

Why have terms of business?

This document protects you. It's required by the Central Bank of Ireland. It's important that you read it in full. If there's anything in it that you don't understand or if you would like more information on any of these matters, please let us know.

These Terms of Business are effective from 14 June 2018.

Who is No Nonsense?

No Nonsense is a trading name of FBD Insurance plc. FBD Insurance plc (trading as No Nonsense) is subject to the Minimum Competency Code 2011 and the Consumer Protection Code 2012. These codes help to protect you and you can view them in full at www.centralbank.ie.

We are registered in the Companies Registration Office under company no 25475 and are registered for Value Added Tax (VAT), registration number 9F72885E. The registered office of FBD Insurance plc is at FBD House, Bluebell, Dublin 12.

We are authorised by the Central Bank of Ireland as a non-life insurance company. We are a member of Insurance Ireland and we abide by its voluntary code of conduct.

What services do we offer?

We provide motor and home insurance. These products are underwritten by FBD Insurance plc. In other words, we take the risk and pay you if you have a valid claim. Where motor or home emergency assistance is included under your policy, the service is provided by Mapfre Assistance Agency Ireland on our behalf.

How can I contact you?

For policy queries, contact us:
by phone – 1890 25 27 37
by email – info@nononsense.ie
by post – PO Box 11225, Dublin 12.

What law applies?

The laws of Ireland will apply to your policy.

What if we have a dispute about a claim?

Any dispute under the policy between you and us must be referred to arbitration. Together, we will agree to the appointment of the arbitrator but if we cannot agree, an arbitrator will be appointed by the authorised body identified in the current arbitration legislation. An arbitrator is an independent third party who hears both sides of a disagreement and then makes a decision to resolve the problem. If a disputed claim is not referred to arbitration within 12 months of your claim being turned down, we will treat the claim as abandoned.

How can I pay for my insurance?

You can pay for your insurance policy with us:

- annually by credit card or debit card, or
- by direct debit instalments (availability subject to acceptance criteria).

If we offer you direct debit payments, the first payment must be paid by credit or debit card. The direct debit service charge can vary but you will be told what it is before you complete the direct debit instalment agreement.

Direct debit payments may also continue to be collected automatically when your policy falls due for renewal. If you do not wish to continue to pay by direct debit, you should let us know.

Please note that if you fail to pay premiums that are due, or if a direct debit is unpaid, we may cancel your insurance cover in line with the terms and conditions of your policy. If your policy is cancelled this may affect your eligibility for insurance with us as well as other insurers in the future.

How do you deal with claims?

We will deal with your claim fairly and efficiently within the terms of your policy. We will make every effort to make sure you are provided with a high level of customer service.

Remember that you may be responsible for an initial amount of your claim known as an 'excess'. You'll be told about this when you're buying your policy, and it will also be printed on your policy documents.

You can engage, at your own expense, the services of an appropriate expert or advisor to act on your behalf, like a Public Loss Assessor. In the case of property insurance claims, we reserve the right to settle your claim with a cash payment or to use our own service providers to reinstate, repair or replace the damaged property.

What are my cancellation rights?

Can I cancel my policy?

Yes. You may cancel your policy at any time. Just write to us with your cancellation instructions. In the case of car insurance, you must return the insurance certificate and the insurance disc to us as well. We will cancel the policy from the date we receive your instructions and the insurance certificate and disc, if appropriate.

Can you cancel my policy?

Yes. If we cancel your policy, we will send you seven days' notice (10 days' notice in the case of motor vehicle insurance policies) by letter to your last known address.

Will I get a refund?

Provided there hasn't been a claim on your policy and no claim is pending, we will refund you as follows:

Home insurance

We will refund the premium you paid less the amount due for the time you have been on cover. We will also charge an administration fee in line with the following table:

If you cancel your policy in the first year of insurance	Premium payment	Administration charge
	Up to €500	€50
	€501 to €1,000	€60
	€1,001 to €2,000	€75
	€2,001 and over	€100
If you cancel the policy any time after the first year	A €40 flat administration charge applies	

Car insurance

We will refund you in line with the following table:

Period of cover not more than	Percentage due back
One month	80%
Three months	60%
Six months	40%
Nine months	20%
Over nine months	No refund

If you or No Nonsense cancel your policy and you are due money back, we will, with your agreement, offset this money against any payments due on any other policy you have with us.

If we cancel your policy because you:

- gave us incorrect information,
- did not send us valid documents, or
- did not send us documents in the timeframe we set out,

we will charge a €50 administration fee.

Is there a cooling off period?

Yes. Every policy we sell has a 'cooling off period'. This is 14 days from the date you take out the insurance or 14 days from the date you receive your policy documents – whichever is the later date. If you cancel your policy within the cooling off period we will refund the premium you paid less the amount due for the time you have been on cover. We will not deduct an administration fee from the refund.

Is there a charge for making changes to my policy?

Administration Fee

We charge a €25 administration fee for any changes you make to your policy or any request for replacement documents.

Green Cards

If you request it, we charge €25 for the issue of each Green Card for driving abroad.

Mid Term Changes

If a change is made during the period of insurance which increases or reduces your insurance payment by €10 or less, we don't charge the increase or refund the reduction. If it's more than €10, we will charge the increase or refund the reduction.

What happens if there's a conflict of interest?

We aim to avoid conflicts of interest. However, should an unavoidable conflict arise, we'll let you know about it. If you feel that a conflict of interest exists or that your interests have not been fairly protected, please contact us to give us the chance to make things right.

How do I give feedback or make a complaint?

We would like to hear from you if you have any feedback or complaints about our service. Letting us know your concerns allows us to try and put matters right for you and to improve our service to all our customers.

If you would like to give us feedback or make a complaint, please contact us at 1890 25 27 37 or email us at info@nononsense.ie.

We have a complaints process to ensure your complaint is addressed. If you are not satisfied with our response or how we have dealt with your complaint, you may refer your case to:

Financial Services and Pensions Ombudsman,
Lincoln House, Lincoln Place, Dublin 2, D02 VH29.
Phone: + 353 1 567 7000
Email: info@fspoi.ie
Website: www.fspoi.ie

What is SmartDriver and the Top Driver App?

SmartDriver

The SmartDriver device is an electronic transmitting device which is fitted to your vehicle's OBD (on board diagnostics) port or battery. The SmartDriver device will measure and transmit information about how the vehicle is being driven. These data measurements will include information such as date, location coordinates, braking frequency and force, cornering and acceleration.

This information will be used to determine your driving behaviour and calculate your driver score. Within 14 days of receiving your SmartDriver device, you must install it in your vehicle and keep it installed for at least six months. To avail of rewards for safe driving with a SmartDriver policy, your SmartDriver device must be installed and working.

Installing SmartDriver - The SmartDriver device has been carefully designed to enable you to install the device yourself. If you want to have a qualified mechanical engineer install SmartDriver for you, they may charge you a fee which is at your own expense

Returning SmartDriver - The SmartDriver device is owned by No Nonsense and is issued to you for a period of up to six months. When we ask you to return the device, you must do so within 14 days.

If you or No Nonsense cancel your policy, No Nonsense will retain €125 from any cancellation refund until you have returned the SmartDriver device to:

Freepost, No Nonsense Insurance, PO Box 11225, Dublin 12.

TopDriver App

The TopDriver Application (App) is a mobile application which can be installed and used on iPhone and android mobile devices to measure your driving behaviour.

TopDriver does not provide you with any insurance cover and it is not evidence that you hold an insurance policy with No Nonsense.

How does TopDriver work?

The TopDriver App uses data gathered by your mobile device such as the time, date and location. The TopDriver App only records this data when you activate the app at the start of your journey and deactivate it once you reach your destination. The app uses GPS (global positioning system) data to locate your mobile device and GPRS (general packet radio service) data to send the information to No Nonsense.

Network and roaming charges may be applied by your network operator for transferring the data from your TopDriver App to No Nonsense. Please check with your mobile network provider about the charges and fees which may be applied.

Data Protection - how will we use your information?

We will handle, manage and process personal data in line with this data protection statement for FBD Insurance, FBD Insurance plc and No Nonsense.

FBD Insurance Group Ltd trading as FBD Insurance, FBD Insurance plc and its trading name No Nonsense are wholly owned subsidiaries of FBD Holdings plc. Throughout this document when we refer to FBD Group Companies, we are referring to both of these companies. Your insurance policy is administered and underwritten by FBD Insurance plc.

If you have any questions or need more details, you can:

- read our 'Full Data Protection Statement' at <https://www.fbd.ie/dataprotection>;
- email info@fbd.ie; or
- write to FBD Data Protection Officer, FBD House, Bluebell, Dublin 12, D12 YOHE, Ireland.

This data protection statement is an overview of our Full Data Protection Statement, which applies to all your dealings with FBD group companies.

What is 'personal data'?

Throughout this statement, we refer to your personal data to mean information about:

- you,
- anyone else who is insured under your policy, or
- anyone involved in a claim relating to your policy.

This personal data may also include sensitive data, such as information about a person's health or convictions.

If you give us personal data about someone else, you are confirming that you will explain to them you gave us their personal data. You are also confirming that they understand their data will be processed in the ways set out here and in the Full Data Protection Statement.

What personal data do we collect?

We may ask for different types of personal data. Examples include:

- **policy data** – title, surname, forename(s), address, phone numbers, email address, previous or existing employment details, occupation and marketing preference;
- **claims data** – previous or existing claims details, medical information, PPS number and CCTV footage;
- **information from sources other than you** – vehicle details, penalty points, IP address and geocode (precise address location).

Sometimes the data we ask you for may be optional, and we will tell you if this is the case. We will also explain to you any implications of not giving us the data.

Why do we collect your personal data?

Most of the information we ask you for is to assess risk, offer insurance and process claims. We ask you for different types of personal data depending on the kind of insurance you want or the claim being processed. This allows us to manage your policy, serve you better and uphold the law.

Manage your policy

We need to process some personal data to agree and fulfil a contract with you. For example, we do this when we need to:

- verify the accuracy of the information and personal data received;
- assess your insurance needs and the level of cover you need;
- contact or respond to you;
- quote for and manage insurance and other products that we provide to you;
- underwrite policies and handle claims;
- verify and process payments or refunds;
- provide services such as help with car breakdown assistance.

Serve our customer

We also need to process personal data where we have a 'legitimate interest' to do so. Legitimate interests include:

- training and monitoring staff in how to perform their duties and serve you as best they can;
- marketing and doing market research and statistical analysis to improve services and products;
- protecting customers and ourselves from being the victims of fraud.

Before we process personal data for our legitimate interests, we carefully consider its effect on you and others. On balance, we believe that the processing we do is necessary and respects your legal rights and freedoms.

Uphold the law

We also process personal data to comply with regulatory or legal obligations. Examples are:

- Conduct of Business requirements
- Money Laundering Acts
- Employment Acts
- Road Traffic Acts
- Finance Acts

Why do we need sensitive data?

We need sensitive information about you and others connected to an insurance policy so that we can:

- offer you the best products and services,
- assess the risk of your proposed policy, and
- assess claims which may relate to medical conditions or information about motoring or criminal charges or convictions.

However, you do not need to give data about 'spent' convictions. These are convictions which, under the Children Act 2001 or Criminal Justice (Spent Convictions and Certain Disclosures) Act 2016, can be ignored after a set period of time. If you are in any doubt about whether a conviction may be spent, you can contact Citizens Information on 0761 07 4000 or visit www.citizensinformation.ie.

When you give us sensitive data, both you and anyone else on your policy are accepting that the data is necessary for us to provide your insurance. We will only process sensitive data if we have appropriate, suitable and specific measures in place to protect the data and your legal rights and freedoms.

Why do you need to give us accurate information?

If you give us incorrect or out-of-date information, we may not provide you with cover or may have to delay processing your claim. If you give false information and make a claim, it may not be paid and could result in criminal prosecution. To avoid this,

you must always give us accurate and up-to-date information, especially when seeking insurance cover or making a claim.

How do we collect personal data?

We collect personal data through your dealings with us or our appointed agents. This may be through websites, contact centres or in person.

We can also get personal data from other sources. Examples include vehicle databases, Insurance Link (a central claims database for the insurance industry – see <https://www.inslink.ie>) and public social media sites. We use these sources to help us gather and verify personal data or other information you have provided.

How do we collect personal data about children?

If you give personal data about a child under the age of 16 years, we will need to check that you are their parent or guardian. We do this to make sure you can authorise us to process personal data about the child.

How long do we keep personal data?

We hold personal data in line with our record retention policy. For most policies, this is seven years after your relationship with us ends. If you do not accept a quote or complete an application for an insurance policy, we will keep your data for 15 months. This lets us market to you at your next renewal date and process the data in line with the data protection information outlined in this document.

If there is a claim or a potential claim against a policy, we hold the data for at least seven years after any legal proceedings or potential legal proceedings have been finalised. For more information, please see Section 9 of our Full Data Protection Statement which is available at <https://www.fbd.ie/dataprotection>.

Do we assess personal data using automated tools?

Yes. When you ask about a product or service or submit a claim, we use automated procedures to assess your personal data and reach a decision. This is sometimes called 'profiling' or 'automated decision-making'. For example, if you ask for a quote, we will put your data through a computer program to calculate risk. Based on this, we may decide to offer or not to offer you a particular product.

If you want more information or would like a decision reviewed, please call 1800 617 617.

Do we share personal data?

To provide insurance cover or to process a claim, we may have to share your personal data with others. These may include employees or agents, service providers, reinsurance companies, trade bodies, private investigators, professional advisors and others involved in administering or processing your data.

To fulfil our regulatory, industry or legal obligations, we may also pass your personal data to external databases. For example:

- The National Fleet Database, a database of insured vehicles; or
- Insurance Link (<https://www.inslink.ie/>), a database of claims data which can include name, address, date of birth, type of injury or loss suffered, and property damaged.

Personal data on Insurance Link may be shared with other insurance companies, self-insurers or statutory authorities. These

third parties may keep their own record of personal data obtained from Insurance Link. See the Full Data Protection Statement on <https://www.fbd.ie/dataprotection> for more details.

Will we contact you for marketing?

If we are allowed to send you information about products, services and special offers from FBD group companies, we may contact you in different ways. This may be by mobile phone, landline, email, text message or post. We may also contact you on the anniversary of your policy lapsing or your quote request.

It is always your choice to receive marketing information or not, and you will be asked about this when you apply for a quote or buy a product or service. You can change your mind and opt out of marketing at any time by calling 1800 617 617 or emailing info@fbd.ie.

If you choose not to receive marketing information, it will not affect any of the services we provide to you, now or in the future.

What are your rights?

You have a number of rights when it comes to Personal Data. These rights may include the right to:

- Be informed if FBD Group Companies hold your Personal Data;
- Rectify your Personal Data;
- Request access to Personal Data held by FBD Group Companies;
- Object to the use of Personal Data;
- Erase Personal Data;
- Restrict the processing of Personal Data;
- Electronically transfer or receive Personal Data (right to data portability).

Some of these rights can only be exercised in certain situations. For more information about the rights relating to Personal data, please refer to section 13 of the Full Data Protection Statement at <https://www.fbd.ie/dataprotection>.

To exercise any of these rights, please submit a request to the FBD Group Companies Data Protection Officer, FBD House, Bluebell, Dublin 12, D12 Y0HE, Ireland.

You will receive a response as quickly as possible and, at the latest, within 30 calendar days of your request being received. In certain instances, this may be extended up to 60 calendar days if necessary. However, you will be informed of this in advance.

You also have a right to lodge a complaint regarding processing of your Personal Data to the Office of the Data Protection Commissioner (ODPC). You can contact the ODPC as follows:

Data Protection Commissioner,
Canal House, Station Road, Portarlington, Co Laois.
Tel: 1890 252 231
Email: info@dataprotection.ie