

## **KBC Gadget Insurance**

### **Privacy Statement**

#### **KBC, Mobilecover and Zurich**

KBC Bank Ireland plc ("KBC") has an exclusive agency agreement with Zurich Insurance plc ("Zurich") for the provision of gadget insurance while the products themselves are administered by Mobilecover Ltd ("Mobilecover"). In offering and providing you with KBC gadget insurance services, each of KBC, Zurich and Mobilecover will process personal data. The purpose of this Privacy Statement is to explain to you how your data will be used, retained and disclosed by each of the parties.

#### **Privacy Statement**

KBC, Mobilecover and Zurich are committed to protecting your privacy. Please read this Privacy Statement so that you understand how KBC, Mobilecover and Zurich will process and protect personal information that is provided by you in your application form, together with any other information that is furnished in connection with any application for gadget insurance or your customer account ("Customer Data"), the circumstances in which it may be disclosed, the choices you have regarding the use of your information and your ability to correct inaccurate Customer Data.

#### **Collection and Use of Customer Data**

Each of KBC, Mobilecover and Zurich ("we") use Customer Data for the provision and administration of insurance products and related services. Examples of the actual or possible uses of your Customer Data are: processing and assessing your insurance application(s), administering your account, processing claims, statistical analysis, underwriting purposes, verifying the Customer Data and otherwise meeting our legal and compliance obligations (which include those relating to the prevention of money laundering, financing of terrorism and fraud prevention, quality control and group reporting and management, risk management and provision of advice and if you have consented, for marketing purposes). This processing of information applies to both our online and off line work practices.

If you have consented, your Customer Data may also be used by KBC and carefully selected third parties to provide you with information about other products and services. These may be offered by KBC itself or they may be arranged for you by KBC with other companies within the KBC Group. KBC operates a strict opt-out policy, such that all direct marketing material contains the option to opt-out of future direct marketing. Furthermore, you may opt-out at any time by writing to the Data Protection Office at the address mentioned below.

You may be required to provide us with sensitive personal data e.g. information relating to your physical or mental health, the commission or alleged commission of offences, information relating to the prosecution of offences etc ("Sensitive Data"). Sensitive Data will only be obtained and processed where necessary to process your application, administer your account, investigate claims or to comply with applicable law.

By providing your Customer Data to us you indicate your explicit consent to the collection, storage, processing, disclosure and use of your Customer Data in the manner described in this Privacy Statement. You acknowledge that if you do not consent to such processing, it will not be possible to provide you with certain services or products. You should also note that your consent is not necessary where the processing of Customer Data is required to investigate fraud or other offences or to comply with a legal obligation.

### **Disclosure of Customer Data**

We consider your Customer Data to be private and confidential. We may disclose information about you to agents, advisers, service providers, replacement underwriters or other contractors appointed by us or to regulatory bodies or other insurance companies (directly or via a central register as explained further below). We may share Customer Data with other companies within the KBC, Mobilecover or Zurich Groups and with our partners (both inside and outside of the European Economic Area) but only where this is connected to the provision of services to you. We may access and/or disclose your Customer Data if required to do so by law or where we have a good faith belief that such action is necessary to: (a) conform with the law or comply with legal process served on us; (b) protect and defend the rights or property of KBC, Mobilecover or Zurich including, without limitation the security and integrity of our network; or (c) act under pressing circumstances to protect the personal safety of users of our services or members of the public.

### **Access to and Rectification to your Customer Data**

You are entitled to copies of your Customer Data held by KBC, Mobilecover or Zurich where they hold your data as a data controller. A copy of the Customer Data which is kept by KBC, Mobilecover or Zurich (if any) will be provided within 40 days after receiving a request in writing to the relevant contact point set out below. To access your data, a fee of €6.35 is chargeable under the terms of the Data Protection Acts and cheques should be made payable to the data controller to whom you send the request. You may be required to provide sufficient information to verify your identity and to help locate your data. If you identify that the information held about you is inaccurate, the necessary amendments will be made and confirmed to you within 40 days of receipt of your request.

### **Retention of Customer Data**

Your Customer Data will be retained by KBC. Mobilecover and by Zurich for as long as necessary for the purposes of providing insurance products and related services to you. Customer Data may be retained thereafter for legal and regulatory compliance purposes and, where KBC has your consent, for future marketing purposes.

### **Use of Cookies**

"Cookies" are small text files sent from a website to the hard drive of a user's computer to store bits of information related to that user. Cookies can store information about users, including IP addresses, navigational data, server information, data transfer times, user preferences, and passwords needed to access the special areas on our site. KBC and Mobilecover use cookies for the purpose of storing and retrieving session information in our on-line quote systems, and for analysing traffic on the KBC Gadget Insurance website. No Customer Data or Sensitive Data is stored in the cookies. There are two types of cookies used on the KBC Gadget Insurance website:

#### **Session Cookies**

These are temporary cookies that remain in the cookie file of your browser until you close the browser. We use these cookies to manage our communication during the users 'session' on the site. They are used to carry relevant information across different pages on our site so as to avoid you having to re-enter information. They are also used to manage secure communications via SSL in the secure login area of the website so that the user system knows it is communicating securely with us. If you are signing into the secure login area of the website, you are required to input a personalised Username, Password and PIN. This information is used to identify user activity in the secure area and used only as part of aggregate statistics. These cookies do not contain personal information from which you can be identified.

#### **Persistent Cookies**

These cookies will remain in the cookie file of your browser even after you have left the KBC Gadget Insurance website (depending on the specific cookie). We use these cookies to assign a unique user number so that we can track how many times a visitor comes to the site, how long the visit is, the location that the visitor accessed the website from, what links were clicked on and what keywords were used.

We do not use electronic images known as Web beacons on the KBC Gadget Insurance website or e-mails. We do not use third party cookies. Your continued use of the service constitutes your agreement to this Privacy Statement and any updates.

#### **Enabling/Disabling Cookies**

Most browsers automatically accept cookies. You have the ability to accept or decline cookies or request that you be warned when a website is trying to install a cookie. This can be done by modifying the settings in your browser. Please note that disabling cookies may affect the functionality of some parts of this website.

### **Software Quality**

We do not warrant that any information, software or other material accessible through this site is free of viruses, worms, Trojan horses or other harmful component. We assume no responsibility and shall not be liable for any direct, indirect, incidental or consequential damages that result from the use, access to, browsing in or downloading of any information, data, text, images or other material accessible through the KBC Gadget Insurance site or the website of any linked third party

### **Security of Customer Data**

KBC, Mobilecover and Zurich are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your Customer Data from unauthorised access, alteration, use, disclosure, accidental loss or destruction. For example, we store the personal information you provide on computer systems with limited access, which are located in controlled facilities. When we transmit highly confidential information (such as a credit card number) over the internet, we protect it through the use of encryption and secure servers. As effective as modern security practices are, we cannot guarantee the complete security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet. We will continue to revise policies and implement additional security features as new technologies become available.

### **Changes to the Privacy Statement**

This Privacy Statement may change from time to time at our sole discretion. Material changes will be notified to you or posted on the KBC Gadget Insurance website. By continuing to use the site or our gadget insurance services after we post any changes, you accept and agree to this Privacy Statement, as modified.

### **Electronic Communications and Phone Calls**

Your information will be processed, recorded and retained by KBC, Mobilecover, Zurich and our agents, advisors, service providers, insurance underwriters and subcontractors in electronic form. You agree that KBC, Mobilecover and Zurich may communicate with you electronically in relation to your accounts, and that we may rely on such electronic communications, records, originals and documents in any dealing with you. We may monitor and record telephone calls made to and from us for fraud and

crime prevention, to assist in improving customer services, to evidence instructions or to prevent or resolve disputes.

### **Contacting Us**

If you have any comments, queries or suggestions about our Privacy Statement or the level of security practices, or you wish to change, modify, update or remove your Customer Data, contact us:

For data protection queries relating to the administration of your KBC Gadget Insurance policy contact:

- Data Protection Officer, Mobilecover Ltd, PO BOX 11140, Dublin 2.

For data protection queries relating to KBC's use of your data contact:

- The Marketing Department, KBC Bank Ireland plc, Sandwidth Street, Dublin 2 or e-mail [marketing@kbc.ie](mailto:marketing@kbc.ie)