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Data Protection and Privacy Policy

Effective Date: 24/03/2026
Version: 1.9

Your personal data is your property.

In doing business with us, you are trusting us to take care of it. This document describes how we collect data, what we use it for and how we protect it.

its4women GetSetGo Game-Changing Insurance BOXYMO.IE

MCL Insurance Services (Ireland) Limited trading as Its4women.ie, GetSetGo.ie and Boxymo.ie is regulated by the Central Bank of Ireland.

Registered Office: Unit No. 1, Third Floor, The Chamber Buildings, North Street, Swords, Co. Dublin, K67A3H7. Registered in Ireland, Registration No. 605082.

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Section 1.0 | Company Information

1.1 Our Identity

MCL Insurance Services (Ireland) Limited ("MCL") trading as Its4women.ie, GetSetGo.ie, and Boxymo.ie is a private limited company registered in the Republic of Ireland, **CRO Number:** 605082. **Registered Office:** Digital Office Centre, Balheary Demesne, Balheary Road, Swords, K67E5A0.

MCL Insurance Services (Ireland) Limited ("MCL"), trading as Its4women.ie, GetSetGo.ie, and Boxymo.ie, is regulated by the Central Bank of Ireland under the European Union (Insurance Distribution) Regulations 2018. Our Central Bank reference number is C178464. You can verify our authorised status on the Central Bank of Ireland's public register at www.centralbank.ie.

1.2 Our Services

MCL delivers a range of regulated and supporting services within the insurance sector, including:

Insurance Distribution & Intermediary Services

- Insurer agency management
- Supply of insurance products
- Introduction of insurance products to consumers

Compliance, Governance & Oversight

- Training and compliance activities
- Regulatory support
- Auditing

Risk, Analysis & Fraud Prevention

- Statistical and risk analysis
- Fraud detection
- Credit checking

Financial & Administrative Services

- Making and receiving payments
- Management of direct debit payments

Technology & Operational Support

- Maintenance and management of IT systems

Section 2.0 | General Information

MCL is committed to maintaining the highest standards of privacy and data protection. This policy explains how and why we collect your personal information, how we use it, the circumstances in which it is shared, how long we retain it, the legal bases under which we operate, and the rights you hold as a data subject.

2.1 Updates to This Privacy Policy

We may update or amend this Privacy Policy from time to time to reflect changes in legislation, regulatory expectations, industry standards, or to improve transparency. Where changes are made, updated versions will be published on our websites. You are encouraged to review the policy periodically to remain informed about how your personal information is managed.

2.2 Applicable Legislation

MCL processes all personal data in strict adherence to the General Data Protection Regulation (EU) 2016/679 (GDPR), the Data Protection Act 2018, relevant ePrivacy regulations, and applicable Central Bank of Ireland regulatory obligations. These laws require us to process personal data lawfully, fairly, transparently and securely.

2.3 Queries, Complaints and Contact Details

If you wish to exercise your data protection rights or raise concerns regarding the processing of your personal information, you may contact our Data Protection Officer (DPO) on the contact details below:

Data Protection Officer
PO Box 151
Letterkenny
Co. Donegal
Email: compliance@mclinsurance.ie

You also retain the right to lodge a complaint with the Data Protection Commission (DPC) in Ireland, which oversees compliance with data protection law. The contact details for the Data Protection Commission is as follows:

The Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Tel: +353 (0)578 684 800 / +353 (0)761 104 800
Fax: +353 57 868 4757
Email: info@dataprotection.ie

2.4 Discussing Your Personal Data

To comply with the Data Protection Act and to ensure your personal information is kept safe and secure, we may request information from you to verify your identity before discussing your personal details. We will be unable to discuss your policy or personal details with anyone else unless you give explicit verbal or written consent for us to do so.

If you would like to give consent for someone else to discuss your policy or personal details, please contact our Customer Services Team by telephone or write to us at the address(s) outlined in **Section 2.3 'Queries, Complaints and Contact Details'** including a hand signed request along with the individual's full name and date of birth.

Section 3.0 | Collection of Customer Data

MCL collects personal information solely for legitimate and defined purposes associated with the provision, administration, regulation and improvement of insurance services.

3.1 How We Collect Personal Data

When gathering personal data, which is required to provide you with a policy, we may need to:

- Obtain personal information directly from you, other insurance companies or anyone else insured under your policy;
- Obtain personal information from third parties involved in an incident with you and/or anyone insured under your policy of insurance. This may include other drivers, passengers of your or any other vehicle, pedestrians, witnesses (whether independent or otherwise), neighbours, other insurance companies, solicitors representing any third party (whether in civil or, where applicable, criminal proceedings), any other expert appointed by a third party, any person at any relevant trial, inquest or any other hearing, or any other relevant person involved in the claims process;
- Carry out credit searches internally or with one or more credit checking or credit reference agencies;
- Carry out searches, whether online (via websites with publicly available information and various industry websites), through various media outlets (including, without limitation, newspapers, television, and radio) or otherwise (including, without limitation, State and/or industry registers); and/or
- Obtain personal data from the emergency services, such as the police, ambulance and fire services, and any other relevant investigatory body or authority (mainly in claims related circumstances).

We may request details about you or anybody else insured under your policy of insurance (including named drivers or people who live at the insured property) regarding your or their health, any medical conditions which may affect yours or their ability to drive and/or the commission of alleged commission of or conviction for any relevant offence by you or anybody else insured under your policy of insurance.

3.2 Use of Third-Party Databases

To verify the accuracy of information and assess levels of risk, we consult external databases. These may include:

- The National Vehicle File for vehicle verification
- InsuranceLink for claims history checks
- The Department of Transport for driving licence data, and;
- Credit reference agencies such as Experian for affordability and risk assessments

By supplying an Eircode and an address of a property when you are taking out an insurance policy, we will carry out a search of a third-party database to determine location-based risk factors called “Geocoding”. This search will return information relating to the topographical nature of the area in which your property is located as part of the normal insurance quotation process. This information is used to support us in rating your risk level when providing you with a quotation.

3.3 Legal Obligation to Provide Accurate Information

Insurance policyholders are legally required to provide correct and complete information. Failure to provide accurate data may result in policy cancellation, refusal of claims, additional premium charges, or difficulties obtaining insurance in the future. It may also trigger regulatory reporting responsibilities.

Section 4.0 | Use of Information

MCL processes personal data only where necessary and in accordance with clearly defined legal bases.

4.1 Purposes and Legal Bases for Processing

We use personal information to verify your identity, assess your eligibility for insurance, calculate premiums, handle claims, manage customer relationships, fulfil regulatory requirements, and improve digital and operational performance. Much of this processing is necessary for the performance of a contract with you or to take steps at your request prior to entering into a contract. Some activities, such as fraud prevention and regulatory reporting, are required by law. We also rely on legitimate interests for certain operational activities such as analytics, system improvement and monitoring, where such interests do not override your fundamental rights. Marketing communications are carried out only with your explicit consent.

4.2 Processing of Special Categories of Data

Certain types of personal information, including health details or driving convictions, are considered “special categories” of personal data and are afforded enhanced protection under GDPR. We only process such data when permitted, for example where necessary for claims assessment, fraud prevention, legal defence, or where you have provided explicit consent.

4.3 If You Do Not Provide Required Information

If you decline to provide information necessary for quotation, underwriting or the administration of your policy, we may be unable to provide insurance cover. Likewise, failure to provide claims-related information may lead to our inability to progress or pay a claim. Regulatory obligations may also prevent us from offering services in the absence of required information.

4.4 Call Recording

We may record or monitor telephone calls to ensure accurate records, support training and quality assurance, assist in fraud prevention, enable regulatory compliance, and resolve customer complaints. These recordings form part of your personal data and are stored securely.

Section 5.0 | Sharing of Information

MCL shares personal data only where necessary, proportionate and supported by a valid legal basis.

5.1 External Disclosures

Personal information may be shared with insurers, underwriters, reinsurers, claims assessors, legal advisors, medical professionals, repair networks, IT service providers, fraud prevention bodies, payment processors, postal services, and regulatory authorities. Sharing occurs either to fulfil contractual obligations, meet legal requirements, prevent fraud, or ensure efficient claims handling.

5.2 Internal Disclosures

Information may be shared within **MCL** departments where necessary to assess underwriting criteria, resolve complaints, administer policies, investigate claims or comply with regulatory requirements. Such internal sharing is carried out in accordance with strict access controls and internal governance protocols.

5.3 Transfers Outside the EEA

Where data transfers outside the European Economic Area (EEA) are required, we apply GDPR-compliant safeguards. These may include the use of Standard Contractual Clauses, adequacy decisions, additional encryption measures and Transfer Impact Assessments (TIAs) to ensure equivalent levels of protection

Section 6.0 | Data Collected

As an insurance intermediary we need to collect many categories of personal data about you and other parties for the purposes set out in this Data Protection & Privacy Policy. The exact categories may change from time to time. However, we feel that it is important that you know what types of information that we gather and use.

Please note: We have obtained most of the data directly from you. Data may be gathered in relation to both you and other people who are insured under your policy such as named drivers or others who live with you at the insured property.

6.1 Policy Information

This includes personal and policy-related details necessary for providing, administering and renewing insurance products. Such information may include:

- Name, address (including Eircode) and contact details
- Date of birth, gender, employment information and years of residency in Ireland
- Health insurance policy information (where relevant)
- Driving licence details and vehicle and/or property information
- Telephone call recordings and, for telematics policies, location data
- Renewal dates and marketing preferences
- Bank account and payment card details, records of payments and arrears
- Driving history, claims history, and information relating to relevant criminal convictions, disqualifications or penalty points

6.2 Claims Information

This includes information required to understand, assess or support the management of claims by the underwriter. Depending on the circumstances, this may include:

- Details of the incident, including the sequence of events and parties involved
- Health-related information (injuries arising from the incident, prior relevant conditions and subsequent medical impacts)
- Criminal conviction information where relevant to the incident
- CCTV or video footage
- Information regarding damaged property, repair estimates, costs, payments and recoveries
- Details of services provided following an incident (e.g., car hire, vehicle repairs, property repairs)

6.3 Information Obtained from Other Sources

We also obtain certain information from external or third-party sources to verify accuracy, assess risk or support regulatory compliance. This may include:

- Penalty point information and driving licence data
- Precise address verification and geocoding information
- Claims history, vehicle details and vehicle history
- Credit scores or credit reference information
- Website usage data, IP addresses and other online identifiers

If you would like more information about the information we gather and use please contact us in writing, at the address outlined in **Section 2.3 'Queries, Complaints and Contact Details'**. The above information is required for the purposes specified in **Section 4 'Use of Information'**.

Section 7.0 | Retention of Customer Data

MCL retains personal data only for as long as it is necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory, contractual or operational requirements. Retention periods are determined by insurance industry standards, statutory obligations under Irish and EU law, regulatory expectations set by the Central Bank of Ireland, and the data-minimisation principles outlined in Article 5(1)(e) GDPR.

7.1 Quotation Data

Quotation data is typically retained for twelve months. This allows us to respond to follow-up queries, address underwriting disputes, verify information if a customer reapplies, and detect potential quote manipulation or fraud.

7.2 Policy Data

Policy-related information is retained for the duration of the policy and for six years thereafter. This aligns with statutory limitation periods for contract claims and regulatory requirements for financial services.

7.3 Claims Data

Claims-related information is retained for the lifetime of the policy and for at least six years after the claim has closed. Where legally justified—such as in long-tail liability cases, personal injury matters, fraud investigations, or regulatory inquiries—data may be retained for longer.

7.4 Call Recordings & Operational Data

Call recordings, correspondence, telematics information (where applicable), and system logs may be retained for between one and seven years, depending on their purpose, evidential value and regulatory significance.

7.5 Secure Deletion & Anonymisation

When the relevant retention period expires, **MCL** follows documented destruction or anonymisation procedures to ensure the secure and irreversible removal of personal data. Anonymised information that can no longer identify an individual may be used for legitimate business purposes such as statistical analysis, product development and risk modelling.

Section 8.0 | Automated Decision-Making

We use automated systems to support underwriting, premium calculation, risk scoring and telematics analysis. These systems assist us in evaluating risk fairly, consistently and efficiently. However, GDPR gives you the right to request human review of decisions that have a legal or significant impact on you. You may also challenge such decisions and request further explanation of the logic involved.

Section 9.0 | Your Rights

Under the General Data Protection Regulation (GDPR), you have several important rights designed to give you control over your personal information. **MCL** is committed to respecting and facilitating these rights. Each right is described in detail below, including what it means, when it applies, and how you may exercise it.

9.1 Right to Be Informed

You have the right to receive clear, transparent and easily understandable information about how your personal data is collected, used, stored, shared and retained. This Privacy Policy is intended to fulfil that requirement. If you require additional clarification on any aspect of this policy, you may contact us directly.

9.2 Right of Access

You have the right to request a copy of the personal data we hold about you, as well as information about how and why it is being processed. This is known as a Data Subject Access Request. We will provide this information within one month unless an extension is permitted due to complexity.

When you make a request, we would ask that you provide us with as much information as possible to assist us in identifying you (such as your name, address, and policy number) and the information you want access to. We need to be certain who you are when you make a request. As a result, we will require you to provide photographic identification (including your signature e.g. driving licence) to deal with your request, for verification purposes. If you do not provide us with enough information, we may need to contact you for clarification.

If there are any additional drivers, joint proposers or any other insured person listed on your insurance policy, we will require written authorisation from them, including photographic ID outlining their signature to complete your request as their personal details will also be included on your policy.

We will not charge a fee for any of the requests under this section if we do not consider them to be unjustified or excessive. If we consider a request to be unjustified or excessive, we may either deal with the request and charge a fee or refuse the request. We may also charge a fee if you ask us to send you further copies of the information in an access request.

9.3 Right to Rectification

If any personal information we hold about you is inaccurate, incomplete or out of date, you have the right to request that we correct or update it. We will amend the data without undue delay and confirm once updates have been made. If your data has been shared with third parties (e.g., underwriters), we will inform them of the correction where feasible.

9.4 Right to Erasure ("Right to Be Forgotten")

In certain circumstances you have the right to have the personal data concerning you erased. However, if we are in the middle of your policy then it may affect our ability to provide certain services under your insurance policy. You may only request the deletion of your data where one of the following situations applies:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- Where the data is processed on the legal basis of consent, you withdraw consent, and no other legal ground permits the processing;
- The data subject objects to the processing and there are no overriding legitimate grounds for the processing
- The personal data have been unlawfully processed; or
- The personal data must be erased for compliance with a legal obligation

However, this right shall not apply in certain situations, including where the processing of data is necessary for one of the following reasons:

- For exercising the right of freedom of expression and information;
- For compliance with a legal obligation, such as the performance of a contract (i.e. your insurance policy or a quote) or compliance with legislation (for example the Consumer Protection Code 2025, which requires us to retain data for at least 6 years);
- For statistical purposes, where the Right of Erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- For the establishment, exercise, or defence of legal claims

Where you request the erasure of personal data, we will need to keep a record of your request, so we know that the deletion has happened and why. This is because we are required by our regulator, the Central Bank of Ireland, to retain records of what we do in relation to our regulated activities. However, we will keep the record in such a way as to remove as much of the information you have asked us to delete as possible, while accurately reflecting the activity.

In certain circumstances we may need to retain some information to ensure all your preferences are properly respected. For example, we cannot erase all information about you where you have also asked us not to send you marketing material. Otherwise, we would delete your preference not to receive marketing material.

9.5 Right to Restrict Processing

You may request that the use of your personal data be limited in certain situations. Restriction may apply where:

- You contest the accuracy of the data (restriction applies while accuracy is verified)
- Processing is unlawful and you prefer restriction instead of deletion
- The data is no longer needed but you require it for legal claims, or
- You have objected to processing and a review is pending

Where processing is restricted, we will store your data but will not use it unless necessary for legal claims, public interest or with your consent.

9.6 Right to Data Portability

You have the right to receive certain personal data in a structured, commonly used and machine-readable format. You may also request that we transfer such data directly to another service provider, where technically feasible. This right applies only to data you provided to us and processed under consent or contract, and only to automated processing.

9.7 Right to Object

You may object to processing of your personal data where it is based on:

- Our legitimate interests, or
- The performance of a task carried out in the public interest.

If you object, we will stop processing the data unless we can demonstrate compelling legitimate grounds that override your rights or unless processing is needed for legal claims.

You always have the absolute right to object to direct marketing.

9.8 Rights Related to Automated Decision-Making and Profiling

Where automated processes are used to make decisions that may significantly affect you such as underwriting decisions, pricing, fraud assessments or telematics scoring you have the right to:

- Request human intervention
- Express your point of view
- Contest the decision
- Receive an explanation of the logic involved

We ensure regular testing, validation and fairness assessment of automated systems.

9.9 Right to Withdraw Consent

If we are processing your information on the legal basis of consent, you are entitled to withdraw your consent at any time. Therefore, if we are relying on your consent to allow us to carry out an activity and then you withdraw your consent, we would not be allowed to use your personal data for that activity from that point forward. However, it would not invalidate any processing we carried out prior to your withdrawal of consent.

We do not generally rely on consent for processing personal data in relation to insurance contracts; we generally rely on other legal bases, such as the basis that the processing is required for entering into and performing a contract with you. More details on the legal bases on which we rely are set out in **Section 4 'Use of Information'**. For details on how to withdraw your consent for marketing see **Section 12 'Marketing Information'**.

9.10 Right to Lodge a Complaint

You have the right to lodge a complaint with the Data Protection Commission (DPC) if you believe that your personal data has been processed unlawfully or if you are dissatisfied with our response to a rights request. The contact details for the Data Protection Commission is as follows:

The Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Tel: +353 (0)578 684 800 / +353 (0)761 104 800
Fax: +353 57 868 4757
Email: info@dataprotection.ie

You may also raise concerns with your local supervisory authority if you reside outside Ireland.

Section 10.0 | Specific Service Providers

We work with specialised service providers to support credit checking, driving licence verification, fraud detection (including use of InsuranceLink), telematics assessments and other essential functions. These providers act under strict contractual instructions and are required to maintain GDPR-compliant safeguards.

10.1 Credit Searches and Use of Third-Party Information

In assessing your application for insurance, we may search files made available to us by credit checking or credit reference agencies.

We may also pass credit reference agencies information about you and your payment record. The information will be used by other credit lenders for making credit decisions about you and the people with whom you are financially associated for reasons including, without limitation, fraud prevention, money laundering prevention and for tracing debtors.

We may ask credit reference agencies to provide credit scoring computations. Credit scoring uses many factors to work out risks involved in any application. A score is given to each factor and a total score obtained.

Where automated credit scoring is used by us, acceptance or rejection of your application will not depend only on the results of the credit scoring process but may impact your premium and we will enable you to make representations in relation to the result of the search. See **Section 8 'Automated Decision-Making'** for more information.

10.2 Penalty Points and Criminal Conviction Information

We may obtain data on any penalty points which may include the number and reasons for same and driving convictions you may have. The Department of Transport, Tourism & Sport (DTTS) in the Republic of Ireland.

Where you request a quotation, we may use your driving licence number and the driving licence numbers of all drivers named on your policy (if any) to obtain such information from the DTTS or the DVLA for determining your eligibility and (if you are eligible) your premium. We may obtain such information for your current policy of insurance, for the renewal of your policy in every subsequent year for which you are a policyholder and where there is a change of permitted drivers on your policy.

Where these checks are used by us, acceptance or rejection of your application will not depend only on the results of this process but may impact your premium and we will enable you to make representations in relation to the result of the search.

10.3 Insurance-Link Central Database

The Insurance Link Database has been created by Insurance Ireland and the self-insured claims task force to assist their members in the detection and defence of exaggerated claims which may result in prosecutions for fraud.

It contains details of claims made by individuals against insurance policyholders or directly against self-insured members of the service. The purpose of Insurance Link is to help identify incorrect information and fraudulent claims and, therefore, to protect customers.

Information about claims (whether by our customers or third parties) made under policies that we provide is collected by us when a claim is made, and some details are placed on the Insurance Link database.

This information includes the claimant's name, address and date of birth and the type of injury or loss suffered. Through Insurance Link this information may be shared with other insurance companies, self-insurers, or statutory authorities.

We also reserve the right to use the Insurance Link Database during the underwriting stage. To do this, we obtain the information via an authorised third party – "Verisk". We may need to contact you to discuss our findings and request additional documentation. If you feel the information is inaccurate or no longer up to date, we encourage you to contact the Insurance Link Department. More information about Insurance Link and their contact information can be found at www.inslink.ie.

Section 11.0 | Communication with Customers

We may contact you to provide policy documentation, discuss renewals, process claims, issue payment reminders, deliver regulatory notices, or share marketing information where consent has been given. Communications may be sent by post, email, telephone or digital channels.

From time to time, we may contact you by telephone, email or SMS in connection with various aspects of your relationship with us. These communications will relate to the purposes set out in this Data Protection & Privacy Policy and may include, without limitation:

- Administration of your insurance policies
- Discussion of renewal terms for existing policies
- Notifications that your policy is due for renewal
- Periodic reminders that your renewal date is approaching
- Confirmation that a policy has not been renewed and has lapsed
- Discussions regarding quotations already provided
- Follow-up emails shortly after providing a quotation, including details and a link to retrieve it
- Reminder emails prior to the expiry of any quotations
- Handling of complaints
- Claim-related queries
- Marketing of products and services and special offers (where consent has been provided)
- Conducting market research

Other than at your request, we will not make calls to you outside the hours of 9am – 8pm, Monday to Saturday. Our office hours including our Contact Centre operates Monday to Friday, 9am - 5pm. Other than Sundays, our office is closed:

- New Year's Day
- Easter Monday
- Christmas Day and;
- Boxing Day

However, our online service is available 24 hours a day, 7 days a week.

Section 12.0 | Marketing Information

Where you have told us that you are happy to receive marketing information from us or our business partners, we may contact you from time to time about other products that we think may be of interest to you, now and in the subsequent future. This will include on the 12-month anniversary of a quote not taken up or your policy lapsing. This quotation will be based on the details held for you on our system. If these details are no longer accurate, we will be more than happy to update them for you. If you have completed more than one quotation, each will follow this process.

To do this we may contact you by post, email, and telephone (including mobile telephone) using the contact details you have provided to us.

In order to improve our customer service, we may use your data to analyse customer purchasing behaviour (such as time of day, channel used, level of cover) and customer data (such as name, address, renewal dates) to determine the most appropriate marketing offer for you. If you have subscribed to our mailing list, we will continue to hold your full name, email address, and contact number for marketing purposes until such times as you "Opt-Out" of this service.

All marketing material will provide you with the opportunity to unsubscribe from our mailing list. If you chose to unsubscribe or "Opt-Out" you will no longer receive great offers and information about our products and services. You can "Opt-Out" at any time by writing to us.

Existing customers can remove their details from our mailing list at any time; however, we will still contact you in relation to your insurance policy.

Section 13.0 | Processing of Information

We analyse how users interact with our website—including pages visited, navigation patterns and general browsing behaviour—to help us understand which areas are performing well and which may require improvement. This information allows us to enhance user experience, optimise website functionality, and ensure our digital services operate efficiently and securely.

Some of this analysis is carried out using cookies and similar tracking technologies. Essential cookies, which are required for the website to function properly, will always operate. However, non-essential cookies—such as those used for analytics, advertising, personalisation or to measure the effectiveness of online campaigns—will only be activated where you have provided your explicit consent. You can manage or withdraw your consent at any time through our cookie settings.

Section 14.0 | Security of Customer Data

MCL implements extensive technical and organisational measures to protect personal data from unauthorised access, loss, misuse or disclosure. Our security framework is designed in line with industry best practice and includes multiple layers of protection to safeguard the confidentiality, integrity and availability of information. These measures include, but are not limited to:

- **Encryption:** We apply industry-standard encryption protocols to protect data both in transit and at rest, ensuring that information cannot be read or accessed without proper authorisation.
- **Network and Infrastructure Security:** Firewalls, intrusion detection and prevention systems, and continuous network monitoring safeguard our systems from external threats and suspicious activity.
- **Secure Hosting Environments:** All data is stored within secure data centres that employ robust physical and environmental controls, including restricted access zones, CCTV monitoring, and resilient infrastructure.
- **Access Controls:** Access to personal data is strictly limited to authorised personnel who require it to fulfil their job responsibilities. We use multi-factor authentication, role-based permissions, and audit logging to ensure controlled and traceable access.
- **Testing and Monitoring:** We conduct regular vulnerability scanning, security assessments, and independent penetration testing to identify and address potential weaknesses.
- **Policies and Governance:** Our internal policies, procedures and incident response plans ensure that data protection and information security are embedded across our operations.
- **Training and Awareness:** All employees receive ongoing data protection and security awareness training to ensure they understand their responsibilities and follow best-practice handling guidelines.

We continually review, update and strengthen our security controls to protect against evolving cyber threats, emerging risks and technological advancements. Our commitment to maintaining a secure environment ensures that your personal data is protected throughout its lifecycle.

Section 15.0 | Use of Cookies

Our websites use cookies and similar technologies to support essential site functionality and to help us deliver a smoother, more personalised browsing experience. Cookies enable features such as secure login, navigation, form submissions and the correct display of content across different devices. We categorise the cookies we use as follows:

- **Essential (Strictly Necessary) Cookies:** These cookies are required for the website to function properly and cannot be switched off. They support core activities such as page loading, security features, and access to protected areas. Without them, our website would not operate correctly.
- **Functional Cookies:** These cookies enhance performance and usability by remembering your preferences—such as language settings, form information or tailoring content to your device. They help improve your overall experience but are not strictly required for the site to run.
- **Analytics and Performance Cookies (Consent-Based):** These cookies help us understand how visitors interact with our website. They collect information such as the pages you visit, how long you spend on the site and any issues you encounter. We use this data to improve website performance, content relevance and usability. These cookies will only operate if you have provided consent.
- **Advertising and Targeting Cookies (Consent-Based):** These cookies allow us and our advertising partners to deliver more relevant marketing content, measure campaign effectiveness, and limit the frequency of certain advertisements. They will only be activated once you have given your explicit consent.

You can manage your cookie preferences at any time using our cookie management tool, which allows you to enable or disable non-essential cookies according to your preferences. You can also withdraw your consent whenever you choose, and your updated settings will be applied immediately.

Section 16.0 | Software Quality

Although **MCL** takes all reasonable steps to maintain secure, reliable and up-to-date systems, no digital environment can be guaranteed to be completely free from malware, cyber-attacks or potential security vulnerabilities. We implement industry-standard controls and continuously monitor our systems; however, the evolving nature of cyber threats means we cannot provide absolute assurance.

We therefore encourage users to take appropriate precautions when accessing our digital services. This includes using secure and trusted devices, keeping software and security tools updated, and exercising care when clicking links, opening attachments or submitting personal information online.

MCL Insurance Services (Ireland) Limited is committed to protecting your privacy. This Data Protection & Privacy Policy explains how we collect, use, store and safeguard the personal information we obtain about you ("Customer Data"). It also outlines the circumstances in which we may share your information, the legal bases on which we rely, the choices available to you, and your rights to correct or update any inaccurate data we hold.

Where your insurance policy includes or affects other individuals—such as joint policyholders, family members, or anyone living at the insured property—you must ensure that these individuals are aware that their personal information may be shared with us and processed as described in this Policy. By proceeding with your policy, you confirm that you have obtained all necessary permissions and that the individuals concerned understand how their information may be used.