

# Privacy Notice

## - Aon Ireland Limited (Commercial Risk) -

### 1. Introduction

This Privacy Notice (“**Notice**”) explains how Aon Ireland Limited and its affiliated companies and subsidiaries (“**Aon**”) makes use of the personal information collected about you in connection with our services. Throughout this Notice Aon may be referred to as "we", "us", "our" or “Aon”.

“**Services**” means insurance intermediary services, which includes but is not limited to insurance broking, claims management and risk consulting services.

### 2. Collecting Your Information

2.1 The information we collect about you may include the following:

- a) basic personal details, such as your name, address, contact details, date of birth, age, gender, marital status, occupation, Personal Public Service Number;
- b) demographic details, such as information about your lifestyle and insurance requirements, including details of your car, van, motorcycle or any other form of motor vehicles;
- c) driving history, certifications and insurance details, such as driving licence details, the period for which a licence has been held, existing and previous insurance policy details, previous accident and claims history, details of any motoring convictions and medical details;
- d) financial details such as payment card and bank account information and details of your credit history and bankruptcy status;
- e) claims details such as information about any claims concerning your insurance policy;
- f) information relating to notified/submitted claims/incidents where we provide claims services; and
- g) your marketing preferences.

2.2 You are required to provide any personal information that we reasonably require to meet our obligations in connection with the Services provided to you, including any legal and regulatory obligations. Where you refuse to provide information that we reasonably require to fulfil these obligations, we may not be able to offer the Services to you and/or we may terminate the Services provided to you with immediate effect.

2.3 Where you provide personal information to Aon about third party individuals (e.g. information about your spouse, civil partner, child(ren), named drivers or any other party named on a/your policy of insurance), dependants or emergency contacts, where appropriate, you should provide these individuals with a copy of this Privacy Notice beforehand or ensure they are otherwise made aware of how their information will be used by Aon.

2.4 In addition to collecting personal information from you directly, we may also collect personal information about you from other third parties, such as your employer, insurers, underwriters, reinsurers, credit reference agencies, medical professionals, government bodies, claimants, vetting and data validation agencies and other professional advisory service providers. . This information may be sourced prior to and during the course of providing the Services to you.

### 3. Processing Your Information

We will use the information we collect about you in connection with the Services to:

- a. assess your application to receive the Services;
- b. carry out due diligence, credit reference, bankruptcy, sanctions, premium credit, anti money laundering, data validation and other vetting and risk management agency checks;
- c. evaluate risks relating to your prospective or existing insurance policy;
- d. offer, administer and manage the services provided to you, including providing initial and renewal quotations and client care information;
- e. process your payment for the insurance premium and any mid-term adjustments;
- f. investigate and settle claims or complaints in relation to insurance policies and/or the Services provided;
- g. facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders;
- h. trace debtors and recover any outstanding debt in connection with the Services provided;
- i. fulfil legal and regulatory obligations and monitor compliance with the same;
- j. transfer books of business to successors of the business in the event of a sale or reorganisation;
- k. perform analytics for risk modelling purposes and to analyse trends;
- l. conduct market research and canvass your views about the services in order to develop and improve our products and service offerings generally; and
- m. offer other products and services that may be of interest to you.

### 4. Legal Grounds for Processing

Aon relies on the following legal grounds to collect and use your personal information:

**a. Performance of the services contract:**

Where we offer the Services or enter into a contract with you to provide the Services, we will collect and use your personal information where necessary to enable us to take steps to offer you the Services, to process your acceptance of the offer and to fulfil our obligations in our contract with you, especially for the processing activities set out in sections 3(a), 3(b), (c), (d) and (e) of this Notice.

**b. Legal and regulatory obligations:**

The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations, particularly for the processing activities set out in section 3 (i) of this Notice. For example, Aon is registered as an

insurance intermediary under the European Communities (Insurance Mediation) Regulations 2005 (as amended) and is regulated by the Central Bank of Ireland (“Central Bank”). Aon’s insurance intermediary reference number with the Central Bank is C1298. Aon is subject to the Codes of business conduct including the Consumer Protection Code, the Minimum Competency Code and Fitness & Probity Standards. These codes offer protection to consumers and can be found on the Central Bank’s website [www.centralbank.ie](http://www.centralbank.ie).

**c. Legitimate interests:**

The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests, e.g. to operate our business, particularly where we offer other products and services that may be of interest to you or conduct market research to improve our products and services generally including for the processing activities set out in sections 3(b), (f), (g), (h), (i), (j), (k), (l) and (m) of this Notice. Where we rely on this legal basis to collect and use your personal information we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred on you under applicable data privacy law.

**d. Consent:**

We rely on your consent to collect and use your sensitive personal information, especially for the processing activities set out in sections 3(c) and 3(f) of this Notice including information concerning motoring convictions, or health information where you provide this in connection with a claim against your insurance policy or in order to obtain a quote or insurance cover. We may also share this information with other insurance market participants and third parties where necessary to offer, administer and manage the services provided to you, such as insurers and insurance underwriters, reinsurers, brokers and vetting agencies.

Where we rely on your consent to collect and use your information, you are not obliged to provide your consent and you may choose to subsequently withdraw your consent at any stage once provided. However, where you refuse to provide information that we reasonably require to provide the services to you, we may not be able to offer you the services and/or we may terminate the services provided with immediate effect.

Where you choose to receive the services from us you agree to the collection and use of your sensitive personal information in the way that we describe in this section of the Privacy Notice. You also understand that such information may be collected and used for the above purpose by the insurance underwriter named in your insurance policy documentation. You should refer to the insurer’s privacy notice on their website for further information about their privacy practices.

## **5. Accuracy of Your Information**

We rely on the availability of accurate personal information in order to provide the Services to you and operate our business. You should, therefore, notify us of any changes to your personal information, particularly material changes concerning your contact details, bank account details, insurance policy details or any other information that may affect the proper



management and administration of your insurance policy and/or the Services provided to you.

## 6. Recipients of Your Information

We generally share your personal information with the following categories of recipients:

- a. **Within Aon:** We may share your personal information with other Aon entities, brands, divisions, and subsidiaries to serve you, including for the activities listed above.
- b. **insurance market participants** where necessary to offer, administer and manage the services provided to you, such as insurers and insurance underwriters, reinsurers, brokers, intermediaries and loss adjusters. The insurance underwriter is the insurer that is underwriting your insurance policy and is named in your policy documentation. You should refer to the insurer's privacy notice on their website for further information about their privacy practices;
- c. **Vetting and risk management agencies**, such as credit reference, criminal record, fraud prevention, data validation and other professional advisory agencies, where necessary to prevent and detect fraud in the insurance industry and take steps to assess the risk in relation to prospective or existing insurance policies and/or the Services. For example, we may check the Claims Insurance Link to assess and/or validate your previous claims history;
- d. **Legal advisers, loss adjusters, and claims investigators**, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature;
- e. **Medical professionals**, where you provide health information in connection with a claim against your insurance policy;
- f. **Law enforcement bodies**, where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders;
- g. **Public authorities**, regulators and government bodies, where necessary for Aon to comply with its legal and regulatory obligations;
- h. **Third party suppliers**, where we outsource our processing operations to suppliers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions;
- i. **Internal and external auditors** where necessary for the conduct of company audits or to investigate a complaint or security threat.
- j. **Successors of the business**, where Aon or the Services is sold to, acquired by or merged with another organisation, in whole or in part. Where personal information is shared in these circumstances it will continue to be used in accordance with this Notice.

## 7. Overseas Transfers of Your Information

7.1 We operate on a global and worldwide basis and we therefore reserve the right to transfer personal information about you to other countries to be processed for the purposes outlined in this Privacy Notice. In particular, we may make such transfers to offer, administer and manage the Services provided to you and improve the efficiency of our business operations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws, regulations and provide appropriate protection for the rights

and freedoms conferred to individuals under such laws.

7.2 Where we collect personal information about you in the European Economic Area (the “EEA”) or the UK we may transfer the information to countries outside the EEA or UK for the processing purposes outlined in this Privacy Notice. This may include transfers to countries that the European Commission (the “EC”) and the UK data protection regulator consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Aon has an intra-group data transfer agreement in place which regulates cross-border transfers of your personal information within the Aon Group and which incorporates the EU and UK standard contractual clauses approved by the EC and UK data protection regulators. Where we transfer personal information to third parties located in countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as the aforementioned data transfer agreements approved by the EC or the UK data protection regulator, as appropriate. Where necessary, we may implement additional technical, organizational or contractual measures to ensure an adequate level of protection for your personal information. Where required, further information concerning these safeguards can be obtained by contacting us.

## **8. Retention of Your Information**

We retain appropriate records of your personal information to operate our business and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the services to you. In most cases we shall retain your personal information for no longer than is required under the applicable laws. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

## **9. Information Security**

The security of your personal information is important to us and we have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy laws.

## **10. Your Information Rights**

10.1 You have the following rights under applicable data privacy law in respect of any personal information we collect and use about you:

- a. The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you;
- b. The right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy;
- c. The right to request the erasure of your personal information, particularly where the

continued use of the information is no longer necessary;

- d. The right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
- e. The right to object to the use of your personal information for direct marketing purposes. See section eleven (11) below for further information;
- f. The right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed and you request that the information not be used until its accuracy is confirmed;
- g. The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse;
- h. The right to object to decisions involving the use of your personal information, which have been taken solely by automated means. See section twelve (12) below for further information; and
- i. The right to withdraw consent at any time, whenever we have asked for your consent for processing your personal information without affecting the lawfulness of processing based on consent before its withdrawal.
- j. The right to complain to the relevant the Data Protection Commissioner concerning our processing of your personal information.

10.2 It is important to note, however, that some of the rights described above in section 10.1 can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy law we will write to you to explain the reason for refusal (e.g., for compliance with a legal obligation, for the establishment, exercise or defence of legal claims or legal exemptions). Where required, further information concerning these rights and their application can be obtained by contacting us..

10.3 If you hold insurance against a liability that may be incurred by you against a third party, where for whatever reason you cannot be found or you become insolvent, or the court finds it just and equitable to so order, then your rights under the contract will be transferred to and vest in the third party even though they are not a party to the contract of insurance. The third party has a right to recover from the insurer the amount of any loss suffered by them. Where the third party reasonably believes that the policyholder has incurred a liability the third party will be entitled to seek and obtain information from the insurer or your broker concerning:

- a. The existence of the insurance contract;
- b. Who the insurer is;
- c. The terms of the contract; and
- d. Whether the insurer has informed the insured person that the insurer intends to refuse liability under the contract.

## **11. Direct Marketing**

We will use your personal information to send you direct marketing about other products and services that we feel may be of interest to you. Your personal information will only be used for direct marketing in accordance with applicable laws and regulations. We will always give you the opportunity to refuse direct marketing when you receive direct marketing communications from us (usually in the form of an “unsubscribe link”). You can also change your marketing preferences at any stage by contacting us via Aon Global Preference Center. Please note that, even if you opt out of receiving direct marketing communications, we may still send you service-related communications where necessary.

## **12. Automated Decisions**

Where you apply or register to receive the Service we may carry out a real-time automated assessment to determine whether you are eligible to receive the Services. An automated assessment is an assessment carried out automatically using technological means (e.g. computer systems) without human involvement. This assessment will analyse your personal information and comprise a number of checks, such as credit history and bankruptcy check, validation of your driving licence and motoring convictions, validation of your previous claims history and other fraud prevention checks. Where your application to receive the Services does not appear to meet the eligible criteria, it may be automatically refused and you will receive notification of this during the application process. However, where a decision is taken solely by automated means involving the use of your personal information, you have the right to challenge the decision and ask us to reconsider the matter, with human intervention. If you wish to exercise this right you should contact your account handler or broker.

## **13. Complaints**

If you wish to make a complaint about the way we use your personal information you should raise this with us by contacting us in the first instance:

Data Protection Office, Metropolitan Building James Joyce Street Dublin 1  
or Email: [privacy@aon.ie](mailto:privacy@aon.ie)

However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the relevant data protection regulator.

Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland  
or online at <https://www.dataprotection.ie/en/contact/how-contact-us>.

## **14. Changes to this Notice**

This Privacy Notice is not contractual and Aon reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use personal information about you. Any updates or changes to this Privacy Notice will be



published on this website. You should periodically review this Privacy Notice to ensure you understand how we collect and use your personal information.

This privacy notice was updated in **October 2023**.

## **15. Contact Information**

If you have any questions about the content of this Notice or the rights conferred to you under applicable data privacy laws you should contact the Global Data Privacy Office at the following address:

Data Protection Officer, Metropolitan Building James Joyce Street Dublin 1

Ireland

Email: [privacy@aon.ie](mailto:privacy@aon.ie)