



Fastnet Underwriting Limited

Data Privacy Notice

Background

Fastnet Underwriting Limited (Fastnet) is committed to respecting and protecting your right to privacy and comply 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. Fastnet maintains the same privacy practices for data collected offline, and this statement also covers those methods of data collection and use.

Purpose

This data protection policy ensures Fastnet:

- complies with Data Protection legislation and follows good practice;
- protects the rights of employees, customers and partners;
- is transparent in terms of how it stores and processes individuals' data;
- protects itself from the risks associated with a data breach.

How we protect You and Your Data

Fastnet ('we', 'us', 'our', as referenced in this data protection statement) is the registered data controller regarding personal information held about you for GDPR purposes. The information you provide, along with any information provided by third parties in connection with your application, will be held by us in a computer database and/or in any other format.

We comply with GDPR. If you have any queries or complaints regarding how we use your personal data, please contact us using the details below;

Data Protection Officer

Compliance Department,

Fastnet Underwriting Ltd.,

NCI Business Centre.

Mayor Street Lower,

IFSC

D01 K7W8

E-mail: compliance@fastnetunderwriting.com

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 and Categories of Our Processing of Your Personal Data.

We collect and may continue to gather specific information about you or any individuals associated with your policy ('data subjects') throughout our relationship for the performance of your insurance contract, compliance with legal obligations, legitimate interests (ensuring the client meets our acceptable risk profile), and to aid in crime and fraud prevention. This information will be processed for the purposes of underwriting and managing your insurance policy, administering claims, complying with regulatory, legal, and tax requirements, and participating in internal or market-level statistical analyses.

For these purposes, information may be shared confidentially with third parties both within and outside the European Economic Area, including trustees, professional advisors, reputable external agencies, service providers, regulatory bodies and authorities, private investigators, other insurance and financial services companies (either directly or via a central register), and as required by law. We ensure that data transfers are lawful and that your information is securely kept and only used for the intended purposes.

We may verify the information you provide against publicly available information (such as court judgments). If false information is provided or information is withheld, and fraud is suspected, we will record this. Information about you may be shared with industry databases, such as those managed by Insurance Ireland, to exchange information among insurance companies to prevent non-disclosure and assist in fraud prevention, detection, and protection of our customers and our business.

We may also conduct searches with fraud prevention agencies and databases to:

- Assist in making decisions about providing and managing insurance, credit, and related services for you

- Trace debtors or beneficiaries, recover debts, prevent fraud, and manage your accounts or insurance policies
- Verify your identity to prevent money laundering, unless satisfactory proof of identity is provided
- Perform credit checks and additional fraud prevention checks

Additionally, we record telephone conversations for verification and training purposes.

Consent

There may be instances where it is necessary for us to gather sensitive data (such as medical conditions or criminal convictions) concerning you and other individuals listed on the insurance policy. Your consent for this processing may be required, and it is your responsibility to obtain consent from others named on your policy before sharing their sensitive information with us. You have the right to withdraw your consent to this processing at any time. However, please note that withdrawing consent may affect our ability to provide insurance coverage or process claims.

Insurance Link

Information regarding claims, whether initiated by our customers or third parties under policies we administer, is gathered upon claim submission and recorded in a claims database specific to the insurance industry, known as Insurance Link. For the policies we manage, it is the underwriter, AIG, who submits relevant claims data to Insurance Link. This data may be disclosed to other insurers, self-insurers, or regulatory bodies.

Insurance companies use claims data for the following purposes:

- Preventing multiple claims for the same personal injury or property damage.
- Verifying the accuracy of claims information against details provided during insurance policy inception.
- Serving as a basis for investigating claims when discrepancies are detected in our records or when there are suspicions of attempted insurance fraud.

The primary objective of Insurance Link is to aid in the detection of inaccurate information and fraudulent claims, thereby safeguarding the interests of both you and all our customers. Guidelines governing the sharing of your information with other insurers, self-insuring entities, or regulatory bodies can be found in the Data Protection Commissioner's Code of Practice on Data Protection for the insurance sector, accessible at www.dataprotection.ie.

Your Rights

You have the right to access or obtain copies of the personal information we hold about you. We will respond to your request within one month of receiving a valid request. If you seek information held by the insurer, you must contact them directly.

You also have the right to restrict the processing of inaccurate information and request corrections to any inaccuracies in your personal data. In certain circumstances, you may have the right to request the erasure of your data.

If we hold or process your data based on your consent, you have the right to withdraw that consent at any time.

To exercise these rights, please contact us using the details provided above.

Data Protection Complaint

If you are not satisfied with our use of your data or our response to any request by you to exercise any of your rights you have the right to lodge a complaint with the Office of The Data Protection Commissioner. Please see the below contact details:

Data Protection Commissioner
Canal House
Station Road
Portarlinton
County Laois
R32 AP23

Phone: +353 (0)761 104 800.
E-Mail: info@dataprotection.ie
Website: www.dataprotection.ie

For UK data breaches, the ICO can be contacted using the following table:

England	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate) Email: casework@ico.org.uk
Scotland	Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HK Phone: 0131 244 9001 Email: scotland@ico.org.uk
Wales	Information Commissioner's Office 2 nd Floor Churchill House Churchill way Cardiff

	CF10 2HH Phone: 029 2067 8400 Email: wales@ico.org.uk
Northern Ireland	Information Commissioner's Office 3 rd Floor 14 Cromac Place Belfast BT7 2JB Phone: 0303 123 1114 (local rate) or 028 9027 8757 (national rate) Email: ni@ico.org.uk

Types of Information Collected

Personal Data

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

Non-Personal Data

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

Purposes for Which We Hold Your Information

Non-Personal Data

We utilise the Non-Personal Data collected from website visitors in an aggregate form to gain insights into the origins of our visitors and to assist us in enhancing the design and organisation of our website.

Personal Data

Any Personal Data you provide to us will be processed for the following purposes:

- To deliver the services you have requested.

- To contact you if necessary regarding your request or to respond to any communications you send to us.
- To inform you about any special offers that may periodically become available.

Disclosure of Information to Third Parties

We do not share your Personal Data with third parties unless you have given consent for such disclosure, or unless the third party is necessary to fulfil your order (in which case, they are obligated to maintain similar data protection standards). We may disclose your Personal Data if we believe in good faith that such disclosure is necessary to comply with applicable law, a court order, a search warrant, a regulatory requirement, or other legal obligation.

Retention of Data

We retain your personal data only for as long as necessary and for the purpose(s) for which it was originally collected. This includes retaining data as long as there is a potential for you or us to bring a legal claim under the insurance, or where retention is mandated by legal or regulatory obligations.

Sale of Business

In the event of a sale, merger, liquidation, receivership, or transfer of all or substantially all of our company assets, we reserve the right to transfer information (including your Personal Data) to a third party. Any such transfer will be subject to the third party agreeing to adhere to the terms of our Website Privacy Policy and using your Personal Data solely for the purposes for which you provided it to us. You will be notified of any such transfer and provided an opportunity to opt-out if desired.

Security

Your Personal Data is stored on secure servers. While we take reasonable steps, including appropriate technical and organisational measures, to protect your Personal Data, please note that no transmission over the Internet can be guaranteed to be completely secure. The nature of the Internet means that we cannot warrant the security of any information transmitted to us electronically.

Call Recording

Telephone calls to us and received from us will be recorded for training and quality purposes. Call recordings may also be supplied to the Insurer, intermediary or appropriate 3rd parties if required it to investigate a claim or complaint and for the detection and prevention of criminal activity or fraud.

Privacy & Cookies

A cookie is a small information file sent to your computer and stored on your hard drive. Websites often use cookies to remember your preferences and save you time when you revisit. Our site statistics software currently utilizes cookies to measure site activity.

Additionally, we may use remarketing to advertise to users who visit our website. Cookies are employed to track your past interactions with our site and display ads tailored to your interests on third-party websites you visit subsequently. For more details and to learn how to opt out, please refer to our comprehensive Cookie Policy.