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Sent: Monday 1 March 2021 07:37

To: Childrens Consultation <childrensconsultation@dataprotection.ie>

Subject: Fundamentals for a Child-Oriented Approach to Data Processing_Draft Version for Consultation

Good morning sir or madam,

After carefully reading the recently released Fundamentals for a Child Oriented Approach to Data Processing Guidance, and taking into account that all interested parties are invited to respond to this document by making submissions/ providing their observations and comments on this document to the DPC by **31 March 2021**, some queries have arisen from my side.

I have missed, in an overall, some guidance or practical view from the Insurance Sector. This Sector sometimes process personal information of children not in an intentional manner, but as a consequence of the processing of adults' information in i. e. a claim. This means that processing personal data of children is not the aim or main business of any Insurer, but it may occur in some situations. And this is why the Insurance Sector would really appreciate if the new Guidance could be broader in the sense of mentioning something related to occasional processing of children's data and also with regard to running Insurance Link database on minors.

Regards,

[REDACTED]
[REDACTED]
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