



ITB Driver App

Privacy Policy

Our ITB Driver App Privacy Policy

Your privacy is very important to us. We promise to respect and protect your personal information and try to make sure that your details are accurate and kept up to date. This Privacy Policy sets out details of the information about you that we may collect and process when you use the App, how we may use that information, who we may share it with and why. Please take your time to read this Privacy Policy carefully. This Privacy Policy should be read alongside the App Terms & Conditions, the [main insurethebox Privacy Policy](#) associated with your insurance product and the [website analytics and cookie policy](#).

1. About us ►

In this Privacy Policy references to "we" or "us" refer to Aioi Nissay Dowa Insurance UK Limited. *Insurethebox* is a trading style of Aioi Nissay Dowa Insurance UK 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. We will share data within the group, but this is limited to our group companies within the European Economic Area (EEA), except in exceptional circumstances where we may need to discuss a policy or claim with our parent companies.

In order to provide our services, we will collect and use data about individuals. 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, please see the "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, such as your insurance policy number.

Certain types of personal information are considered to be "special categories of information" due to their more sensitive nature. We do not process special categories of information for the purposes of using the ITB Driver App.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

3. Our processing of your personal information ►

(This section shows what personal information we collect about you and use if you download and use the ITB Driver App.)

What personal information will we collect and where will we collect it from?

We collect the following information provided by you:

- **Identity Data:** first name, last name, title, date of birth, vehicle registration number and claim reference number.
- **Contact Data:** email address, telephone numbers, address and postcode.
- **Profile Data:** username or similar identifier and password
- **Vehicle data:** vehicle registration number
- **Technical Data:** your login data, your device make and model as well as operating system and version type (IOS/Android), time zone setting and location, operating system and platform and other technology on the devices you use to access the ITB Driver App.
- **Driving Data:** any journey data, driving data and location data of individual journeys you track on the ITB Driver App. This includes: -
 - Acceleration and deceleration values (e.g. how much acceleration or braking is done)
 - Date and time (e.g. night driving)
 - Start and end of the trip
 - Vehicle position (GPS)
 - Interruptions of long journeys (e.g. regular breaks)
 - Insurance certificate number (for registration)

For more information about how your driving data is evaluated and scored, please refer to the app terms and conditions.

- **Usage Data:** includes information about how you use the ITB Driver App and other insurethebox products and services. Also includes device type, how long you use your ITB Driver App and how you use its features.
- **Marketing and Communications Data:** any data related to your marketing and communication preferences
- **Marketing analytics data:** We collect information when you register, to participate in interactive features (like customer satisfactions rating submission), completion of surveys, communicate via social media, viewing data like videos, usage data like number of times you login). Please see the "Marketing & Analytics" section below for more information.

What will we use your personal information for?

We may process your personal information for a number of different purposes. We must have a legal ground for each purpose, and we will rely on the following grounds for all App processing. For more specific Marketing processing, please see the "Marketing & Analytics" section below:

Type of Processing	Grounds for using personal information	Grounds for special categories
To communicate with customers to provide them with the ITB Driver App	<ul style="list-style-type: none">We have a Legitimate Interest to offer a similar service to the telematics box	We will not process your special categories of information for this purpose
To register you as a user of our ITB Driver App	<ul style="list-style-type: none">We have a Legitimate Interest to use the above personal data to register you as a user	We will not process your special categories of information for this purpose
To process your location, monitor and evaluate your driving practices and offer you a renewal price based on the use of the ITB Driver App and/or other related driving behaviour incentives	<ul style="list-style-type: none">Your explicit consent	We will not process your special categories of information for this purpose
To use the telematics data generated by the ITB Driver App to assist in a claim	<ul style="list-style-type: none">Your explicit consent	We will not process your special categories of information for this purpose
To deliver software updates and required app support	<ul style="list-style-type: none">We have a Legitimate Interest to keep the app up to date	We will not process your special categories of information for this purpose
To carry out relevant data analytics (including marketing analytics) to improve the ITB app/products/services, as well as marketing, customer relationships, customer satisfaction and experiences	<ul style="list-style-type: none">We have a Legitimate Interest to improve our services	We will not process your special categories of information for this purpose
To deliver relevant app content, to carry out necessary app administration activities such as data analyses, system and app testing, system and app maintenance, troubleshooting, technical support, reporting and data hosting	<ul style="list-style-type: none">We have a Legitimate Interest to maintain and improve the appWe have a legal or regulatory obligation	We will not process your special categories of information for this purpose
To communicate with you and resolve any complaints that you might have	<ul style="list-style-type: none">We have a Legitimate Interest to send you communications, record and handle complaints)	
To prevent and investigate fraud	<ul style="list-style-type: none">We have a Legitimate Interest to prevent and detect fraud	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">We have a legal or regulatory obligation	We will not process your special categories of information for this purpose

IMPORTANT: You may withdraw your consent at any time. Please note that without your consent we are unable to provide you with the service and you will not be able to use the ITB Driver App. Your insurethebox insurance policy will not be affected.

If you wish to withdraw consent for telematics data processing through the ITB Driver App, please email unsubscribeApp@insurethebox.com. We will stop processing new telematics data through the ITB Driver App within 5 working days of receipt of the email. The withdrawal of your consent will also trigger the GDPR right to erasure and we will delete all telematics data ever captured through the app within 30 days of the withdrawal of your consent.

Please note that if you delete the ITB Driver App, it will immediately stop us from collecting any further telematics data through this channel, but it will not signal to us that you withdraw consent for the processing of data captured during the period the App was installed. Therefore if you wish to withdraw consent, it is important to email us at unsubscribeApp@insurethebox.com.

If you would like more information, you can contact the Data Protection Officer at any time using the details provided in the 'Contact Us' section below.

Who will we share your personal information with?

Where necessary, we share personal information within the MS&AD Insurance Group (including but not limited to our ITB Driver App administration staff and providers, relevant call centre staff or any service staff involved in providing you with a quotation or managing your claims as per your insurance contract). We may also share your information with the following third parties for the purposes laid out in the table above:

- The policy applicant (where you are an individual named in a quote), or anyone authorised to act on your or their behalf
- Financial crime detection agencies and insurance industry financial crime databases (such as for fraud prevention and checking against international sanctions) including the Claims and Underwriting Exchange (known as "CUE"), and CIFAS
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or regulators (e.g. Financial Conduct Authority)
- Other third parties involved in the insurance application process (such as the price comparison website used, or other insurers)
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, subcontractors, and any outsourced service centre providers
- The police and other crime prevention and detection agencies

- Selected third parties in connection with any sale, transfer or disposal of our business.

Please refer to your main insurethebox insurance **Privacy Policy** for further information about how your personal information may be shared and who with.

Sharing of Telematics Data

Once you have downloaded the ITB Driver App and registered as a user we will begin to record your driving data. , The App will record and provide us with data about the driving style of the user of the app. It will collect a wide range of driving data such as date, time, location, speed, acceleration and braking. By assessing the data, it allows us to provide customers with advice on safer driving.

- We will share driving data only in the circumstances shown below, in accordance with the 'Grounds for Using Personal Data' outlined above:
- With third parties where we need to do so to manage the insurance policy or any claims (e.g. with our accident recovery partners if the car needs to be recovered following an accident)
 - Between departments within the company and/or Group. For example:
 - to help reduce fraud, by checking if another person is making a false claim against the driver; or the driver is making a false claim against someone else
 - to encourage safer driving; by examining how various groups drive and at what time of day the most incidents happen
 - to assist in calculating tailored renewal premiums for policyholders
 - to research and refine techniques for analysing App data, including looking at road safety issues such as analysis of certain roads to identify the risks they represent
 - Analytics suppliers use the data for research (e.g. to improve road safety). Any information that we share is made anonymous and does not contain any information that is classed as personal data under the data protection regulations. This means that none of the data can be linked to the policyholder.

We do not provide policyholders (or their representatives) with driving data for use in civil claims or criminal investigations and proceedings.

Sometimes the police and other regulatory bodies (such as HMRC or Department of Works & Pensions) may request that we send them information from about journeys made in the insured car. This is so they can investigate road traffic accidents, and also work to prevent, detect and investigate criminal and fraudulent activities. We will not normally release driving data or locational data unless the policyholder gives us permission to provide that information; we are required to do so by law (e.g. where the police obtain a Court Order for the information); or we suspect fraud or attempted fraud.

The telematics data obtained will relate to the mobile phone, not necessarily to the policyholder or their car.

What if you fail to provide us with your Personal Data?

Where we require your Personal Data (in order to provide you with the ITB Driver App and its associated services or where it is required by law), and you fail to provide us with this necessary Personal Data, we may not be able to provide you with these services as per our contract with you. Where this is the case, we may need to withdraw your access to the ITB Driver App and its associated services. We will communicate this directly with you.

How and when is telematics data used in a claim?

As described above, we will only use your telematics data in a claim with your explicit consent, as captured within the app. Your General Data Protection Regulation (GDPR) rights apply. You may withdraw this consent at any time. Your rights will not be affected and there will be no detriment to you. The withdrawal of consent shall not affect the lawfulness of any processing of your telematics data based on consent before its withdrawal, however it will mean that Aioi Nissay Dowa Insurance UK Limited must stop any further processing of this telematics app information from that point onwards.

If you would like more information about any of the above uses of your personal information, please see the "Contact us" section.

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
Identity Data	7 years
Contact Data	7 years
Profile Data	7 years
Driving Data	7 years

Technical Data	7 years
Usage Data	7 years

6. Security and storage ►

Whilst no data transmission via the internet can be guaranteed to be totally secure, we take steps to secure all information you provide to us and all data transport in and out of the device is fully encrypted. Any data we collect via the ITB Driver App will be stored in the UK and European Economic Area ("EEA"). Your data is stored locally on your ITB Driver App. You are able to delete this locally at any time. If you also wish for the ITB Driver App personal data to be deleted from our systems, you may contact us directly.

The information that you provide to us for the ITB Driver App is also stored in unencrypted form on your device. You must ensure that you password protect access to your device at all times so that the information stored locally on your device remains secure.

We are not responsible for any unauthorised access or loss of personal data beyond our control, including access or loss caused by you failing to password protect access to your device.

7. Marketing & Analytics ►

We take privacy very seriously and will only use your personal information for the purposes laid out in this ITB Driver App Privacy Policy. If you have opted in, we will contact you about marketing – for example, to offer other services related to the use of the App or to ask if you want to take part in a competition we might run.

You are free to object to receiving any marketing material and can edit your marketing preferences at any time. To opt out of marketing communications please email unsubscribe@insurethebox.com, or click "unsubscribe" on any marketing message we send you.

Please be aware that we have a genuine business need to be able to contact you to discuss how your policy is being administered. This form of contact falls outside of your marketing preferences and must continue in order for us to be able to provide you with a policy effectively. This will never include marketing material and all information will be strictly related to your policy.

What personal information will we collect and where will we collect it from?

If you have opted in, we collect certain information when you visit, use or navigate our Apps. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Apps and other technical information. This information is primarily needed to maintain the security and operation of our Apps, and for our internal analytics and reporting purposes.

In accordance with your marketing preferences, we may also collect the following information:

- **Online Identifiers:** We collect devices; applications; tools and protocols, such as IP (Internet Protocol) addresses or others such as the ones used for analytics and marketing; device's geolocation; and other similar data.
- **Geo-Location Information:** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Access:** We may request access or permission to certain features from your mobile device, including your mobile device's Bluetooth, calendar, camera, contacts, microphone, reminders, sensors, SMS messages, social media accounts, storage, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data:** We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.
- **Push Notification:** We may request to send you push notifications, including trip notifications which let you know how you have been driving at the end of a trip. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

What will we use your personal information for?

Please refer to Section 3 above for details about what we will use your personal information for when providing you with App services. Below, we provide you with some more detailed information about our marketing processing:

Type of Processing	Grounds for using personal information	Grounds for special categories
To ask you to take a survey or leave us a customer review/testimonial	<ul style="list-style-type: none"> • We have a genuine business need (<i>Legitimate Interest to gather feedback to improve our services</i>) 	We will not process your special categories of information for this purpose
To analyse data and send you marketing materials and promotional communications about our products & services relating to the App. To deliver targeted advertising to you to develop & display content and advertising (& work with third parties who do so) tailored to your interests and/or location	<ul style="list-style-type: none"> • Your explicit consent (<i>identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Apps, products, marketing and your experience</i>) 	We will not process your special categories of information for this purpose

Fulfil and manage your rewards as per the App Terms & Conditions	• Your explicit consent	We will not process your special categories of information for this purpose
Administer prize draws and competitions	• Your explicit consent	We will not process your special categories of information for this purpose
To enable user-to-user communications with each user's consent. For example LiveChat	• Your explicit consent	We will not process your special categories of information for this purpose

Where we require your consent for any of the processing above, we will always ask you explicitly. We may use and store this information in aggregated and anonymised form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

Who will we share your personal information with?

In line with your marketing preferences, we may share your personal information in the following situations:

- **Third-Party Service Providers:** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: data analysis, email delivery, hosting services, customer service and marketing efforts. Our selected third parties may use tracking technology on the Apps, which will enable them to collect data about how you interact with the Apps over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell or trade any of your information with third parties for their promotional purposes.
- **Third-Party Advertisers:** We may use third-party advertising companies to serve ads when you visit the Apps. These companies may use information about your visits to our website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you. See our **Cookie Policy** for further information.
- **Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honour this Policy. Affiliates include our parent company or other companies that we control or that are under common control with us.
- **Business Partners:** We may share your information with our business partners to offer you certain products, services or promotions.
- **Other Users:** When you share personal information (for example, by posting comments) or otherwise interact with public areas of the Apps, such personal information (name) may be viewed by all users and may be publicly distributed outside the Apps in perpetuity.

8. Your rights ►


Under data protection law you have a number of rights in relation to the personal information that we hold about you. For full information on these rights, please refer to the **main insurethebox Privacy Policy**. You can exercise these rights by contacting us. We will not usually charge you in relation to a request.

9. Contact us ►


For any queries relating to the App or your insurethebox insurance policy please contact Customer Services:

 Service Department, insurethebox, PO Box 1308, Newcastle upon Tyne, NE12 2BF


 service@insurethebox.com

 0330 022 9488

For any queries relating to a new or existing claim please contact our Claims Department:

 Claims Department, insurethebox, PO Box 1308, Newcastle upon Tyne, NE12 2BF

 claims@insurethebox.com

 0333 103 8026

If your query is related to how we collect, store and use your personal data, or if you would like to exercise the rights set out above and in your insurethebox Privacy Policy, you may contact our Data Protection Officer:

 The Data Protection Officer, Aioi Nissay Dowa Insurance UK Limited, PO Box 1308, Newcastle upon Tyne, NE12 2BF

 DPO@insurethebox.com

10. Updates to this Privacy Policy ►

We may need to make changes to this Privacy Policy periodically, for example, as the 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 Privacy Policy was last updated on 19/11/2020 and comes into effect on 16/12/2020.