



Society of Actuaries in Ireland

Review of the Insurance Ireland Code of Practice for Underwriting Mortgage Protection Insurance for Cancer Survivors

Prepared by the Right to be Forgotten Working Group

July 2025

Preface

The Society of Actuaries in Ireland (“SAI”) is the professional body representing the actuarial profession in Ireland. Members of the SAI who work in the insurance area have a deep understanding of the life insurance market in Ireland, including regulation, taxation, and market practice. The SAI’s Mission includes the following:

[To] Serve the public interest by promoting thought leadership and contributing as an independent voice on matters where an actuarial perspective can add value.

In this context, the SAI is pleased to present this report.

Executive Summary

On the 3rd April 2023 the Society of Actuaries in Ireland Right To Be Forgotten (“RTBF”) Working Group published our report:

Consideration of the potential impacts of the introduction of a Right to be Forgotten Framework for Cancer Survivors in Ireland when applying for Life Insurance Products (the “SAI RTBF Report”)¹

The key point raised in the SAI RTBF Report was that different groups of consumers will be impacted in different ways by a Right to be Forgotten Framework for Cancer Survivors.

Following the publication of the SAI RTBF Report, Insurance Ireland published their “Code of Practice for Underwriting Mortgage Protection Insurance for Cancer Survivors” (“the Code of Practice”)². This Code of Practice took effect in December 2023 so has been in place for over 1 year.

The purpose of this update is to:

1. Compare the features of the Code of Practice against the frameworks introduced in other European countries.
2. Use the data that was collected in compiling the SAI RTBF Report to estimate the potential impacts of the Code of Practice over the longer term, as well as better understand the number of cancer survivors that might be impacted by changing the parameters of the Code of Practice.

Comparison of the Code of Practice to approaches in other European Countries

The Code of Practice is similar to what has been introduced in other countries in that:

1. It applies to Mortgage Protection insurance, although, we noted that some countries also include Business Loans (e.g. France) and others have extended the scope to include income insurance products (e.g. Belgium).
2. Most countries have implemented a RTBF for cancer survivors only, as is the case in Ireland, though some countries have now extended to include Hepatitis C (e.g. France, Belgium, Luxembourg and Slovenia) and HIV (e.g. Belgium, Luxembourg and Slovenia)

¹ [Paper - Right to be Forgotten framework for Cancer Survivors | Society of Actuaries in Ireland](#)

² [Insurance Ireland Code of Practice for Underwriting Mortgage Protection Insurance for Cancer Survivors - Insurance Ireland](#)

The Code of Practice applies where cancer treatment has ended 7 or more years ago. This is consistent with what is applied in Slovenia and Romania and compares favourably to Luxembourg, The Netherlands, Portugal, Italy, Cyprus and Greece, where a 10-year period is applied. Both France and Belgium have reduced the time period to 5 years having initially applied a 10-year period and Spain also intends to apply a period of 5 years.

A 5-year recovery period for cancers diagnosed in childhood is applied consistently across Europe, as is the case in the Code of Practice. Some countries apply this up to age 21 rather than age 18 (Belgium, The Netherlands, Portugal, Italy, Slovenia and Cyprus).

The Code of Practice is consistent with the approach introduced in Italy, Greece, Cyprus and Czechia, where it is expected that the cancer survivor should make a full declaration of their past cancer, and the onus is on the insurer to determine whether the information should be used or disregarded. In other markets (France, Belgium, Luxembourg, The Netherlands, Portugal, Spain (once implemented), Slovenia and Romania), the applicant does not need to disclose their previous cancer diagnosis or treatment to the insurer once the requirement for the period since treatment has ended has been met. As such the approach adopted under the Code of Practice could be deemed a 'Requirement to Disregard' framework rather than a 'Right to be Forgotten' approach.

A full comparison of the features of the Code of Practice to what has been introduced in other European Countries is included in Section 1.2 of this report.

Estimate the potential impacts of the Code of Practice over the longer term, as well as better understand the number of cancer survivors that might be impacted by changing the parameters of the Code of Practice.

For the original report, the SAI Right to be Forgotten Working Group analysed data for a cohort of life insurance applications over an 8-year period. Among the applications from cancer survivors for decreasing mortgage protection with a sum assured of less than €500,000, an estimated 47% were from individuals whose treatment had ended more than 7 years prior. We estimate that 435 cancer survivors per year would have been eligible for their cancer diagnosis to be disregarded over the 8.3-year span of our dataset.

However, as noted in the SAI RTBF Report, being eligible to be considered under an RTBF framework may not necessarily lead to a change in actual outcome for these individuals as some cancer survivors already get accepted at standard terms depending on the type and severity of the cancer they had and the duration since treatment ended.

During the 8.3 year period³ of our dataset, 90% of applications for decreasing mortgage protection from cancer survivors met the sum assured threshold set out in the Code of Practice i.e. were for a sum assured of €500,000 or less. We note that house price inflation in more recent years may potentially mean that this parameter has a more material impact than observed in the historic data.

Our analysis has focused on decreasing mortgage protection (in line with the Code of Practice). Should a RTBF framework be extended to other products, in particular Specified Illness Cover and Income Protection, then further analysis would be required as we would anticipate the impacts to be more significant.

³ Analysis of anonymised disclosure data from the period 28th August 2014 to 31st December 2022

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Background

On the 3rd April 2023 the Society of Actuaries in Ireland Right To Be Forgotten (“RTBF”) Working Group published our report:

*Consideration of the potential impacts of the introduction of a Right to be Forgotten Framework for Cancer Survivors in Ireland when applying for Life Insurance Products (the “SAI RTBF Report”)*⁴

The key point raised in the SAI RTBF Report was that different groups of consumers will be impacted in different ways by a Right to be Forgotten Framework for Cancer Survivors.

Implementing a RTBF framework for cancer survivors may directly benefit them but it will affect various consumer groups differently when they apply for life insurance products. The SAI RTBF Report showed that some cancer survivors currently get accepted for life insurance, so for this cohort of cancer survivors, the actual outcomes may not change on foot of a RTBF framework, as they are already being offered cover. However, cancer survivors do typically face a longer application process which will be improved for some through the introduction of an RTBF framework. Importantly, it may help to change perceptions of accessibility of life insurance, leading to more cancer survivors ultimately applying for cover.

The report states that life insurance products will likely become more affordable for some cancer survivors. This could be expected to lead to an increase in the number of cancer survivors buying life insurance products. Other consumers who have never been diagnosed with cancer are likely to see an increase in premiums if an RTBF framework is introduced (i.e. cross-subsidising for consumers who meet the RTBF criteria). Some consumers may consider this to be unfair and this could potentially lead to a reduction in the overall number of consumers purchasing life insurance products. Consumers who have recovered from other illnesses or diseases may feel unfairly treated as they would still be required to disclose their prior condition(s).

The SAI RTBF Report, based on data obtained over an 8.3-year period, showed that an estimated 17,000 cancer survivors applied for life insurance (1.7% of circa 995,000 applications for life insurance in Ireland over the period).

Following the publication of the SAI RTBF Report in April 2023, Insurance Ireland published their “Code of Practice for Underwriting Mortgage Protection Insurance for Cancer Survivors” (“the Code of Practice”)⁵. This Code of Practice took effect in December 2023 and has been in place for over a year.

The purpose of this update is to:

1. Compare the features of the Code of Practice against the frameworks introduced in other European countries.
2. Use the data that was collected in compiling the SAI RTBF Report to estimate the potential impacts of the Code of Practice over the longer term, as well as better understand the number of cancer survivors that might be impacted by changing the parameters of the Code of Practice.

⁴ [Paper - Right to be Forgotten framework for Cancer Survivors | Society of Actuaries in Ireland](#)

⁵ [Insurance Ireland Code of Practice for Underwriting Mortgage Protection Insurance for Cancer Survivors - Insurance Ireland](#)

1. About the Insurance Ireland Code of Practice

The Insurance Ireland Code of Practice was announced on the 3rd April 2023⁶ with full text published on the 7th June 2023 and came into effect on the 6th December 2023⁷.

1.1 What does the Code of Practice cover?

The Code of Practice means that insurers (who have signed up) will disregard a disclosed cancer diagnosis where treatment ended more than 7 years prior to the date of their application or more than 5 years if the applicant was under 18 at the time of diagnosis.

The Code of Practice applies to decreasing mortgage protection policies only with a sum assured of up to and including €500,000 in connection with a mortgage on a principal private residence.

1.2 How does the Code of Practice compare to approaches in other European countries?

This table summarises a comparison of the Code of Practice to RTBF frameworks introduced or in progress in other European countries. A detailed comparison table by country is included in Appendix 1 to this report. We have largely relied on a record maintained by the Ending Discrimination against Cancer Survivors Group for this information⁸.

Aspect considered	Comment(s)
Products covered	Like in Ireland, most of the RTBF frameworks introduced in other European countries focus on mortgage protection insurance. Though some countries also include business loans (e.g. France) and others have extended the scope to include income insurance products (e.g. Belgium). In 2025 Belgium extended their framework to include travel insurance products.
Period since treatment ended (Adult Cancers)	For adult cancer survivors, the Code of Practice's parameter of 7 years since treatment ended is more progressive than in some other countries in Europe – with some countries applying a 10-year period (Luxembourg, The Netherlands, Portugal, Italy, Cyprus and Greece). Notably, France initially introduced a 10-year period in 2016, which in 2022 was reduced to 5 years. Similarly, Belgium reduced their period from 10 years to 8 years in 2022 and then to 5 years in 2025. In November 2024 Slovenia introduced a 7-year approach consistent with Ireland.
Period since treatment ended (Childhood Cancers)	For childhood cancer survivors (i.e. where the applicant was under 18 at time of diagnosis) the Code of Practice's parameter of 5 years since

⁶ [Insurance Ireland Life Members to Introduce New Code of Practice for Cancer Survivors Seeking Mortgage Protection Insurance - Insurance Ireland](#)

⁷ [New Insurance Ireland Code of Practice for Underwriting Mortgage Protection Insurance for Cancer Survivors to take Effect from 6th December 2023 - Insurance Ireland](#)

⁸ [OVERVIEW OF LEGISLATION AT THE NATIONAL LEVEL - Ending Discrimination against Cancer Survivors](#)

	treatment ended is consistent with what has been implemented in other countries (France, Belgium, Luxembourg, The Netherlands, Portugal, Italy, Slovenia, Romania and Greece). Some countries apply this up to age 21 rather than 18 (Belgium, The Netherlands, Portugal, Italy, Slovenia and Cyprus).
Conditions Covered	Most countries have implemented a RTBF framework for cancer survivors only, as is the case in Ireland, though some countries have now extended theirs to include Hepatitis C (France, Belgium, Luxembourg and Slovenia) and HIV (Belgium, Luxembourg and Slovenia).
Sum Assured restrictions	Like Ireland, France, Luxembourg, The Netherlands, Cyprus and Greece apply a max sum assured within their framework. For France this is €420,000 (lower than the Code of Practice's equivalent of €500,000), Luxembourg applies a €1m limit, in The Netherlands it is €280,000 and Cyprus and Greece apply a €300,000 sum assured limit. Other countries do not appear to apply any sum assured limit.
Age Restrictions	The Code of Practice does not apply any age limit restrictions. In Netherlands a max age of 71 applies.
Principal Private Resident Requirement	The Code of Practice only applies to decreasing mortgage protection for a principal private residence. Similarly, Luxembourg also does not apply their framework to second homes or rental investments. Other countries do not appear to apply this restriction.
Disregard vs Right to be Forgotten	<p>The Code of Practice is consistent with the approach introduced in Italy, Greece, Cyprus and Czechia, where it is expected that the cancer survivor should make a full declaration of their past cancer, and the onus is on the insurer to determine whether the information should be used or disregarded.</p> <p>In other markets (France, Luxembourg, The Netherlands, Portugal, Slovenia and Romania), the applicant does not need to disclose their previous cancer diagnosis or treatment to the insurer once the requirement for the period since treatment has ended has been met.</p> <p>As such the approach adopted by the Code of Practice in Ireland could be considered a 'Requirement to Disregard' framework rather than a 'Right to be Forgotten' approach.</p> <p>There are advantages to this approach. In particular, it:</p> <ul style="list-style-type: none"> - Gives cancer survivors greater claim certainty as responsibility sits with the insurer to use the information where appropriate and disregard where appropriate.

	<ul style="list-style-type: none"> - Gives insurers greater certainty of the risks they are taking on, which potentially benefits consumers by limiting the impact of any pricing changes needed. <p>However, in the spirit of what RTBF is trying to achieve it might still be considered unfair on cancer survivors to require them to disclose their previous cancer history.</p>
Legislation or industry code of practice	Ireland along with Luxembourg, Greece and Czechia have implemented their RTBF framework through an industry code. Other countries have taken a legislative approach to implementation.
Supplementary reference grid of time periods for certain Cancers	<p>The Code of Practice implements a single 7-year period for all adult cancers. However, this is not to say that Irish insurers do not accept individuals who have recovered from specific cancers sooner. In Section 4 of the SAI RTBF Report, a number of Irish insurers surveyed indicated that they would accept lives who have recovered from low grade early-stage Breast, Prostate, Colorectal, Lung and Melanoma Skin Cancer at 5 years post completion of treatment.</p> <p>A number of other countries (France, Belgium, Luxembourg, The Netherlands, Portugal and Italy) have implemented this requirement explicitly by introducing a reference grid for specific cancers with shorter waiting periods.</p>

Table 1: Comparison of the Insurance Ireland Code of Practice to RTBF frameworks introduced in other countries

1.3 Who has signed up to the Code of Practice?

According to Insurance Ireland they devised the Code of Practice with both members and non-members. Current signatories (June 2025) to the Code of Practice are:

- Acorn Life
- AIB Life
- Aviva Life & Pensions
- Irish Life
- Laya Healthcare
- New Ireland Assurance
- Royal London Ireland
- Zurich Life Assurance plc.

2. Estimating the potential impact of the Code of Practice

Working with an underwriting technology provider and three Irish insurers who use the technology from that provider, we have been able to analyse anonymised disclosure data from the period 28th August 2014 to 31st December 2022.

This data set included 665,817 individual applications, of which 11,314 included a disclosure of some type of cancer. The insurers participating in this analysis have an estimated life insurance market share of 50% in 2022⁹ so we believe this is a representative data set for the life insurance market in Ireland overall.

We were able to further analyse the data set to focus solely on decreasing mortgage protection policies only, and then apply the sum assured limit of €500,000¹⁰. This resulted in 233,559 applications, of which 3,856 included a cancer disclosure. The implied percentage of applications with a cancer disclosure of 1.7% is consistent with that observed in the total dataset.

	Number of applications	Number of applications with a cancer disclosure	% of applications with a cancer disclosure
Total Dataset	665,817	11,314	1.7%
Life Insurance applications only	509,713	9,347	1.8%
Decreasing Mortgage Protection policies only	254,628	4,305	1.7%
Decreasing Mortgage Protection policies only where Sum Assured < €500,000	233,559	3,856	1.7%

Table 2: Impact on number of applications of product and sum assured restrictions

2.1 Impact of the decreasing mortgage protection only requirement

Our data shows that there were 4,305 applications from cancer survivors for decreasing mortgage protection within the 8.3-year period of our dataset.

This represents 46% of Life Insurance applications (4,305 out of 9,347) from cancer survivors during this period.

Given that this is historical data, it is possible that some cancer survivors who previously applied for other types of life insurance may now apply for decreasing mortgage protection policies to benefit from the Code of Practice.

Other products

The focus of our analysis in this report is on decreasing mortgage protection products in line with the Code of Practice. In the original SAI RTBF Report we focused on life cover products in general. However, as we noted in the original report the implications may be more material for other products such as Serious Illness or Income Protection. Further analysis would be warranted should a RTBF framework be extended beyond life cover products.

⁹ Source: Milliman Ireland market share monitor – share of protection product sales only (i.e., Life insurance, Serious Illness, and Income Protection) for 2022

¹⁰ Note that the dataset considers sums assured of less than €500,000 rather than up to and including €500,000. The dataset does not make allowance for the principal private residence requirement

2.2 Impact of the maximum sum assured of €500,000 requirement

This analysis shows that 90% of decreasing mortgage protection applications from cancer survivors (3,856 out of 4,305) meet the less than €500,000 sum assured requirement. However, this total is based on the 8.3-year period of our historic dataset up to the 31st December 2022. Inflationary impacts (in particular house price inflation) in more recent years may have a material impact on the actual number of cancer survivors impacted by this requirement going forward.

2.3 Estimating the total number of cancer survivors who may benefit from the Code of Practice after the product and sum assured requirements

Our data shows that 3,856 applications within the 8.3-year period of our dataset would meet the product and sum assured criteria of the Code of Practice (i.e. before any period since treatment criteria has been applied). Extrapolating to the whole market (assuming our dataset represents 50% of the market) then we estimate that c. 7,700 cancer survivors who applied for life cover over this 8.3-year period would have met the product and sum assured criteria of the Code of Practice. This equates to c. 925 cancer survivors per year applying for cover.

2.4 Impact of the 7-years since treatment ended requirement

For the cohort of the applications in our data set that had disclosed a previous cancer diagnosis we have further broken down the disclosure rates by the number of years since treatment ended.

Note we do not have data for all applicants on whether treatment has ended, and as a result, the time period since treatment ended. As such, we only have full recovery data for c. 24% of all cancer disclosures which equates to roughly 2,707 applications. It is therefore a relatively small dataset but the distribution of disclosures by years since treatment ended has also been compared versus similar UK data and it is noted that the distribution is relatively consistent.

	Total Dataset	Decreasing Mortgage Protection only with sum assured < €500k
All Cancer Disclosures with a time period	2,707	903
Time period since treatment ended greater than 7 years	1,392 (51%)	426 (47%)
Time period since treatment ended greater than 6 years	1,595 (59%)	499 (55%)
Time period since treatment ended greater than 5 years	1,756 (65%)	556 (62%)

Table 3: Time period since treatment ended.

This implies that for c.51% of cancer survivors who applied for life insurance during this 8.3-year period, treatment had ended 7 or more years prior to their application in the whole dataset. For decreasing mortgage protection only with sums assured of less than €500,000, this figure is 47%. Therefore, these applicants meet the recovery period requirement of the Code of Practice.

Combining this insight with the product and sum assured information, we estimate that 435 cancer survivors per year over this 8.3-year period would have been eligible for consideration under the Code of Practice had it been in place in the past. This figure is derived from the estimated 925 cancer survivors per year who meet the product and sum assured requirements of the Code of Practice (as outlined in section 2.3 above) adjusted by 47% for the 7-year treatment completion requirement.

If the time period were to be reduced to 6 years then we estimate that an additional 74 cancer survivors per year would be eligible to have their cancer history disregarded under the Code of Practice, and if the time period was further reduced to 5 years then a further 65 cancer survivors per year would meet the requirements of the Code of Practice (i.e. 574 in total per year). However, including these additional lives may potentially have a bigger impact on premiums for other consumers, as, in general, the risk of cancer recurrence is higher the shorter the period since treatment ended.

However, as noted in the SAI RTBF Report, it is reasonable to assume that if the Code of Practice is successful in changing the perception of cancer survivors, and their advisers, more cancer survivors will apply for decreasing mortgage protection cover now that the Code of Practice is in place than in the past. So, the future numbers is expected to be greater than that observed in the past, all other factors being equal. We look forward to seeing actual numbers and case studies once the Code of Practice has been in place for a longer period.

2.5 Impact of the Principal Primary Residence Requirement

The data collected did not include information on whether the decreasing mortgage protection cover being applied for related to cover on a Principal Primary Residence, so we are not able to estimate the impact of this requirement. In our calculations above, it is assumed that all decreasing mortgage protection policies were in respect of cover on a principal primary residence.

2.6 Conclusions

Based on the data analysed, of the applications from cancer survivors, an estimated 47% of applications for decreasing mortgage protection with a sum assured of less than €500,000 were from cancer survivors whose treatment ended more than 7 years prior. We estimate that 435 cancer survivors per year would have been eligible for consideration for their cancer diagnosis to be disregarded over the 8.3-year span of our dataset. An estimated 53% of applications would not meet the requirements of the Code of Practice as their cancer treatment has not yet ended or the period since treatment ended is less than 7 years. These applications would be underwritten as normal and as our original report outlined, they may still be offered cover depending on the type and severity of their cancer and the time elapsed since their treatment concluded.

As highlighted in the SAI RTBF Report, eligibility for consideration under an RTBF framework as part of a decreasing mortgage protection application may not necessarily alter the actual outcome for these individuals, given some cancer survivors are already accepted under standard terms, depending on the type and severity of their cancer and the time elapsed since their treatment concluded.

During the 8.3-year period of the dataset, 90% of applications for decreasing mortgage protection life cover from cancer survivors were for a sum assured of €500,000 or less,. However, though we noted that house price inflation in more recent years may potentially mean that this parameter has a more material impact now and in future than observed in the historic data.

Acknowledgements

We are grateful for the information, views and ideas contributed by the large number of people and organisations, who helped us with our research.

About the working group

This working group was established by the Life Committee of the SAI. Thank you to members of this working group which was made up of members of the SAI plus some Medical Underwriting and Claims Assessors active in the Irish Market who acted as Subject Matter Experts to contribute to the work of the group. Members were recruited through an open call to all members of the SAI and their colleagues with Underwriting and Claims expertise. The members of the working group were:

<i>Ciara Russell</i>	<i>James Sims</i>
<i>Cillian Tierney</i>	<i>Jean Larkin</i>
<i>Davy Hughes</i>	<i>Julie McCarthy (co-chair)</i>
<i>Gavin Maguire (co-chair)</i>	<i>Lorna O'Regan</i>
<i>Gerry Tierney</i>	<i>Michael Shelley</i>
<i>Gillian O'Keeffe</i>	<i>Rachael Winters</i>

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Disclaimer

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APPENDIX 1: Comparison of Insurance Ireland Code of Practice to RTBF Frameworks in other European Countries¹¹

Country	Ireland	France	Belgium	Luxembourg	The Netherlands	Portugal	Italy
Year Introduced	2023	2016	2019 (came into effect in Feb 2020)	2020	2021	2022	2023 (came into effect in Jan 2024). The law has not been fully implemented yet, as some of the foreseen implementation acts are still being worked through.
Products Covered	Decreasing Term Assurance linked to Mortgage Protection on Principle Primary residence.	Mortgage Protection and cover for business loans. Applicable to decreasing term, loan insurance whatever the outstanding capital but limited to 70 years old included at the end of the contract. Applicable to life insurance, total and permanent disability and Short-term disability.	Originally Mortgage Protection Insurance, though since extended to include Income Insurance in 2022 and travel insurance in 2025.	Mortgage Protection Insurance	Life Insurance & Funeral Insurance	Housing credit and consumer credit, and compulsory or voluntary insurance associated with such credit.	Applies to bank services, financial services and insurance services.
Period since treatment ended (adult cancers)	7 years	5 years (reduced from 10 years in 2022)	5 years (reduced from 10 to 8 years in 2022, and from 8 years to 5 years w.e.f. 1 Jan 2025)	10 years	10 years	10 years	10 years
Period since treatment ended (childhood cancers)	5 years	5 Years	5 years	5 years	5 years	5 years	5 years
Childhood cancer age limit	18	N/A	21	18	21	21	21
Conditions covered	Cancer Only	Cancer + Hepatitis C (added in 2022)	Cancer + Hepatitis C + HIV infections	10 specific types of cancer, viral Hepatitis C and HIV	Cancer Only	Cancer or 'mitigated chronic diseases'	Cancer
Sum Assured Restrictions	€ 500,000	Insurance cannot exceed €420,000 for a real estate loan	None	€1m EURO	Mortgage amount cannot exceed €280,000 (adjusted once every 3 years)	None	TBC
Age Restrictions	None	None	None	None	Life Assurance before age 71 and Funeral Insurance entered into before 61	None	None
Principle Private residence requirement	Yes	None	None	Does not apply to second home or rental investments.	None	None	None
Right to Forget or Requirement to Disregard	Requirement to Disregard	Right to Forget	Right to forget (wef January 2025)	Right to Forget	Right to Forget	Right to Forget	Requirement to disregard (applicant must obtain a certificate from Health professional saying they meet the requirements of the legislation for their cancer history to be disregarded).
Legislation or industry code	Industry Code	Legislation	Legislation	Code agreed between Ministry of Health and Industry	Legislation	Legislation	Legislation
Supplementary reference grid of time periods for certain Cancers	None	The French law also includes a reference grid, which foresees shorter duration for specific cancer types as long as loans remain under €420 000.	Lower numbers of years ranging from 0-3 years are applicable to certain types of cancer	This Convention includes a reference grid (Annex of the Convention) for specific cancer diseases corresponding to shorter terms for the application of the Right to be forgotten. In this regard, an obligation exists to declare the disease and the protection from being charged with extra premium.	A reference grid provides specific conditions for non-invasive cancers, foreseeing shorter waiting periods.	A reference grid provides a shortened timeline for specific types of cancers.	A reference grid provides a shortened timeline for specific types of cancers.

¹¹ Source: [OVERVIEW OF LEGISLATION AT THE NATIONAL LEVEL - Ending Discrimination against Cancer Survivors](#)

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Country	Ireland	Spain	Slovenia	Cyprus	Romania	Greece	Czechia
Year Introduced	2023	June 2023 (though legislation is yet to be implemented)	Nov-24	Nov-23	Jan-22	Mar-24	Nov-23
Products Covered	Decreasing Term Assurance linked to Mortgage Protection on Principle Primary residence.		Credit and insurance products	Applicable to loan and life insurance		Life insurance linked to loans	
Period since treatment ended (adult cancers)	7 years	5 years	7 years	10 years	7 years	10 years	Each insurance company must create it's own reference grid but the expected time period for most cancers is 7 years
Period since treatment ended (childhood cancers)	5 years	5 years	5 years	5 years	5 years	5 years	Expected time period for most cancers is 7 years
Childhood cancer age limit	18	N/A	21	21	18	18	
Conditions covered	Cancer Only	Cancer and HIV	Cancer, Hepatitis C and HIV	Cancer	Cancer	Cancer	Cancer
Sum Assured Restrictions	€ 500,000	None	TBC	€ 300,000	None	€ 300,000	None
Age Restrictions	None	None	TBC	None	None	None	None
Principle Private residence requirement	Yes	None	TBC	None	None	None	None
Right to Forget or Requirement to Disregard	Requirement to Disregard	Right to Forget	Right to Forget	Requirement to Disregard	Right to Forget	Requirement to Disregard	Requirement to Disregard
Legislation or industry code	Industry Code	Legislation	Legislation	Legislation	Legislation	Industry Code	Industry Code
Supplementary reference grid of time periods for certain Cancers	None	None	The law also establishes a special commission which will come up with a list that will be able to lower each general time rule based on the type and stage of each cancer.	None	The Ministry of Health established exemptions for shorter waiting periods by age categories and types of oncological diseases of the cancer survivors based on scientific data regarding therapeutic advances.	None	Each insurance company must create it's own reference grid but the expected time period for most cancers is 7 years