

Privacy Policy

Last Updated: 24th February 2026

1. Who We Are

Switched on Insurance Coöperatief U.A., trading as Switched on Insurance, incorporated in the Netherlands.

We are authorised and supervised by the Autoriteit Financiële Markten (AFM) in the Netherlands. We distribute travel insurance to consumers in Ireland on a cross-border basis under the European Union (Insurance Distribution) framework. When providing services to consumers in Ireland, we are subject to the consumer protection requirements of the Central Bank of Ireland, including the Consumer Protection Code 2025.

All sales, servicing and customer interactions are conducted digitally, either through price comparison websites or via our direct online platform.

For the purposes of data protection law, we act as the data controller in relation to personal data collected and processed in connection with our insurance distribution activities.

Registered office: Schimmelt 2 -16, kantoor, 5611ZX, Eindhoven

AFM registration number: 12050054

If you have any questions about this Privacy Policy or how we use your personal data, you can contact our Data Protection Officer at:

Email: dpo.inbox@switchedoninsurance.eu

2. Legal and Regulatory Framework

We process personal data in accordance with:

- Regulation (EU) 2016/679 (GDPR)
- Applicable Dutch data protection legislation
- Applicable Irish data protection legislation where relevant

As a regulated insurance intermediary, we are required to maintain records and may be required to disclose information to the AFM, the Central Bank of Ireland or other competent authorities.

3. Personal Data We Collect

When you request a quotation or purchase travel insurance, we collect personal data necessary to assess eligibility, provide a quote and arrange cover.

This includes identity and contact information such as your name, date of birth, address, email address and telephone number.

We collect travel information including destination, dates of travel, number of travellers and trip details.

We collect medical information where relevant to underwriting. This may include information about existing or past medical conditions, treatment history, medication, diagnostic tests or referrals. This information is classified as special category data under GDPR.

If you make a claim, we collect claims information including details of the incident, medical reports, supporting documentation and communications.

We collect payment information such as billing address and transaction details. Card payments are processed by regulated payment providers. We do not store full card numbers.

We collect communications data including emails, digital interactions and call recordings where applicable.

We also collect technical and usage data through our website, including IP address, device information and digital journey interactions.

Where you begin your journey on a price comparison website, certain personal data is initially collected by that website in accordance with its own privacy policy. If you proceed to purchase, relevant information is securely transferred to us so that we can arrange your policy. We are responsible for the personal data we receive and process from that point onwards.

4. How We Use Your Personal Data

We use your personal data to provide quotations and arrange travel insurance policies.

We use medical information to assess underwriting risk and determine appropriate cover terms or pricing.

We use personal data to issue policy documentation, administer policies and handle mid-term adjustments where applicable.

We use your personal data to assess and process claims arising under your travel insurance policy. Claims handling is carried out by a specialist claims administration provider acting on our behalf.

We use personal data to comply with legal and regulatory obligations, including statutory record-keeping requirements and regulatory reporting.

We use personal data to prevent fraud and financial crime.

We use technical data to monitor and improve our digital processes and customer experience.

In accordance with the Consumer Protection Code 2025, we are required to act honestly, fairly and professionally in your best interests. Our use of personal data is aligned with this obligation.

5. Lawful Bases for Processing

Under the GDPR, we rely on the following lawful bases.

Processing is necessary for the performance of a contract when providing a quotation or arranging a travel insurance policy.

Processing is necessary for compliance with legal obligations where we are required to retain records or provide information to regulators or authorities.

Processing may be based on our legitimate interests in operating and improving our digital insurance services, provided those interests do not override your rights.

Where we process medical information and other special category data, we rely on your explicit consent or another lawful basis permitted under Article 9 GDPR, such as processing necessary for the establishment, exercise or defence of legal claims.

You may withdraw consent at any time. However, if you withdraw consent for the processing of medical information necessary for underwriting, we may not be able to provide or continue insurance cover.

6. Automated Decision-Making and Medical Screening

We use automated systems in underwriting, pricing and eligibility assessment.

Medical screening responses may be processed using automated decision-making tools to assess risk and determine quotation outcomes.

Where a decision is made solely by automated means and produces legal or similarly significant effects, you have the right to request human intervention, express your point of view and contest the decision.

We monitor automated systems to ensure accuracy, fairness and compliance with GDPR and Consumer Protection Code 2025 requirements.

7. Sharing Your Personal Data

We will share personal data with insurers underwriting your policy.

Claims under your policy are administered by a specialist third-party claims administrators acting on our behalf. In order to assess and manage claims, we will share relevant personal data, including special category medical information where necessary, with this provider.

Our claims administrators processes personal data under contractual arrangements that require compliance with GDPR and appropriate security and confidentiality standards.

We may also share claims-related information with healthcare providers, emergency assistance providers and fraud prevention agencies where necessary for the establishment, exercise or defence of legal claims.

We remain responsible for ensuring that appropriate oversight and safeguards apply to outsourced claims processing.

8. International Transfers

Where personal data is transferred outside the European Economic Area, we ensure appropriate safeguards are in place, including adequacy decisions or Standard Contractual Clauses.

9. Data Retention

We retain travel insurance records for a minimum of ten years after the end of the customer relationship, or longer where required by law or necessary to establish, exercise or defend legal claims.

Medical information is retained only for as long as necessary for underwriting, claims handling and regulatory compliance.

Retention periods are reviewed periodically to ensure they remain appropriate and lawful.

10. Your Rights

Under the GDPR, you have the right to:

- access your personal data.
- request correction of inaccurate data.
- request erasure in certain circumstances.
- restrict processing.
- object to processing based on legitimate interests.
- data portability where applicable.

Where processing is based on consent, you have the right to withdraw consent at any time.

Our lead supervisory authority is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Irish consumers may also contact the Data Protection Commission:

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland
Website: www.dataprotection.ie

12. Data Security

We implement appropriate technical and organisational measures to protect personal data, including encryption, restricted access controls and secure hosting environments.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect legal, regulatory or operational changes. The most recent version will always be available on our website.