

# Brokers' Privacy Policy

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## 1. Identification and contact details of the Data Controller

Liberty Seguros, Compañía de Seguros y Reaseguros, S.A., (trading in Ireland as Liberty Insurance) with registered office at Dublin Road, Cavan, County Cavan, Ireland, H12 VW93, with VAT number IE9952754S, and telephone 1890 89 1890 (hereinafter "Liberty Insurance" or the "Insurer") is the controller of the processing of personal data that is processed through Liberty Insurance brokers' portal [www.libertyconnect.ie/es](http://www.libertyconnect.ie/es) and communication and contracting channels made available to brokers by Liberty Insurance. This clause provides information on how the Insurer will use your personal data.

In addition, the purpose of this Privacy Policy is to provide information to brokers, as well as anyone acting on their behalf, on the processing of personal data and the rights under the General Data Protection Regulation ("GDPR"), including processing when they file a claim, exercise a right, receive training or participate in competitions and prize draws organised by Liberty Insurance.

Liberty Insurance has a Data Protection Officer appointed before the Data Protection Commission, who can be contacted at the following address [DataProtectionOfficer@libertyinsurance.ie](mailto:DataProtectionOfficer@libertyinsurance.ie). If you have any questions regarding the processing of your personal data, please contact the Data Protection Officer at the aforementioned address.

## **2. General information: description of the information contained in the Privacy Policy**

In this Privacy Policy you will find tables identifying each of the different services offered by Liberty Insurance.

These informative tables will detail:

- The purposes of the processing of your personal data, i.e. the reason why Liberty Insurance processes your personal data.
- The legal basis that allow the processing of data by the Insurer for each of the purposes indicated.
- The possible communication of your data to third parties, as well as the reason for such communication. For these purposes, we do not transfer your personal data to third parties except when there is a legal obligation to do so (Tax Authorities, Judges and Courts, Security Forces and Bodies...), or when we expressly indicate it in the table that appears below. On the other hand, Liberty Insurance data processors may have access to your personal data, i.e. service providers that have access to your personal data for the performance of their services. Service providers who access your personal data are generally providing services relating to information systems, technology, telecommunications, cloud computing and network security, profiling for statistical-actuarial purposes, private investigation, anti-fraud, finance and billing, professional services where necessary (including experts, lawyers, garages or doctors), or customer services. The table below will indicate those other areas where Liberty Insurance service providers may have access to your data from time to time. You can request more detailed information about the recipients of your data by sending an e-mail to the address [DataProtectionOfficer@libertyinsurance.ie](mailto:DataProtectionOfficer@libertyinsurance.ie), indicating the specific processing activity about whose recipients you would like information.
- The existence of potential international data transfers. For these purposes, many of our processing activities require the transfer of data internationally to technological service providers or entities of the group to which Liberty Insurance belongs, located in the United States, United Kingdom and India, for which the pertinent Standard Contractual Clauses apply. You can request more detailed information regarding the international transfers of your data or the guarantees applied by sending an e-mail to

[DataProtectionOfficer@libertyinsurance.ie](mailto:DataProtectionOfficer@libertyinsurance.ie), indicating the specific processing activity about which you would like to receive information about the guarantees applying.

- The retention period of the data you provide us with. For this purpose, we keep your personal data for the duration of the contractual relationship, or for a longer period if you have given us your consent. Subsequently, your data will remain blocked to deal with judicial, administrative or tax claims, during the statute of limitations period determined by the applicable regulations.

### 3. Necessary, up-to-date and accurate information

You are required to provide us with the data we request through various means of collection, including the digital portals of Liberty Insurance, email, telephone or paper. If you do not provide us with all information requested, we may not be able to send you communications or provide you with the insurance related services you have requested. Likewise, by fulfilling and sending the required information, you declare that the information and data you have provided is accurate and true.

So that the information provided is always up to date and contains no errors, you must inform Liberty Insurance, as soon as possible, about the changes to and rectifications of your personal data, using the form you will find at the following [link](#).

### 4. Exercising your rights

You can exercise the following rights:

1. right of **access** to your personal data to find out if it is being processed, and if so, what exactly is being processed and the specific processing activity that is being carried out, including the purposes, categories of data processed and recipients, among other information;
2. right of **rectification of** any inaccurate personal data;
3. right of **erasure** of your personal data when, among other reasons, it is no longer necessary for the purposes for which it was collected, and provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is not a legal obligation;

4. right to **object** to the processing of your personal data, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is the legitimate interest of Liberty Insurance or a third party. Liberty Insurance will stop processing your data unless a compelling or higher legitimate interest for the processing is proven, or in case we may retain the data in blocked form for the exercise or defence of claims;
5. the right to request the **restriction** of the processing of your personal data where the accuracy, lawfulness or necessity of the data processing is in question, in which case we may retain the blocked data for the exercise or defence of claims;
6. the right to **portability** of your data, i.e. to receive your personal data in a structured, commonly used and machine-readable format, in order to transmit it to you or to another data controller, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table in [section 5](#), is the existence of a contractual relationship or your consent;
7. the right not to be subject to **automated** decisions that may effect on your legal rights, or that significantly affect you and when such decisions are being made;
8. right to revoke your **consent** given to Liberty for the processing of your data, provided that the legitimate basis that enables us to process your data, from among those indicated in the second column of the table included in [in section 5](#), is your consent.

You can exercise your rights at any time and free of charge through the form you will find at the following [link](#).

In addition, you have the right to lodge a complaint with Liberty Insurance or the Data Protection Commission if you believe that there has been a breach of data protection legislation in relation to the processing of your personal data.

## 5. Detailed information of the processing carried out by service.

### 5.1 If you are a broker and collaborate with Liberty Insurance, we may process your data for the following purposes:

<b>Purpose of the processing</b>	<b>Legitimate basis</b>	<b>Recipients</b>	<b>Retention period</b>
<p>To engage brokers and manage the accounting, invoices, collections, payments and commissions due to the broker for their mediation work, as well as the management of investments through agreements with the broker.</p>	<p>Performance of a contract.</p>	<p>Your data may be transferred on the basis of this processing to public authorities, courts, banks, lawyers, external auditors, and other insurers when there is a direct relationship with the broker.</p> <p>The categories of service providers that could access your data, in addition to those indicated in <a href="#">section 2</a>, would be digital signature service providers and document storage and destruction service providers.</p>	<p>For the duration of the contractual relationship.</p>
<p>To manage the relationship with customers introduced by brokers at the request of the broker through the various communication channels established by Liberty Insurance for this purpose: To support them, coordinate them, answer their queries, send any necessary communication, obtain sales ratios, support their product portfolio and renewals, claims, update customer and broker data, classify documentation sent and received, and deal with customer queries, among others.</p>	<p>Performance of a contract</p>	<p>Your personal data will not be transferred on the basis of this processing.</p> <p>The categories of service providers that could access your data, in addition to those indicated <a href="#">in section 2</a>, would be providers for the sending of communications, messaging, bureaucratic, storage and destruction of documentation, digital signature, customer service and claims management.</p>	<p>For the duration of the contractual relationship.</p>
<p>To interact with brokers and respond to their requests through Liberty Insurance's digital channels, including the Broker</p>	<p>Legitimate interest of Liberty Insurance in</p>	<p>Your personal data will not be transferred on the basis of this processing.</p>	<p>For the duration of the</p>

<p>Portal, webChat, or even through instant messaging applications at the request of the broker.</p>	<p>interacting with its broker partners in a more agile, simple and efficient way.</p>	<p>The categories of service providers that may have access to your data are limited to those indicated in <a href="#">2 section</a>.</p>	<p>contractual relationship.</p>
<p>To manage tax returns and refunds, as well as possible seizure requests and attempts to recover from private entities.</p>	<p>Compliance with legal obligations.</p>	<p>Your personal data will be transferred to public authorities who, within the scope of their functions and powers, so request this.</p> <p>The categories of service providers that could access your data, in addition to those indicated in <a href="#">section 2</a>, would be providers of administrative and billing services.</p>	<p>For the duration of the contractual relationship.</p>
<p>To prevent and manage broker non-payments and initiate legal proceedings in the event of late payments.</p>	<p>Performance of a contract.</p>	<p>Your data may be communicated to courts, tribunals and lawyers as part of this processing.</p> <p>The categories of service providers who may have access to your data, in addition to those indicated in <a href="#">section 2</a>, would be providers of consultancy and legal services.</p>	<p>For the statute of limitations period.</p>
<p>Sending marketing campaigns, promoting Liberty Insurance products and brand and sending information about offers and incentives through commercial profiling.</p>	<p>Liberty Insurance's legitimate interest regarding the sending of commercial communications that may be of</p>	<p>Your personal data will be transferred on the basis of this processing to entities of the Liberty Insurance group and to external auditing companies.</p> <p>The categories of service providers that may have access to your data, in addition to what is indicated in <a href="#">section 2</a>, would be marketing and communication companies.</p>	<p>For the duration of the contractual relationship, or until the broker objects.</p>

	interest to the brokers.		
Quality of service surveys via email or SMS	Liberty Insurance's legitimate interest to make strategic and business decisions in order to improve services to brokers through their responses in the surveys conducted.	<p>Your personal data may be communicated to the parent company of the group to which Liberty Insurance belongs based on this processing.</p> <p>The categories of service providers that may have access to your data, in addition to what is indicated in <a href="#">section 2</a>, would be companies that carry out surveys and companies of the group to which Liberty Insurance belongs.</p>	For the duration of the contractual relationship, or until the broker objects.
Changes of broker position and management of broker codes: to manage changes of mediator position in the portfolio managed by the mediator either at the customer's request, termination of the activity or portfolio transfer, as well as the registration, renewal, cancellation or suspension of the mediator code.	Performance of a contract	<p>Your personal data will not be transferred on the basis of this processing.</p> <p>The categories of service providers that may have access to your data are limited to those indicated in <a href="#">section 2</a>.</p>	As long as some rights are held on the portfolio.
To assess requests for coverage from customers, to manage the underwriting and renewal of any Liberty Insurance policy, including income of investment products, through the various channels	Performance of a contract.	Your data may be communicated by virtue of this processing to Mapfre, Gamma, Verisk Insurance, Autoglass, Segurnet, the Irish League of Credit Unions, doctors, garages, roadside assistance services and audit service providers.	For the duration of the contractual relationship.

<p>available for this purpose at Liberty Insurance, as well as the maintenance of the contractual relationship, document management, risk inspections, correction and defence of the portfolio, the collection of services or payment of compensation for claims, claims management and any other service that customers may request, including changes, supplements, cancellations, quotations, green cards or requests for information, among others.</p>		<p>The categories of service providers that may have access to your data, in addition to those indicated in <a href="#">section 2</a>, are providers of statistical-actuarial services, electronic communications, customer service, billing and professional services, official services, messaging services, call recording services, expert appraisal services and vehicle valuation services (Eurotax).</p>	
<p>To develop insurance products, analyse, monitor and plan results and productivity for strategic decision making, including through actuarial and accounting records. To analyse claims data in order to report relevant information. As well as, to ensure that the procedures and initiatives of Liberty Insurance are aligned with the applicable internal and local regulations.</p>	<p>Liberty Insurance's legitimate interest in improving its insurance products, documenting and carrying out the most beneficial decision making for Liberty Insurance customers and the Insurer's profitability, as well as to ensure that all procedures comply with the</p>	<p>Your personal data will be transferred on the basis of this processing to the parent company of the group to which Liberty Insurance belongs and to reinsurance companies.</p> <p>The categories of service providers that may have access to your personal data, in addition to what is indicated in <a href="#">section 2</a>, would be providers of statistical-actuarial analysis services, customer service, breakdown assistance and medical experts.</p>	<p>For the duration of the contractual relationship.</p>



	quality standards set by the Insurer and the applicable regulations		
To investigate, detect and prevent fraud, as well as identity and marital status fraud.	Liberty Insurance's legitimate interest in preventing and detecting insurance fraud, and in avoiding impersonation of its customers, as well as in defending itself against extra-judicial or judicial claims.	<p>Your personal data will be transferred on the basis of this processing to public authorities, other insurance companies, lawyers and insurance industry associations.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in <a href="#">section 2</a>, would be customer service and claims investigation service providers.</p>	For the duration of the contractual relationship.
To develop, test and manage applications, technology projects, software, and manage the transfer of information across Liberty Insurance's technology network. Hosting data and documentation in the cloud, detecting possible technological failures in the systems, as well as those failures or updates identified in the context of a quotation, policy or a claim and solving them with the help of technology.	Depending on the specific case: (i) Liberty Insurance's legitimate interest; (ii) Management of the contractual or pre-contractual relationship; (iii)	<p>On the basis of this processing, your personal data will be transferred to public authorities, driver databases and entities of the group to which Liberty Insurance belongs, within the framework of a global management of customer data.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in <a href="#">section 2</a>, are professional service providers, communications providers,</p>	For the duration of the contractual relationship.

<p>To make back-up copies of the systems, maintain the business continuity plan, the security breach management policy, the information access control policy, as well as to control the traffic of information entering/leaving the Insurer's systems.</p>	<p>Fulfilment of a legal obligation.</p>	<p>couriers, information storage and destruction providers, and customer service providers.</p>	
<p>To handle claims for any of Liberty Insurance's product lines, including motor, home, commercial, industrial, life and pension plans, among others, whether they involve personal injury or not. To carry out the corresponding damage assessment, as well as the management of the network of service providers in the context of claims and the communication of data to these providers for this purpose, and the corresponding compensation payments and medical assistance, if applicable.</p>	<p>Performance of a contract</p>	<p>Your personal data will be disclosed on the basis of this processing to the police, courts and tribunals, public authorities, lawyers, solicitors, the third-party insurer, salvage service companies, breakdown assistance services, garages, experts, medical consultants, claims investigators, locators and other companies of the group to which Liberty Insurance belongs within the framework of a global management of customer data.</p> <p>The categories of service providers that may have access to your data, in addition to those indicated in <a href="#">section 2</a>, are customer services, claims processing, repairs, medical expertise, courier services, storage and destruction of information, and private investigation services.</p>	<p>For the duration of the contractual relationship.</p>
<p>To manage notices, injunctions, lawsuits, seizure responses, judicial and prejudicial proceedings initiated by (or against) Liberty Insurance, as well as coordinate the network of external lawyers in legal proceedings.</p>	<p>Legal obligation</p>	<p>Your personal data will be disclosed on the basis of this processing to courts and tribunals, lawyers, solicitors, auditors and the parent company of the group to which Liberty Insurance belongs.</p>	<p>Until the end of the proceedings.</p>

		The categories of service providers that may have access to your data, in addition to those listed in <a href="#">section 2</a> , would be providers of call recording services.	
<p>Call recording for the purpose of quality control, monitoring the service provided and compliance with internal procedures and applicable regulations, improving the performance of agents, training agents, improving customer experience, and as a means of proof of the existence and veracity of commercial transactions and queries made.</p> <p>This is based on a telecommunications infrastructure and of electronic and telephone communications that guarantees business continuity.</p>	<p>Liberty Insurance's legitimate interest to improve the quality of service, ensure implementation of its policies and improve the customer experience.</p>	<p>Your data will not be passed on to third parties as part of this processing.</p> <p>The categories of service providers that may have access to your information, in addition to those listed in <a href="#">section 2</a>, would be customer service providers and call recording services.</p>	<p>For the duration of the contractual relationship.</p>
<p>To offer training to brokers through different channels, including the platform set up for this purpose for Liberty Insurance's Western European Market.</p>	<p>Depending on the training in question: (i) Fulfilment of a legal obligation; (ii) Management of the contractual relationship; (iii) Liberty Insurance's</p>	<p>Your data will not be passed on to third parties as part of this processing.</p> <p>The categories of service providers who may have access to your data, in addition to those listed in <a href="#">section 2</a>, would be training service providers.</p>	<p>For the duration of the contractual relationship.</p>

	legitimate interest.		
Management of the information provided and complaints made through the Insurer's ethics line.	Legal obligation.	<p>Your data will not be transferred to third parties as part of this processing. However, the parent company of the group to which Liberty Insurance belongs is jointly controller for this processing.</p> <p>The categories of service providers that may have access to your data are limited to those indicated in <a href="#">section 2</a>.</p>	Until the investigation or proceeding is completed.
Attending to requests from official bodies	Legal obligation.	<p>Your personal data will be transferred on the basis of this processing to any official body or public authority requesting it in the context of an investigation.</p> <p>The categories of service providers that may have access to your data are those indicated in <a href="#">section 2</a>.</p>	Until the request is complied with.
Prevention of conflicts of interest in relation to the portfolio of exclusive agents in order to ensure that they do not maintain active collaborations with other insurance companies.	Legal obligation.	<p>Your data will not be passed on to third parties as part of this processing.</p> <p>The categories of service providers that may have access to your data are those indicated in <a href="#">section 2</a>.</p>	For the duration of the contractual relationship.
Video surveillance and control of visits to the different Liberty Insurance offices to ensure the safety of people and property and the Insurer's premises, as well as for	Liberty Insurance's legitimate interest in ensuring the	The categories of service providers that could access your data, in addition to those indicated in <a href="#">section 2</a> , would be providers of access control, security and video surveillance services.	1 month or until investigation or legal proceedings

the prosecution of crimes, where appropriate.	security of its facilities.		have been terminated.
To provide legal and tax advice to other departments, review and improve processes involving data processing, identify and report financial and legal risks, and ensure the company's regulatory compliance.	Legitimate interest of Liberty Insurance in defending its legal and commercial interests.	<p>Your data may be communicated within the framework of this processing to courts, tribunals and lawyers, as well as to the parent company of the group to which Liberty Insurance belongs.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in <a href="#">section 2</a>, would be customer service, consulting and legal providers.</p>	For the duration of the contractual relationship.
To carry out internal and/or external audit processes.	Legal obligation.	<p>Your data may be communicated within the framework of this processing to external auditors or to the parent company of the group to which Liberty Insurance belongs.</p> <p>The categories of service providers that may have access to your information, in addition to those listed in <a href="#">section 2</a>, would be fraud analysis service providers.</p>	For the duration of the contractual relationship.
To prevent money laundering and the financing of terrorism	Depending on the specific case: (i) compliance with a legal obligation to which Liberty Insurance is subject; (ii) Legitimate interest of Liberty Insurance in	<p>Your data may be communicated within the framework of this processing to the parent company of the group to which Liberty Insurance belongs.</p> <p>The categories of service providers that may have access to your information are those listed in section 2.</p>	For the duration of the contractual relationship.

	preventing money laundering and the financing of terrorism.		
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**5.2 If you have also lodged a complaint or exercised a right before Liberty Insurance, we may process your data for the following purposes:**

<b>Purpose of the processing</b>	<b>Legitimate basis</b>	<b>Recipients</b>	<b>Retention period</b>
Complaints and queries about the service: to deal with complaints submitted through the electronic channels made available for this purpose, by telephone, by post or by e-mail. In the event you contact us by phone, your call may be recorded.	Legal obligation to deal with brokers' complaints raised; and Legitimate interest in attending to complaints and queries.	Your personal data may be transferred on the basis of this processing to the official body, ombudsman or public authority involved in the complaint submitted.  Access shall be provided to service providers in addition to those indicated in <a href="#">section 2</a> , which are providers of customer service and call recording services.	Until the resolution of the complaint or query raised.

<p>Complaints and queries about the service: to respond to complaints regarding privacy and exercise of rights of access, rectification, erasure, objection, restriction and portability through the corresponding electronic form provided for this purpose, by telephone, by post or email. In the event you contact us by phone, your call may be recorded.</p>	<p>Legal obligation to respond to complaints regarding privacy or exercise of rights of access, rectification, erasure, objection, restriction and portability raised by brokers, customers or any other interested party who has been in contact with the broker.</p>	<p>Your personal data will be passed on to the Data Protection Commission on the basis of this processing if the complaint is received by the Data Protection Commission.</p> <p>Access shall be provided to service providers in addition to those indicated in <a href="#">section 2</a>, which are providers of customer service and call recording.</p>	<p>Until the resolution of the complaint raised.</p>
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**5.3 If you are also a participant in a competition or prize draw organised by Liberty Insurance, the Insurer may process your data for the following purposes:**

<b>Purpose of the processing</b>	<b>Legitimate basis</b>	<b>Recipients</b>	<b>Retention period</b>
Participation in competitions and promotions organised by Liberty Insurance	Broker's consent.	Your personal data will not be transferred on the basis of this processing.  The categories of service providers that may have access to your data, in addition to those indicated <a href="#">in section 2</a> , would be communication and messaging providers.	1 year.
Participation in prize draws organised by Liberty Insurance, including those conducted through Liberty Connect Webchat.	Broker's consent.	Your personal data will not be transferred on the basis of this processing.  The categories of service providers that may have access to your data, in addition to those indicated <a href="#">in section 2</a> , would be communication and messaging providers.	1 year

## 6. Confidentiality

The personal data that we may collect through our websites, portals, forms, contact mailboxes, as well as through the various electronic or telephone communications that we maintain with you or your representative will be processed confidentially by Liberty Insurance, with Liberty Insurance pledging to keep these confidential in accordance with the provisions of applicable law.

## 7. Update of the Privacy Policy

This Privacy Policy may need to be updated. It is therefore necessary that you review this policy periodically and, if possible, every time you contact us, or access the Liberty Insurance Broker Portal [www.libertyconnect.ie](http://www.libertyconnect.ie), in order to be properly informed about the type of information



collected and its processing. You can find the Broker Privacy Policy on the Liberty Insurance Broker Portal. Notwithstanding the foregoing, we will notify you of any changes to this Privacy Policy that may affect the processing of your personal data by means of a notice on the respective Broker Portal. This Privacy Policy is effective as of 15th June 2021.