

## Customer Review Privacy Policy

Your privacy is very important to us. We promise to respect and protect your personal information and to make sure that your details are accurate and kept up to date. This Customer Review Privacy Policy sets out details of the information that we may collect about you and how we may use that information when you leave us a review after purchasing a car insurance policy. Please take your time to read this Customer Review Privacy Policy carefully, before leaving your review. When using our website, this Customer Review Privacy Policy should be read alongside the policy [Terms and Conditions](#) and the [Cookie Policy](#).

### 1. About Insure The Box ►

In this Customer Review Privacy Policy, references to "we" or "us" refer to Insure The Box Limited. Insurethebox is a trading style of Insure The Box Limited. We are part of the MS&AD Insurance Group of companies. You can find out more about the group at [www.ms-ad-hd.com/en](http://www.ms-ad-hd.com/en). We may share data within the group, but this is limited to our group companies within the European Economic Area (EEA).

In order for you to be able to write a customer review on our website, we will collect and use personal data about you. This means that we are a 'data controller' and we are responsible for complying with data protection laws. We have appointed a data protection officer to oversee our handling of personal information. If you would like more information about how we collect, store or use your personal information, see the "**8. Contact us ►**" section below.

### 2. What do we mean by personal information? ►

"Personal information" means information that relates to you as an individual, whether linked to your name or any other way which you could be identified. Please see below for the data we will collect about you. Some of this information is mandatory and you will not be able to write a customer review without providing it to us. You may choose to add other personal data to your customer review, such as your full name, your gender and your vehicle make.

Your information	Mandatory or optional	Public or Private
Product	Mandatory	Private (unless you choose to publish publicly)
Nickname*	Mandatory	Public
Age range	Optional	Public
Email address	Optional	Private
Vehicle details	Optional	Private
Location	Optional	Private
Your customer review	Mandatory	Public (on website)
Your star rating	Mandatory	Public (on website)
Securely encrypted password	Mandatory	Private
Cookies	Our Website uses cookies. Cookies identify your computer or device rather than you as an individual user, and are used for different purposes. Read more about which cookies the Website uses <a href="#">here</a>	

\*We advise that if you wish for your customer review to be anonymous on our website, that you use a username that does not identify you.

Certain types of personal information are considered to be "special categories of information" due to their more sensitive nature. We will not process special categories of data relating to customer reviews. Please do not share any special category data relating to you or anyone else with us, for this purpose.

**Special categories of information:** Information about your health, criminal convictions, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.

### 3. Our processing of your personal information ►

#### What will we use your personal information for?

We may process your personal information for a number of different purposes, and these purposes can overlap. We must have a legal ground for each purpose, and we will rely on the grounds as below.

Type of Processing	Grounds for using personal information	Grounds for special categories
To provide you with this service (to receive and display your customer review and set up/provide you access to your profile)	<ul style="list-style-type: none"><li>We have a genuine business need</li></ul>	We will not process your special categories of information for this purpose
To verify the legitimacy of your customer review (and to ask you to provide any information required to support your review)	<ul style="list-style-type: none"><li>We have a genuine business need</li></ul>	We will not process your special categories of information for this purpose
To manage and service queries and complaints (and to ask you to provide any information required to support this complaint or query)	<ul style="list-style-type: none"><li>We have a genuine business need</li><li>We have a legal or regulatory obligation</li></ul>	We will not process your special categories of information for this purpose
For trend analysis, audits, analysis of customer experience, improving existing products & services (immediate & long term), developing new products and services	<ul style="list-style-type: none"><li>We have a genuine business need</li></ul>	We will not process your special categories of information for this purpose
To provide improved quality, training and security (to develop and improve our products and services)	<ul style="list-style-type: none"><li>We have a genuine business need</li><li>We have a legal or regulatory obligation</li></ul>	We will not process your special categories of information for this purpose
To prevent and investigate fraud	<ul style="list-style-type: none"><li>We have a genuine business need (to prevent and detect fraud)</li></ul>	We will not process your special categories of information for this purpose
To comply with our legal or regulatory obligations	<ul style="list-style-type: none"><li>We have a legal or regulatory obligation</li></ul>	We will not process your special categories of information for this purpose

Where we state that we have a genuine business need to use your personal information under the General Data Protection Regulation (GDPR) 'legitimate interests' lawful basis, we will always consider your rights and interests.

#### Who will we share your personal information with?

Once you have submitted your customer review, it will be published on the website. This means that the data listed in section "2. What do we mean by personal data?" will be public.

We may share personal information within the MS&AD Insurance Group or with the following third parties for the purposes laid out in the table above:

- Third party suppliers, vendors, consultants and service providers we appoint to help us carry out our everyday business activities on our behalf;
- Professional regulators, the police or other public or government authorities, in order to comply with laws or respond to legal processes;
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Third parties in order to investigate, prevent or take action regarding suspected or actual prohibited activity, including fraud and misuse of our website
- Third parties in order for us to pursue available remedies, or limit damages that we may sustain.

### 4. What is our approach to sending your personal information abroad? ►

Sometimes we (or third parties acting on our behalf) will transfer personal information that we collect about you to countries outside of the European Economic Area ("EEA").

Where a transfer occurs we will take steps to ensure that your personal information is protected. We will do this using a number of different methods including:

- putting in place appropriate contracts. We will use a set of contract wording known as the "standard contractual clauses" which has been approved by the data protection authorities
- transferring personal data only to those companies in the United States who are certified under the "Privacy Shield". The Privacy Shield is a scheme under which companies certify that they provide an adequate level of data protection. You can find out more about the Privacy Shield at: <https://www.privacyshield.gov/Individuals-in-Europe>.

### 5. How long do we keep your personal information for? ►

We will keep your personal information for as long as reasonably necessary to fulfil the purposes set out in section 3 above and to comply with our legal and regulatory obligations.

Your data	Public or Private
Mandatory personal data	3 years
Optional	3 years

We keep both Mandatory and Optional data, including your review, for up to 3 years from when you submit your review. We will delete the review upon your request. If you wish to delete your review, you can do so easily by contacting us using the information below.

## 6. Your rights ►

Under data protection law you have a number of rights in relation to the personal information that we hold about you. You can exercise these rights by contacting us. We will not usually charge you in relation to a request.

<b>The right to access your personal information ►</b>	You are entitled to a copy of the personal information we hold about you and certain details of how we use it. We will usually provide your personal information to you in writing unless you request otherwise. Where your request has been made electronically (e.g. by email), a copy of your personal information will be provided to you by electronic means where possible.
<b>The right to rectification ►</b>	We take reasonable steps to ensure that the information we hold about you is accurate and where necessary up to date and complete. If you believe that there are any inaccuracies, discrepancies or gaps in the information we hold about you, you can contact us and ask us to update or amend it.
<b>The right to erasure ►</b>	This is sometimes known as the 'right to be forgotten'. It entitles you, in certain circumstances, to request deletion of your personal information. For example, where we no longer need your personal information for the original purpose we collected it for or where you have exercised your right to withdrawn consent. Whilst we will assess every request, there are other factors that will need to be taken into consideration. For example we may be unable to erase your information as you have requested because we have a regulatory obligation to keep it.
<b>The right to restriction of processing ►</b>	In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to use your personal information.
<b>The right to data portability ►</b>	In certain circumstances, you can request that we transfer personal information that you have provided to us to a third party.
<b>The right to object to marketing ►</b>	You have control over the extent to which we market to you and you have the right to request that we stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email that we send to you or by contacting us using the details set out in section 10. Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.
<b>The right to object to processing ►</b>	In addition to the right to object to marketing, in certain circumstances you will also have the right to object to us processing your personal information. This will be when we are relying on there being a genuine business need to process your personal information. Please note, in some circumstances we will not be able to cease processing your information, but we will let you know if this is the case.
<b>Rights relating to automated decisions ►</b>	You will not be subject to any automated decisions for this purpose
<b>The right to withdraw consent ►</b>	Where we rely on your consent in order to process your personal information, you have the right to withdraw such consent to further use of your personal information. Please note that for some purposes, we need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy or we may be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent
<b>The right to lodge a complaint with the ICO ►</b>	You have a right to complain to the Information Commissioner's Office if you believe that any use of your personal information by us is in breach of applicable data protection laws and / or regulations. More information can be found on the Information Commissioner's Office website: <a href="http://www.ico.org.uk">www.ico.org.uk</a> . This will not affect any other legal rights or remedies that you have.

Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request such as where complying with it would mean that we couldn't comply with our own legal or regulatory requirements. In these instances we will let you know why we cannot comply with your request.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued. For example, if you request erasure of your personal information, we would not have the information required to pay your claim. We will inform you of this at the time you make a request.

## 7. How we protect your information ►

The protection of your personal data is important to us. We take a number of technical and procedural measures to protect personal data. For example:

- Where we capture your personal information through our website, we will do this over a secure link using recognised industry standard technology (SSL) which encrypts data that is transmitted over the internet. Most browsers will indicate this by displaying a padlock symbol on the screen

- We prevent unauthorised electronic access to servers by use of suitable firewalls and network security measures. We use strong internal antivirus and malware monitoring tools and conduct regular vulnerability scans to protect our internal infrastructure and also to protect communications we may send you electronically. Our servers are located in secure datacentres that are operated to recognised industry standard. Only authorised people are allowed entry and this is only in certain situations
- We ensure that only authorised persons within our business have access to your data and conduct regular checks to validate that only the correct people have access. We promote responsible access to data and segregate who can see what data within the organisation
- Internally in our organisation, we have password policies in place which ensure passwords are strong and complex and are changed regularly
- We use secure email exchange where necessary for sensitive data and have monitoring on all email we send and receive
- We schedule periodic checks of all security measures to ensure they continue to be efficient and effective, taking into account technological developments.

## 8. Contact us ►

If you have a query relating to our products or services, please visit the website and contact the appropriate department [here](#).

You may contact our Data Protection Officer if you would like to exercise the GDPR rights set out above in section “6. Your Rights”, or if you have any questions about how we collect, store or use your personal information:

 The Data Protection Officer, Insure The Box Limited, PO Box 1308, Newcastle upon Tyne, NE12 2BF  
 [DPO@insurethebox.com](mailto:DPO@insurethebox.com)

## 9. Updates to this Privacy Policy ►

We may need to make changes to this Customer Review Privacy Policy periodically, for example, as a result of government regulation, new technologies, or other developments in data protection laws or privacy generally or where we identify new sources and uses of personal information (provided such use is compatible with the purposes for which the personal information was original collected). The Data Protection Officer will ensure that this document is updated regularly or as legislation requires.

This Customer Review Privacy Policy was last updated on **05/12/2019**