. If you have any questions regarding the processing of your personal data, please contact the Data Protection Officer at the aforementioned address.

2. General information: description of the information contained in the Data Privacy Notice.

In this Data Privacy Notice you will find tables identifying each of the different services offered by Liberty Insurance.

These informative tables will detail:

- The purposes of the processing of your personal data, i.e. the reason why Liberty Insurance processes your personal data.
- The legal basis that allows the processing of data by the Insurer for each of the purposes indicated.
- The possible communication of your data to third parties, as well as the reason for such communication. For these purposes, we do not transfer your personal data to third parties except when there is a legal obligation to do so (Tax Authorities, Judges and Courts, Security Forces and Bodies...), or for communicating them to other companies of the Liberty Mutual Group for internal administrative purposes, never for



commercial purposes, or when we expressly indicate it in the table that appears below. On the other hand, Liberty Insurance data processors may have access to your personal data, i.e. service providers that have access to your personal data for the performance of their services. The service providers who will have access to your personal data would be, in general, information system service providers, technological and telecommunication service providers, cloud computing and network security service providers, anti-fraud service providers, finance and billing service providers, private investigators, claims management general agents (MGA's), reinsurers, professional service providers (including solicitors and barristers) or customer service providers. The table below will indicate those other areas where Liberty Insurance service providers may have access to your data from time to time. You can request more detailed information about the recipients of your data by sending an e-mail to the address DataProtectionOfficer@libertyinsurance.ie, indicating the specific processing activity about whose recipients you would like information.

- The existence of potential international data transfers. For these purposes, much of our processing activities require international data transfers to technological service providers or entities of the group to which Liberty Insurance belongs, located in the United States, United Kingdom, India, Colombia, Brazil, Australia, Malaysia and Canada, for which the pertinent Standard Contractual Clauses apply, or the recipient country is recognized as providing adequate safeguards. You can request more detailed information regarding the international transfers of your data or the guarantees applied by sending an e-mail to DataProtectionOfficer@libertyinsurance.ie, indicating the specific processing activity about which you would like to receive information about the guarantees applying.
- The retention period of the data you provide us with. For this purpose, we



keep your personal data for the duration of the contractual relationship, or for a longer period if you have given us your consent. Subsequently, your data will remain blocked to deal with judicial, administrative or tax claims, during the statutory limitation period determined by the applicable regulations.

3. Necessary, up-to-date and accurate information

Liberty Insurance will process personal data, including health data, provided directly by the interested party or obtained by other lawful means. Data may be received from third parties, such as lawyers, experts, insurance companies, clinics and hospitals, among other entities whose information must be communicated to Liberty Insurance. In addition, the personal data subject to processing may refer to the policyholder, insured parties, third-party claimants, representatives, witnesses and others.

The personal data processed can be found among the non-exhaustive list of the following categories: identification data (for example, name, gender, Social Welfare number, car plate...) including voice and/or image, location data (for example , address, eircode, postal code...), financial data or bank data - depending on the policy purchased- (for example, bank account number, credit/debit card number...), metadata (for example, IP address,...), data of the policy (for example, policy number, insured property, historical data related to the policy, health data...), claims data (for example, accident information, photographs, health data,...) and data for fighting against fraud and money laundering (for example, criminal records...).



You are required to provide us with the data we request through various means of collection, including the digital portals of Liberty Insurance, email, telephone or paper. If you do not provide us with all information requested, we may not be able to send you communications or provide you with the insurance related services you have requested. Likewise, by fulfilling and sending the required information, you declare that the information and data you have provided is accurate and true.

So that the information provided is always up to date and contains no errors, you must inform Liberty Insurance, as soon as possible, on the changes and corrections of your personal data that may occur, using the form you will find at the following link.

4. Exercising your rights

You can exercise the following rights:

1. right of **access** to your personal data to find out if it is being processed, and if so, what exactly is being processed and the specific processing activity that is being carried out, including the purposes, categories of data processed and recipients, among other information;
2. right to **rectification of** any inaccurate personal data;
3. right of **erasure** of your personal data when, among other reasons, it is no longer necessary for the purposes for which it was collected, and provided that the legal basis that enables us to process it, from among those indicated in the second column of the table included in section 5, is not a legal obligation;



4. right to **object** to the processing of your personal data, provided that the legal basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is the legitimate interest of Liberty Insurance or a third party. Liberty Insurance will stop processing your data unless a compelling or higher legitimate interest for the processing is proven, or in case they are simply kept blocked for the formulation, exercise or defence of claims;
5. the right to request the **restriction** of the processing of your personal data where the accuracy, lawfulness or necessity of the data processing is in question, in which case we may retain the blocked data for the exercise or defence of claims;
6. the right to **portability** of your data, i.e. to receive your personal data in a structured, commonly used and machine-readable format, in order to transmit them to you or to another data controller, provided that the legal basis that enables us to process it, from among those indicated in the second column of the table in [section 5](#), is the existence of a contractual relationship or your consent;
7. the right not to be subject to **automated** decisions that may effect on your legal rights, or that significantly affect you and when such decisions are being made;
8. right to revoke the **consent** given to Liberty for the processing of your data, provided that the legal basis that enables us to process your data, from among those indicated in the second column of the table included in [section 5](#), is your consent.



You can exercise your rights at any time and free of charge through the form you will find at the following [link](#).

In addition, you have the right to lodge a complaint with Liberty Insurance or the Data Protection Commission if you believe that there has been a breach of data protection legislation in relation to the processing of your personal data.

5. Detailed information on the processing carried out:

5.1 If you have requested a quote, you are insured, a policyholder or you are involved in a claim:

Purpose of the processing	Legal basis	Recipients
<p>Provide support and respond to customer requests received through the different contact channels made available to them (telephone, email, social networks, instant messaging applications and the Customer Portal), as well as manage contracts, payments, quotes, renewals, cancellations, reimbursements and any other service that customers may request, including changes, supplements, green cards or requests for information, among others.</p> <p>To fulfill these purposes, it may be necessary to carry out actuarial calculations to determine the insurance premium, the renewal price and the technical reserves. Actions to defend and clean up the portfolio may also be carried out.</p>	<p>Depending on the specific case: (i) Liberty Insurance's legitimate interest calculating the insurance premium and prevent fraud; (ii) Management of the contractual or pre-contractual relationship.</p>	<p>Your data may be transferred within the framework of this processing to banks, external auditors, lawyers, brokers, social networks, reinsurers and sectorial associations.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, are communication service providers, information storage service providers, digital signature service providers, and the common databases of the insurance sector and claim records databases.</p>



<p>Manage customers from the brokers' network, changes in broker position, portfolio transfers and reinsurance, among others, through Liberty Insurance digital channels or instant messaging applications at the request of the broker. Among these purposes is the updating of customer contact data and the classification of the documentation sent and received.</p>	<p>Depending on the specific case: (i) Liberty Insurance's legitimate interest in managing its portfolio of customers and brokers in an efficient and agile way; (ii) Management of the contractual or pre-contractual relationship.</p>	<p>Your data may be transferred within the framework of this processing to brokers and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs. The categories of service providers that may have access to your data, in addition to those listed in section 2, are communication service providers, information storage service providers, administrator service providers and digital signature service providers.</p>
<p>To manage tax returns and refunds, as well as possible seizure requests, attempts to recover from private entities, manage indemnities and compensation in the event of a claim, as well as prevent defaults and initiate legal actions in the event of arrears.</p>	<p>Compliance with a legal obligation to which Liberty Insurance is subject.</p>	<p>Your data may be transferred within the framework of this processing to any official body or public authority, other insurance companies, lawyers, collection agencies and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs. The categories of service providers that may have access to your data, in addition to those listed in section 2, would be communication service providers, administrator service providers, consultancy and legal advice service providers.</p>



<p>Extract, create and manage information to prepare reports, files or databases, with financial, actuarial, claims or other information, as required by the corresponding Authorities. As well as manage the requests from official bodies, coordinate legal actions, trial and pre-trial procedures initiated by (or against) Liberty Insurance.</p>	<p>Compliance with a legal obligation to which Liberty Insurance is subject.</p>	<p>Your data may be transferred within the framework of this processing to any official body or public authority, auditors, lawyers and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, would be call recording service providers.</p>
<p>Marketing campaigns, cross-selling, promotion of Liberty Insurance products and brand, loyalty programs and rewards agencies, information on bonuses for referring family and friends, congratulations on special occasions, newsletters or other sponsorships, information on events, sending information on offers and incentives through the elaboration of commercial profiles. These campaigns can be carried out through emails, calls, SMS, search engines, social networks and involve automated processing for monitoring.</p>	<p>Depending on the specific case: (i) Liberty Insurance's legitimate interest in sending commercial communications that may be of the interest of customers; (ii) Consent.</p>	<p>Your personal data will be transferred on the basis of this processing and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, are communication service providers, marketing and mail service providers.</p>
<p>Management of Liberty's social networks, the content published on them and the interactions with customers and users.</p>	<p>Liberty's legitimate interest in positioning its image on social networks and interacting with customers and users through them.</p>	<p>Your personal data will be transferred on the basis of this processing social network service providers.</p> <p>The categories of service providers that may have access to your information are those listed in section 2.</p>



<p>Service quality surveys and loyalty to Liberty Insurance products sent via email, SMS or telephone.</p>	<p>Legitimate interest of Liberty Insurance in making strategic and business decisions, as well as improve the services provided, for which the responses to the surveys will be used.</p>	<p>Your personal data will be transferred on the basis of this processing and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs. The categories of service providers that may have access to your information, in addition to those listed in section 2, would be survey service providers.</p>
<p>To develop insurance products, analyse, monitor and plan results and productivity for strategic decision making and to ensure that the procedures and initiatives of Liberty Insurance are aligned with the applicable internal and national regulations and comply with all quality standards. It may include the creation of pricing, risk and demand profiles and models, for statistical and actuarial purposes that make it possible to assess risks, predict fraud, evaluate the evolution of claims, the profile of the customer's suitability for the product and determine the premium for the insurance, as well as geocoding services to calculate the premium and improve predictive models.</p>	<p>Depending on the specific case: (i) Liberty Insurance's legitimate interest in determining the risks and costs associated with contracting a product; in predicting and estimating aspects of their business; in improving its products and processes, carrying out decision-making; and to ensure that all procedures meet the established quality standards; (ii) Management of the contractual relationship.</p>	<p>Your data may be communicated within the framework of this processing to reinsurers, external auditors, associations of the insurance sector, insurance regulators and supervisors and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs. The categories of service providers that may have access to your information in addition to those listed in section 2, are consultancy service providers, survey service providers and asset solvency databases.</p>



<p>Investigate, detect and prevent fraud, as well as cases of high claim rate, for which information of the interested parties will be consulted in the common databases of the insurance sector and in capital solvency databases, at the time of the conclusion of the contract, during its validity and after its resolution. Likewise, it also seeks to prevent and detect identity and civil status fraud.</p>	<p>Legitimate interest of Liberty Insurance supported by legal authorization to prevent and detect insurance fraud and to avoid identity fraud of its customers.</p>	<p>Your personal data will be disclosed to public authorities, other insurers, lawyers and insurance sector associations on the basis of this processing.</p> <p>The categories of service providers that may have access to your data are, in addition to those listed in section 2, claims investigation service providers, asset solvency databases and the common databases of the insurance sector.</p>
<p>To make back-up copies of systems, maintain the business continuity plan, the security breach management policy, the information access control policy, as well as to control the traffic of information entering/leaving the Insurer's systems. Applications and projects will also be developed, helping to detect possible failures in the systems and solving them. Use analytical tools for security diagnostics and development of infrastructures and applications, including monitoring and alerts on the use of digital channels, as well as their communication to network and information security service providers.</p> <p>Likewise, part of this purpose is to host the data and documentation in the cloud, manage the transfer of information through the technological framework of Liberty Insurance, as well as control the information traffic that enters/exits the Insurer's systems, including the classification, digitization and custody of the company's physical documentation.</p>	<p>Depending on the specific case: (i) Liberty Insurance's legitimate interest in guaranteeing cybersecurity, information security, the performance of applications and the improvement of the services provided, including the fight against fraud; (ii) Fulfilment of a legal obligation.</p>	<p>On the basis of this processing, your personal data will be transferred to entities of the group and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs of customer data.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, communication service providers, couriers, and information storage service providers.</p>



<p>Deal with claims from any of Liberty Insurance lines of products, including motor, home, commercial, industrial, life and pension funds, among others, whether or not involving bodily injury. Carry out the corresponding evaluation of the damages, the previous investigation about them to make sure that there is no fraud, as well as the management of the network of service providers in the framework of claims and the communication of data to said providers for this purpose, and the payments of the corresponding indemnities and medical assistance, as the case may be, including to injured third parties. In order to speed the management of these claims, they may be processed through insurance sector conventions. Call recording may be carried out to improve the user experience.</p>	<p>Depending on the specific case: (i) Liberty Insurance's legitimate interest to improve customer experience; (ii) Management of the contractual relationship to verify the transactions made.</p>	<p>Your data may be communicated within the framework of this processing to any official body or public authority, lawyers, other insurance companies, reinsurers, brokers and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs.</p> <p>The categories of service providers that may have access to your information, in addition to those listed in section 2, communication service providers, information storage service providers, administrator service providers and the common databases of the insurance sector.</p>
<p>Call recording for the purpose of quality control, monitoring the service provided, improving the performance of agents, training agents, improving customer experience, and as a means of proof of the existence and veracity of commercial transactions and queries made.</p> <p>This is based on a telecommunications infrastructure and of electronic and telephone communications that guarantees business continuity.</p>	<p>Depending on the specific case: (i) Liberty Insurance's legitimate interest to improve the quality of service, ensure implementation of its policies and improve the customer experience; (ii) Management of the contractual relationship to verify the transactions made.</p>	<p>Your personal data will be transferred on the basis of this processing to the parent and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, would be call recording service providers.</p>



<p>Video surveillance and access control at the various Liberty Insurance headquarters to ensure the safety of people and property and the Insurer's premises, as well as for the prosecution of crimes, where appropriate.</p>	<p>Liberty Insurance's legitimate interest in ensuring the security of its facilities.</p>	<p>The categories of service providers that could access your data, in addition to those indicated in section 2, would be control, security and video surveillance service providers.</p>
<p>To carry out internal and/or external audit processes and ensure the company's regulatory compliance.</p>	<p>Legitimate interest of Liberty Insurance based on legal authorization and to guarantee compliance with internal procedures.</p>	<p>Your personal data will be transferred on the basis of this processing to any official body or public authority, external auditors, lawyers and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs. The categories of service providers that may have access to your information, in addition to those listed in section 2, would be consultancy and legal advice service providers.</p>
<p>To carry out relevant actions and investigations to prevent money laundering and the financing of terrorism. It includes the prevention of transactions with internationally sanctioned parties. Complaints made through the Insurer's ethics line are taken into consideration.</p>	<p>Depending on the specific case: (i) compliance with a legal obligation to which Liberty Insurance is subject; (ii) Legitimate interest of Liberty Insurance in preventing money laundering and the financing of terrorism.</p>	<p>Your personal data will be transferred on the basis of this processing to the parent company of the group and to Liberty Mutual, the parent company of the group to which Liberty Insurance belongs well as to external auditors or public authorities. The categories of service providers that may have access to your data in addition to those indicated in section 2, would be database service providers and service providers fighting against money laundering.</p>



5.2 If you have filed a claim or exercised a right before Liberty Insurance, the Insurer may process your data for the following purposes:

Purpose of the processing	Legal basis	Recipients
<p>Complaints and queries about the service: to deal with complaints through the corresponding electronic form provided for this purpose, by telephone, by post, by e-mail or through instant messaging applications. In the event you contact us by phone, your call may be recorded.</p>	<p>Depending on the specific case: (i) Legal obligation to attend to customer or interested parties' complaints ; and (ii) Legitimate interest in attending to complaints and queries.</p>	<p>Your personal data will be transferred on the basis of this processing to the official body, ombudsman or public authority involved in the complaint submitted. Access shall be provided to service providers in addition to those indicated in section 2, which shall be customer service providers, transcription and call recording service providers.</p>
<p>Complaints and queries about the service: to respond to complaints regarding privacy and exercise of rights of access, rectification, erasure, objection, restriction and portability through the corresponding electronic form provided for this purpose, by telephone or email. As well as manage your requests to unsubscribe from commercial communications. In the event you contact us by phone, your call may be recorded.</p>	<p>Legal obligation to attend to complaints regarding privacy or exercise rights of access, rectification, erasure, objection, restriction and portability raised by service providers, customers or any other interested party whose personal data has been processed by Liberty Insurance.</p>	<p>Your personal data will be transferred on the basis of this processing to to the Data Protection Commission on the basis of this processing if the complaint is received by the Data Protection Commission. Access shall be provided to service providers additional to those indicated in section 2, which are providers of call recording services.</p>



5.3 If you have participated in a contest or raffle:

Purpose of the processing	Legal basis	Recipients
Participation in contests and raffles organized by Liberty Insurance.	Consent.	Access shall be provided to service providers additional to those indicated in <u>section 2</u> , which are communication service providers.

6. Confidentiality

The personal data that we may collect through our websites, portals, forms, contact mailboxes, as well as through the various electronic or telephone communications that we maintain with you or your representative will be processed confidentially by Liberty Insurance, with Liberty Insurance pledging to keep these secret in accordance with the provisions of applicable Law.

7. Update of the Data Privacy Notice

This Data Privacy Notice may need to be updated. It is therefore necessary that you review this Data Privacy Notice periodically and, if possible, every time you contact us, or access the Liberty Insurance website <https://www.libertyinsurance.ie/about-us/customer-information/general-data-protection-regulation-gdpr>, in order to be properly informed about the type of information collected and its processing. You can find the Data Privacy Notice on the Liberty Insurance Link. Notwithstanding the foregoing, we shall notify you of any changes to this Data Privacy Notice that affect the processing of your personal data by means of a notice on the respective Customers' Portal. This Data Privacy Notice is effective as of September 2022.

