

Privacy Statement

Introduction

KennCo Underwriting Ltd is committed to respecting and protecting your right to privacy and complies with our obligations under the EU General Data Protection Regulation (“GDPR”). This privacy statement will inform you of the information we gather and how it is used. KennCo maintains the same privacy practices with respect to data that is collected off-line and this statement also covers those methods of data collection and use.

Who we are

KennCo Underwriting Ltd., with an address of - suites 5-7, Grange Rd Office Park, Grange Rd, Rathfarnham, Dublin 16, is Ireland’s largest independently owned Underwriting Agency. We deal directly with consumers and through regulated intermediaries on a wide range of non-life insurance products in Ireland. We currently have a distribution network of over 500 intermediaries nationwide.

How We Protect You & Your Information

KennCo Underwriting Ltd (‘we’ ‘us’ ‘our’, as referenced in this data protection statement) is the registered data controller in relation to personal information held about you for the purpose of the GDPR. The information that you provide and any other information provided by any third party in connection with or in relation to your application will be held by us on a computer database and/or in any other way.

We abide by the GDPR. If you have any queries or complaints with regards to how we use your personal data please contact us on the below details:

Data Protection Officer

Compliance Department,
KennCo Underwriting Ltd.,
Suites 5-7,
Grange Road Office Park,
Grange Road,
Rathfarnham,
Dublin 16,
E-mail: compliance@kennco.ie

You have the right to make a complaint with the Office of the Data Protection Commissioner. Their contact details are as follows:

Data Protection Commissioner

21 Fitzwilliam Square South,
Dublin 2,

D02 RD28,
Ireland
Telephone: +353 (01) 7650100
Lo Call Number: 1800437 737
On-line: www.dataprotection.ie

The Purposes, Categories, Legal Grounds and Recipients, of Our Processing of Your Personal Data

We collect and may continue to collect certain information about you or any individuals connected to your policy ('data subjects') in the course of our relationship with you for the performance of your insurance contract, compliance with a legal obligation, legitimate interests (to ensure that the client is within our acceptable risk profile) and to assist in the prevention of crime and fraud. This information will be processed for the purpose of underwriting and managing your insurance policy and administering claims. It may also be used in compliance with regulatory legal and tax laws and for participation in internal or market-level statistical exercises. For this purpose, information may be shared in confidence with third parties both inside and outside the European Economic Area such as trustees, professional advisers and reputable external agencies, service providers, regulatory bodies and authorities, private investigators, other insurance and financial services companies (directly or via a central register) and as required by law. We will ensure that transfers of data are lawful and that your information is kept securely and only used for the purposes for which it is provided.

We may check the information you provide against other information available to the public (such as court judgements). If you give us false information or fail to disclose information and we suspect fraud, we will record this. We may share information about you with industry databases such as those operated by Insurance Ireland for the purpose of sharing information among insurance companies as a check against non-disclosure and to assist in preventing, detecting and/or protecting our customers and ourselves from fraud. We may also search fraud prevention agencies and databases to:

- Help make decisions about provision and administration of insurance, credit and related services for you
- Trace debtors or beneficiaries, recover debt, prevent fraud and to manage your accounts or insurance policies
- Check your identity to prevent money laundering, unless you furnish us with other satisfactory proof of identity
- Undertake credit searches and additional fraud searches

We also record telephone conversations for verification and training purposes.

Consent

It may be necessary for us to collect sensitive data (such as medical conditions or criminal convictions) relating to you and others names on the insurance policy. Please do not send us any generic test results. Your consent to this processing may be necessary and it is your responsibility to get consent from the other people named on your policy before sharing their

sensitive information with us. You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.

Insurance Link Database

Information about claims (whether by our customers or third parties) made under policies that we provide is collected by us when a claim is made and is placed on an insurance industry database of claims known as Insurance Link. This information may be shared with other insurance companies, self-insurers or statutory authorities.

Insurance companies share claims data to:

- Ensure that more than one claim cannot be made for the same personal injury or property damage
- Check the claims information matches what was provided when insurance cover was taken out
- Act, when required, as a basis for investigating claims when our recorded information is incorrect or when we suspect that insurance fraud is being attempted

The purpose of Insurance Link is to help us identify incorrect information and fraudulent claims and, therefore to protect you and all of our customers. Guidelines for sharing your information with other insurance companies, self-insuring organisations or statutory authorities are contained in the Data Protection Commissioner's Code of Practice on Data Protection for the insurance section which is available at www.dataprotection.ie.

Your Rights

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

Right of access – you have the right to request a copy of the information that we hold about you.

Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

Right of portability – you have the right to have the data we hold about you transferred to another organisation.

Right to object – you have the right to object to certain types of processing such as direct marketing.

Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why.

You are entitled to know whether we hold information about you and, if we do (subject to certain limitations), to have access to that information and have it corrected if it is inaccurate or out of date, restriction of processing, objection to processing and to data portability.

To exercise your Right of Access or to update your details under your Right of Rectification or Erasure, contact The Data Protection Officer KennCo Insurance, Suites 5-7 Grange Road Office Park, Grange Road, Rathfarnham, Dublin 16. Alternatively, by e-mail at compliance@kennco.ie

In order to ensure that we are satisfied about the identity of the person making the request so we do not disclose your personal data to a party who is not entitled to it under the GDPR, the person making the request will need to provide KennCo Insurance with their name, address(es), date of birth and any policy IDs/numbers that they have along with a copy of their photo identification.

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

Profiling and Automated Decision-Making

We use profiling and automated decisions-making as follows:

We use the information that you provide to us, including your claims history and other factors to ensure premiums reflect risk and to understand fraud patterns. Where special categories of personal data are relevant, such as past motoring convictions for motor insurance, your special categories of personal data may also be used for profiling.

We may also send your address details to a third party contractor to determine information about the area in which you live in order to determine any risks, such as a flood risk near your property. This information will be used to determine a risk rating and will be applied to your risk profile to calculate your premium.

Underwriting is the process by which an insurance company examines, accepts or rejects risks and classifies those selected, in order to charge an appropriate premium for each. The underwriting factors that must be evaluated to complete the underwriting process depend on the insurance product the customer is interested in; each product requires different categories of information to assess the risk profile of the applicant. We analyse an applicant's data to assess the risk they wish to cover, and we charge a fair insurance premium based on that analysis. We use an algorithm or internal model, which use complex mathematical and actuarial methods of calculating and pooling risk, for insurance underwriting purposes. The algorithm and internal models are KennCo confidential intellectual property and business know-how. As a result we cannot provide any further details of how they work.

Where we use automated decision making which produces legal effects for you or otherwise significantly affects you, you will have the right to obtain human intervention and to contest and make representations in relation to the decision in question.

Types of Information Collected

We retain two types of information:

“Personal Data”

This is data that identifies you or can be used to identify or contact you and may include your name, address, email address, user IP addresses in circumstances where they have not been deleted, clipped or anonymised, telephone number. Such information is only collected from you if you voluntarily submit it to us.

“Non-Personal Data”

Like most websites, we gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This Non-Personal Data comprises information that cannot be used to identify or contact you, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymised, browser types and other anonymous statistical data involving the use of our website.

Purposes for Which We Hold your Information

Non-Personal Data

We use the Non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us better design and organise our website.

Personal Data

We will process any Personal Data you provide to us for the following purposes:

- to provide you with the accommodation or services you have requested;
- to contact you if required in connection with your request or to respond to any communications you might send to us;
- to inform you of any special offers we might periodically have available

Disclosure of Information to Third Parties

We will not disclose your Personal Data to third parties unless you have consented to this disclosure or unless the third party is required to fulfil your order (in such circumstances, the third party is bound by similar data protection requirements). We will disclose your Personal Data if we believe in good faith that we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

Retention of Data

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

Sale of Business

We reserve the right to transfer information (including your Personal Data) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of the Website Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

Security

Your Personal Data is held on secure servers. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your Personal Data.

Cookies

Cookies are tiny text files that are stored on your computer, tablet or mobile phone when you visit a website in order to help the website work efficiently, to help us analyze the way our website works and how we can improve it, and to ensure that the website functions to the optimum.

For more details on KennCo cookies and how to manage your cookie settings on our website see our [cookie policy](#) information.

Changes to the Website Privacy Policy

Any changes to this Website Privacy Policy will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Privacy Statement, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.

KennCo Underwriting Ltd is regulated by The Central Bank of Ireland.

This privacy statement was last updated on the 19th May 2022

