



Data Protection – How We Handle Your Personal Information
Assurant Europe Insurance N.V. (part of the Assurant, Inc. group companies), with registered address at Paasheuvelweg 1, 1105 BE Amsterdam, The Netherlands, registered in the trade register of the Dutch Chamber of Commerce under number 72959320 and registered with the Dutch supervisor, De Nederlandsche Bank N.V. (Dutch Central Bank) under number R161237, is committed to preserving the privacy of its customers in accordance with the applicable data protection law, and the Code of Conduct on the Processing of Personal Data Insurance Companies. Please read the following privacy notice to understand how we, as a data controller, collect, use and protect the personal information that you (“Policyholder” or “you”) provide to us for purposes of providing the insurance policy (“Policy”) to you.

Personal information that we collect from you We (or our service providers on our behalf) collect and use the following personal information from you as part of providing your Policy to you:

- Name and contact details (e.g. postal address, telephone number, mobile number, email address);
- Policyholder information (e.g. policy number, certificate number, billing and payment history);
- Claims information (claim number, date of loss and reason, call history, loss details, police reference number and supporting documentation);
- Covered device information (e.g. make, model, serial number, IMEI);
- Records of any correspondence regarding any specific enquiry; and
- Feedback that you provide on our services (including through customer experience surveys).

You can choose whether you provide this information to us. It may be that we will be unable to provide specific services under this Policy to you if you do not provide certain information to us.

How we use your personal information We’ll process personal information for our legitimate interests, when we have a business reason to do so, this information is intended to be used by Assurant Europe Insurance N.V. for the following purposes:

- Performance of our obligations under the Policy and provision of the benefits under this Policy and including claims management. We use your information for these purposes where necessary for the performance of your contract of insurance with us.
- For statistical analysis, customer experience surveys (where permitted and in compliance with applicable laws), performing internal administrative functions, handling customer enquiries, managing customer relationships and evaluating the appropriateness of this Policy and its benefits. We use your information for these purposes where necessary for pursuit of our legitimate interests (monitoring and improving our offerings and our customer experience and administering our internal processes) in line with our balancing tests. For more information on our legitimate interests and our balancing tests you can contact us using the contact information below.
- Risk evaluation and management (including operational risk), debt recovery, fraud and payment default prevention and evidence management. We use your information for these purposes where necessary for pursuit of our legitimate interests (protecting our business from fraudulent activity and recovering sums due).
- Anti-money laundering, anti-terrorism efforts and sanctions screening. We use your information for these purposes where necessary for compliance with our legal obligations.

Are automated decisions made using personal information? We use automated decision-making tools (i.e. where a person is not involved in the decision). We typically use these tools when making straightforward decisions about you (for example, in certain claims handling processes). Where this is the case we provide you with more information so you understand what is involved.

As part of our business processes, decisions about you may be taken using automated computer software and systems. These decisions do not involve human input, and the software and

systems apply pre-defined logic programming and criteria to make a decision and assess how we deal with you in connection with the provision of services. For example, we sometimes use automated decision making as part of a process to decide whether a mobile phone insurance claim should be paid as requested (for example, if pre-specified criteria are met by responses that you provide, the claim will be paid automatically without the need for additional human intervention).

We provide you with more information in relation to any automated decision processes before or at the time that we intend to make decisions in this way. You have the right in certain circumstances not to be subject to a decision which is based solely on automated processing. Please see the section titled “Your rights” below.

Personal information that we collect from other sources We also collect and use personal information about you from third parties. We will receive your name, contact information (including postal address and telephone number), customer number and policy information (e.g., level of cover) from your telecommunications carrier (through whom you have procured this insurance product) to enable us to administer and perform your contract of insurance with us.

We also receive information about you (relating to your identity and previous claims made) from fraud prevention agencies and similar organisations to help us to make decisions on insurance policies and claims for you; trace debtors, recover debt, prevent fraud and to manage your insurance policy and any claims; check your identity to prevent money laundering; and undertake additional fraud searches, where necessary in pursuit of our legitimate interests in protecting our business from fraudulent activity and recovering sums due.

Who we share your personal information with Your personal information will be disclosed to the following parties on a need-to-know basis: other Assurant group companies, our service providers (such as Lifestyle Services Group Limited, an Assurant group company located in the United Kingdom), other insurance companies (e.g., reinsurers), your telecommunications carrier, and to any other entity or service provider (for example – consultants, third party administrators to handle claims and customer relations, couriers, repairers) contractually obligated to us for the purpose of performing tasks that directly relate to the above-described purposes.

In order to prevent or detect fraud or other criminal activity we share information about you with other organisations and public bodies including law enforcement agencies; within the Assurant group companies and with other insurers; with recognised centralised insurance industry claims review systems, where your details may be checked and updated; with fraud prevention agencies and databases - if you give us false or inaccurate information and we suspect fraud, we record this with fraud prevention agencies.

Your personal information will also be disclosed to public bodies and organisations to satisfy our legal and regulatory obligations, where required and allowed under the applicable data protection law.

Where we send your personal information With respect to the aforementioned purposes, your personal information may be transferred outside the European Economic Area to countries that have been deemed to have adequate protections for personal data (such as Israel and India). To ensure an adequate level of security and protection, these transfers will be secured by standard contractual clauses adopted by the European Commission, in line with applicable law. The Policyholder may request information about these international transfers, and/or request access to a copy of the standard contractual clauses using the contact details provided below.

How long we keep your personal information Your personal information will in principle be retained no longer than is necessary for the Policy to you. This means that your personal data will in principle be retained no longer than 6 years after termination or cancellation of your Policy to respond to questions, complaints or enquiries. However, we may retain your personal data longer if this is required to comply with a law or regulation to which we are subject or necessary for us to protect or exercise our rights, for as far as allowed under the applicable data protection law.

Information Security We have in place appropriate legal, organizational, physical and technical measures to protect personal information in conformity with applicable privacy and data security laws. As required by applicable law, when We retain a third-party service provider, that provider will be required to (i) use measures to protect the confidentiality and security of the personal information and (ii) process the personal information only as directed by us.

How and why we will contact you We may contact you by post, mobile phone, text, or email to provide the services to you, obtain your views on our services and to let you know about important changes to the services which we are providing or to ask you to complete a customer satisfaction survey. Any information that you provide to us in response to these communications will not be used or disclosed other than in accordance with this privacy notice, or without your permission, unless required by law. If you would prefer us not to contact you to obtain your views and feedback on the service or you change your mind in the future and would like us to stop contacting you for this purpose, you can request this at any time by calling us on 1850 92 77 11, by email: vodafone@osg.ie or write to: Vodafone Insurance, Merrion Hall, Strand Road, Dublin 4, Ireland.

Your rights Pursuant to the General Data Protection Regulation and/or applicable local law, you have a right of notice, access, data portability, rectification, restriction of processing, erasure of the information we hold about you, as well as an objection right and the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or re that decision produces a legal effect or otherwise significantly affects you which you may exercise at any time by sending your request in writing to: Vodafone Insurance, Merrion Hall, Strand Road, Dublin 4, Ireland. You may also submit your request in writing to Data Protection Officer, Assurant Europe Insurance N.V., Paasheuvelweg 1, 1105 BE Amsterdam, The Netherlands, or by sending an email to DataProtectionOfficer@assurant.com.

Please be referred to [this webpage](#) of the European Commission for further information on these rights

Please note that the exercise of such rights is not absolute and is subject to the limitations provided by applicable law. You may address a complaint or question concerning the processing of your personal information at the above-mentioned contact details. You may also lodge a complaint with your local data protection authority, which in Ireland is the *Data Protection Commissioner*, in the country where you live, work, or where you consider the problem has occurred.