

HEALTH
INSURANCE



Irish Life
health

Consumer Information

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1 PRIVACY NOTICE

1 WHAT IS A PRIVACY NOTICE & WHY IS IT IMPORTANT?

We know your personal information is important to you and it is important to Irish Life Health too. This Privacy Notice tells you what we use your personal information for and explains your rights around how we use it. Please read this Privacy Notice to understand how and why we use your personal information.

If you give us personal information about someone else, please make sure you have their permission and please make them aware of this Privacy Notice, as it also applies to them.

2 WHAT INFORMATION WE COLLECT AND WHY

We use your personal information and the personal information of other members on your plan to provide you with health insurance plans, customer service and to assess and pay claims. This personal information includes but is not limited to, your name, date of birth and contact details.

If we collect any sensitive personal information, we will restrict access to, and use of this. Please note that if you give us false information or fail to disclose information, we will record this.

We must have a lawful basis to collect and use personal information, the below sets these out:

Needed for your contract:

Personal information about you and other members on your plan (as referenced above) is held and used to:



- > process your application
- > issue your plan
- > provide you with information about your plan
- > make and receive payments to you and from you
- > provide customer care and service
- > contact you to inform you of any relevant actions you may need to take
- > administer your plan and pay claims. We have an automated system in place for Online Day to Day claiming which allows you to submit your claims online and get paid directly into your bank account. You can however, request that a person make the decision on your claim.

We also collect and use personal information about insurance brokers to service their agency contracts with us.

Required by law:

We use your personal information to comply with law and regulations for example:



- > reporting to regulators
- > keeping proper books and records
- > actuarial claims analysis and risk management to ensure the company stays financially sound
- > we may in certain circumstances share your personal information with other health insurers for the purposes of verifying your lifetime community rating loading information and determining waiting periods to the extent permitted by law.
- > we are also required to screen all customers against Financial Sanctions lists and to do this we will use your name, date of birth and address.
- > if we provide you with advice we are required to complete an analysis of your health insurance needs to ensure that we recommend a health insurance plan that is the most suitable for you



We carry out internal reporting, quality checking, compliance controls and audits to help meet our legal obligations.

If you visit our offices we will record CCTV footage for safety and security reasons. We only hold these recordings temporarily and for longer if we need to for safety and security investigations.

Irish Life Health's legitimate interest:

We use your personal information for our legitimate interests as shown below. We have taken account of any privacy risks and ensured that your data protection rights are not affected. We believe these uses benefit our customers. You can contact us if you have any questions using the details in section 8 of this Privacy Notice.

> Call Recording:

- for customer service training and compliance purposes, we record and monitor calls. We let you know if a call is being recorded at the start of the call so you can decide whether to continue with the call or not.

> Sharing with your Insurance Broker:

- if you choose to take your health insurance out through an insurance broker, we will share your personal information with your insurance broker and keep them up to date on your plan. This allows them to give you better advice.

> **Statistical Analysis:**

- we combine and group personal information for analysis to help us understand our customers and develop better products, services, and promotions
- we also share this information with Irish Life Group for the same purposes.
- we use summary information to help promote our products and services.

> **Research:**

- to help improve the level of service we provide, we may on occasions contact you for participation in consumer satisfaction or research surveys. Your details may be used for these purposes for 12 months after your policy has ended.

> **Clinical Audit**

- we may, on occasion look for information from your GP, consultant, hospital or other medical provider regarding any treatment provided to you or other members of the insurance policy. A clinical audit is undertaken to understand the appropriate use of resources and the resulting outcome and quality of life for patients.

With your consent:

You need to give consent for us to collect and use personal information for certain uses. You are given the choice to provide consent, or not. When we collect your consent, we will explain what we need it for and how you can change your mind in the future.



> **Direct Marketing:**

- we would like to be able to contact you about offers and services from Irish Life Health and our group of companies, separately from your plan communications. We will only send you direct marketing content where we have your consent.
- where you have already indicated a preference, this will remain unless you subsequently contact us to change this.

> **Cookies:**

- when you visit our website we will use cookies, for example, we use cookies to show you Irish Life Health advertisements where you have visited our website before or visited other websites offering similar products and services. We will ask for your consent to use these once you visit the website.

> **Sharing with Other Companies within the Group:**

- we believe that it may be helpful to you for us to know whether you have products and services provided by other companies within the Group e.g. Irish Life. We will use this to provide you with additional services with your consent.

3 CONSENT AND HOW TO WITHDRAW CONSENT?

If we process your personal information based on consent, you have the right to withdraw that consent at any time. The opt-out methods will depend on how the consent was collected and will be explained when you give us your consent, e.g. you can change your mind using the opt-out link in any direct marketing emails sent to you.

You will also be able to withdraw consent by contacting us directly using the details in section 8 of this Privacy Notice.

4 HOW AND WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?

You provide us with your personal information (and the personal information of other members on your policy) directly when you contact us, complete our forms, speak with us or visit our website, social media accounts and mobile apps. For more information on what personal information is collected and used on our website please see our Cookies Policy at <http://www.irishlifehealth.ie/privacy-and-legal/privacy-statement/>



We also get personal information from insurance brokers, solicitors, employers, regulators, GPs, consultants, hospitals or other medical providers as and when required.

5 WHO DO WE PASS YOUR PERSONAL INFORMATION TO?

> Data processors:

- companies that act as service providers under contract with us and only process your personal information as instructed by us. Your personal information is transferred securely and is not used by other parties for any other reason. The categories of services that we use other Data Processors for include: document management, administration, customer services, marketing, and financial sanctions list screening.



> Insurance Brokers:

- who act as your intermediary to give service and advice on your plan.

> GPs/Consultants or Hospitals:

- in certain instances, we may need to collect personal information, including medical or other sensitive personal information, from third parties about you and any other member named on your policy. This information will remain strictly confidential and will only be sought and used in order to provide the services set out in your contract with us and for administration of your plan.

> **Reinsurers:**

- that we have a contract with. You can see our current panel of reinsurers on our website at <https://www.irishlifehealth.ie>.

> **Regulators:**

- regulators and the Revenue Commissioners or as needed to comply with regulations and laws.

> **Other Companies:**

- we pass your personal information to third parties, including other companies within the Irish Life Group for the provision of administrative services

> **Your Employer**

- where your plan has been set up through your employer, we will share information with them to the extent that is required in order to administer the group scheme

6 DO WE TRANSFER IT OUTSIDE OF THE EU?

Your personal information is processed and stored within the EU. However we do pass personal information securely to our parent company Great West LifeCo in Canada. This is used for screening our customers against financial sanctions lists to comply with relevant legislation.



Passing your personal information to certain countries, including Canada, is allowed under an adequacy decision made by the European Commission. This means you have the same standards of protection as you have within the EU. As our parent company, Great-West Lifeco has a legal obligation to maintain a record of this screening.

7 HOW LONG DO WE KEEP IT FOR?

We keep and use your personal information for as long as you have a health insurance contract with us. We also hold it after this where we are required to by law for example where we need to for complaints handling and for system back-ups needed for disaster recovery.

We will let you know how long we keep personal information for when you avail of a specific service such as a quote or call-back on our website.

8 WHAT ARE YOUR RIGHTS?

You have a number of rights over your personal information which you can exercise free of charge by contacting us using the details in section 8 of this Privacy Notice. You will need to give us information to help us identify you and we will respond to you within one month. Any restrictions to your rights will be explained in our response.



> Right to Information

You have a right to the information set out in this Privacy Notice. The most recent version of our Privacy Notice will always be accessible on our website at <http://www.irishlifehealth.ie/privacy-and-legal/privacy-statement/>

If we make changes to the type of personal information we collect and / or how we use it, we will inform you of the changes. We have controls in place to protect your personal information and minimise the risk of security breaches, however, should any breaches result in a high risk for you, we will inform you without delay.

> Right to Restrict or Object

You can restrict or object to any unfair and unlawful collection or use of your personal information. You can object to any automated decision making that has a legal or similar significant impact for you and ask for the decision to be made by a person. Where you have previously provided consent, you can withdraw it at any time.

> Right to Correct and Update

You can ask us to correct and update personal information we hold about you; to provide you with the best service it is important we have your up to date personal information, such as contact details.

> Right to Delete and Be Forgotten

You can have your personal information deleted if it is incorrect or has been processed unfairly or unlawfully.

If you have withdrawn consent you can ask for your personal information to be deleted. We will keep a record of your request so we know why your personal information was deleted.

If we have provided a regulated product or service to you, we must keep your personal information for minimum periods required by law.

> Right to Access

You have the right to know what personal information we hold about you and to receive a copy of your personal information.

We must tell you:

- why we hold it,
- who we pass it to, including whether we transfer it outside the EU,
- how long we keep it for,
- where we got it from; and
- if we carried out any automated-decisions, and if so, the logic behind it and what it means for you.

To access your personal information please write to us using the contact details in section 8 of this Privacy Notice. To help us respond as quickly as possible please let us know if you are only looking for copies of specific personal information.

You may also request a copy of personal information held by us in an automated format, that you gave us, including through your interactions with us. You can receive this in a machine readable format that allows you to keep it. You may also request Irish Life Health to send this personal information in a machine readable format to another company. The format will depend on our ability to provide this in a secure way that protects your personal information.

9 HOW TO CONTACT US

You can contact with any questions about your personal information and this privacy notice:

Irish Life Health

Block D, E, F

Lower Abbey Street

Dublin 1

+353(0)21 4802040

<https://www.irishlifehealth.ie>



10 IRISH LIFE DATA PROTECTION OFFICER

Irish Life Health also has a Data Protection Officer that you can contact directly:

Irish Life Health Data Protection Officer

Irish Life Health

Block D, E, F

Lower Abbey Street

Dublin 1

+353(0)21 4802040



11 COMPLAINTS

If you do not think that we have processed your personal information in line with this Privacy Notice, please contact us.

If you are not happy with how we have processed your personal information or handled your privacy rights, you can complain to the Data Protection Commission by contacting them below:

Data Protection Commission,
Canal House, Station Road,
Portarlinton,
Co. Laois, R32 AP23

+353 761 104800

1890 252231 (LoCall)

info@dataprotection.ie



2 STATEMENT OF CONSUMER RIGHTS AT RENEWAL

WHAT RIGHTS DO I HAVE IN RELATION TO RENEWING MY POLICY?

As a private health insurance customer, you have many rights. You have the right to renew cover regardless of your age, gender or health. All health insurers are obliged to accept all applicants regardless of risk. Once you have health insurance, an insurer cannot stop cover or refuse to renew your insurance, except in limited circumstances such as non-payment of premium or fraud.

WILL MY AGE AFFECT MY INSURANCE PREMIUM?

Until April 2015 everyone was charged the same premium for a particular health insurance plan, irrespective of their age, gender and the current or likely future state of their health. This is called community rating. On 1st May 2015, the Government introduced Lifetime Community Rating legislation. Under this legislation, community rating has been changed to reflect the age at which a person takes out private health insurance. Late entry charges are applied to the premiums of those who join the health insurance market at age 35 or over. Therefore, if an individual did not have health insurance before 1st May 2015 and is aged 35 or over, due to Lifetime Community Rating their premiums may cost more. If an individual takes out private health insurance earlier in life, and retains it, they will pay lower premiums compared to someone who joins when they are older. A discounted premium is available for all children and may be available for young adults. A discounted premium may also be available if you are in a group scheme.

CAN I CHANGE MY HEALTH INSURANCE PLAN OR INSURER?

You have the right to change your health insurance plan or insurer at your renewal date without penalty. It is also in your interest to review the level of cover that you have at renewal, to ensure the benefits continue to meet your needs at that time. The insurer may not impose additional waiting periods unless you are upgrading your cover. Even when you are upgrading your cover, an insurer may only impose an extra waiting period in respect of additional cover in the new policy. However, if you allow your health insurance to lapse for 13 weeks or more, you may have to serve your waiting periods again and Lifetime Community Rating loadings may apply to your premium.

WHAT HAPPENS IF I SWITCH FROM MY CURRENT INSURER AND WISH TO RETURN TO THEM AT A LATER DATE?

In general health insurance policies are twelve month contracts. If you switch insurer and later decide you want to switch back, you may do so at your next renewal date. In some cases, insurers allow policyholders to switch contracts during the twelve month contract term. The insurer may charge you a mid term cancellation fee to do this. The insurer may only impose waiting periods for any extra benefits available on your new plan.

CAN AN INSURER REFUSE TO SELL ME A PARTICULAR PLAN?

No. An insurer must sell you the policy you request. Some plans are marketed towards certain groups such as companies or professions but you are entitled to purchase these plans regardless of whether or not you are a member of the group to which it is marketed.



