



Customer Experience Privacy Policy

Our 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 Customer Experience Privacy Policy sets out details of the information that we may collect about you and how we may use that information when providing us with information about your experience with us. Please take your time to read this Customer Experience Privacy Policy carefully. When using our website, this Customer Experience Privacy Policy should be read alongside the policy Terms and Conditions and the Cookie Policy.

1. About Insure The Box ►

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 for you to be able to provide us with information about your experience, 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, please see section 8 "Contact us".

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 you could be identified. For this processing, you may wish to remain anonymous. If you do wish to remain anonymous, we will not ask for any personal information and will not be able to link your survey response to your policy. However, if you do wish to be contacted by us, we will require your Vehicle Registration Number in order to locate your policy information and get in touch with you.

Certain types of personal information are considered to be "special categories of information" due to their more sensitive nature. We will not ordinarily process special categories of data relating to customer experiences. However, where special category data is relevant to your experience, for example an injury you sustained as a result of a road traffic accident, we will always ask you for your explicit consent. Please do not share any special category data relating to 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 process information relating to your experience	<ul style="list-style-type: none"> We have a genuine business need 	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"> We have a genuine business need We have a legal or regulatory obligation 	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"> We have a genuine business need 	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"> We have a genuine business need We have a legal or regulatory obligation 	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

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?

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.

Where you have provided us with information relating to your customer experience and your explicit consent to share this publicly, this information may be shared with the press or published on our website. We will always make this clear to you; your information would never be shared publicly or with the press without your explicit consent as above.

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 such as 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

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	Period
Personal Data	18 Months

We keep information relating to your experience for up to 18 months from when you provide this information to us. If you no longer wish for us to process your customer experience information, please contact 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.

The right to access your personal information ►	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.
The right to rectification ►	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.
The right to erasure ►	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.
The right to restriction of processing ►	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.
The right to data portability ►	In certain circumstances, you can request that we transfer personal information that you have provided to us to a third party.
The right to object to marketing ►	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 8. 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.
The right to object to processing ►	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.
Rights relating to automated decisions ►	You will not be subject to any automated decisions for this purpose.
The right to withdraw consent ►	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.
The right to lodge a complaint with the ICO ►	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: www.ico.org.uk . 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.

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:

- 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, Aioi Nissay Dowa Insurance UK Limited, PO Box 1308, Newcastle upon Tyne, NE12 2BF

 DPO@insurethebox.com

9. Updates to this Privacy Policy ►

We may need to make changes to this Customer Experience 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 26th November 2021.