

## **SMART Cover**

### **Data Protection**

This notice contains important information about the use of your personal information. Please make sure you read this notice carefully. By taking out this policy, you confirm that we may use your personal information in the ways outlined in this notice. As the terms of this notice will also apply to anyone else insured under your policy, you should show this notice to anyone else whose name you give to us, in connection with your insurance policy.

### **Who we are**

We are Aioi Nissay Dowa Insurance UK Limited and Red Sands Insurance Company (Europe) Limited.

In this section, 'we', 'us' and 'our' refers to Aioi Nissay Dowa Insurance UK Limited and any holding or subsidiary companies (including but not limited to Toyota Insurance Management SE) and Red Sands Insurance Company (Europe) Limited. If you want to know more about the Aioi Nissay Dowa Europe group please go to [https://www.aioinissaydowa.eu/en/our\\_organisation.cfm](https://www.aioinissaydowa.eu/en/our_organisation.cfm)

When you apply for SMART Cover, your data will be collected and used by AutoProtect MBI Limited who arrange and administer your policy on our behalf.

You can ask for further information about our use of your personal information or complain about its use, by contacting the Data Protection Officer at: 7<sup>th</sup> Floor 52-56 Leadenhall Street, London EC3A 2BJ or [dpo-privacy@aioinissaydowa.eu](mailto:dpo-privacy@aioinissaydowa.eu).

You should also read all our privacy policy as this details how we will use your data for activities not related to the administration or arrangement of your insurance policy i.e. the use of your data for marketing purposes etc.

### **Your Information**

In order for us to provide and manage our services to you we will ask you to share your personal information with us. The information we collect about you varies depending on your particular circumstances and requirements and may include:

- general information about you such as your name, address, e-mail address, contact details and date of birth;
- details about the vehicle you want to insure;
- financial details, such as bank account and card details;
- information about your use of our website (IP address)
- Your marketing and communication preferences

### **How we collect your data**

We may collect personal information from the following sources:

- you or someone connected to you as part of a quotation or claim;
- publicly available sources of information, such as social media;
- third party databases made available to the insurance industry as well as databases where you have given your permission to share information with a third party like us;

- Information through “Cookies” and other similar technologies (e.g. pixel tags or links);
- our website, we record your computer’s IP address when you visit our website.

If you have provided information to us about someone else, you would have confirmed that you have the consent of these individuals to share their personal information with us.

**How we use your personal information**

We and/or our carefully selected third parties, associated companies, introducers, intermediaries and reinsurers, may collect and use your personal information to:

- assess your insurance application and arrange your policy;
- manage your insurance policy including claims handling and issuing policy documentation to you; and
- provide you with the services described in your policy documents.

Without the collection of this information, we will be unable to assess your application and/or provide claims services.

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and for special categories of personal information, we must have an additional “legal ground” :

Purpose for processing ►	Legal grounds for using your personal information ►
To assess your insurance application	<ul style="list-style-type: none"> <li>• <b>For policyholders:</b> It is necessary to enter into or perform your insurance contract</li> </ul>
keep records and our correspondence with and about you to effectively manage our relationship with you and satisfy any legal and regulatory obligations we may have	It is necessary to perform the contract
prevent and detect fraud, financial crime and anti-money laundering	Our legitimate interests and legal obligation
carry out processes such as statistical and trend research and analysis which may include computerised processes which profile you to improve the products and services we offer	Our legitimate interests
help us improve and develop our internal databases and systems in order to improve the products and services we offer	Our legitimate interests
we may anonymise and combine the information you have given us to understand more about you, create new products and services as well as helping us with our marketing.	Our legitimate interests

recording and monitoring calls for training purposes, to improve the quality of our service, to help us deal with queries or complaints from you and to prevent and detect fraud and financial crime. We may also use CCTV recording equipment in and around our premises for monitoring and security purposes	Our legitimate interests
To investigate and manage claims made under an insurance policy	We have a genuine business need (to assess and pay claims and manage the claims process

We may share your information with third parties in order to communicate our similar products and/or services.

**Who we might share your information with**

We may share your personal information with:

- other insurers, reinsurers, business partners, agents or carefully selected third parties providing a service to us on our behalf, such as claims handling and administrative services;
- organisations that have a specific role laid out in law such as statutory bodies and regulatory authorities;
- organisations where we have a duty or are permitted to disclose your information by law;
- fraud prevention agencies and operators of registers available to prevent fraud;
- credit reference agencies to check your credit history
- third parties to recover money you may owe us or to whom we sell your debt;
- other insurers, brokers or intermediaries to whom we decide to sell any specific insurance policies;
- another company, if our business or part of it is bought or taken over by that company;
- Companies when we are trialling their products and services which we consider may improve our services to you;
- Other parties you have given us your permission to do so or there is sufficient reason to believe they are acting on your behalf.

Unless required by law, we would never share your personal data without the appropriate and necessary care and safeguards in place.

**Sharing information to prevent fraud**

In order to prevent and detect fraud, financial crime and anti-money laundering we may:

- collect personal information about you from databases as described and from publicly available sources;
- check your personal information against databases;

- share and check your personal information with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details will be passed to the fraud prevention agency. This information will be accessed and used by us, law enforcement agencies and other organisations to prevent fraud and money laundering. Other organisations may search the databases held by these fraud prevention agencies when you make an application to them for financial products. The information we share may be used by those companies when making decisions about you. We and other organisations may access and use, from other countries, the information recorded by fraud prevention agencies;
- share your personal information with operators or registers available to the insurance industry to check information you provide. These include the Insurance Fraud Bureau, Claims and Underwriting Exchange Register and Motor Insurance Anti-Fraud and Theft Register. We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents and suppliers;

We will use any personal information obtained about you, or anyone you have provided us information about, to carry out the above profiling activity as part of our investigations into fraudulent behaviour. Should fraud be identified as a result of such profiling activity, this could result in the rejection of an application for insurance, a claim and/or voidance of your policy.

**How we communicate with you about our similar products or services**

We will contact you, in order to communicate our products and/or services to you which we believe may be of interest to you and which relate to your general insurance needs. You can ask us to stop sending you marketing messages by contacting us at any time.

**Storage of your information**

The personal information we and our carefully selected third parties collect from you may be transferred to, stored and processed outside the European Economic Area (EEA). We or our service providers may use cloud based computer systems (i.e. network of remote servers hosted on the internet which process and store your information) to which foreign law enforcement agencies may have the power to require access. We will not transfer your information outside the EEA unless it was to a country our information regulator has assessed as having adequate data protection laws, or we had taken all reasonable steps to ensure the firm has the necessary privacy and security controls in place to protect your information as if it were in the EEA. Our contracts with these firms will detail the necessary requirements to ensure your information is protected. We will assess these firm's security arrangements from time

to time ensuring that they are only using your information as agreed. Should you wish to obtain further information about the safeguards we have in place, please contact the Data Protection Officer.

### **Retention of your personal information**

We will keep your information for as long as you are a customer. After you stop being a customer we may keep your data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons for example if there has been a claim involving a minor.

### **Your rights**

You have a number of rights concerning the personal information we use, these include the right to:

- ask for access to and a copy of your personal information;
- ask us to correct or delete the personal information;
- ask us to restrict or object to the use of your personal information;
- where you have previously given us your permission to use your personal information, withdraw that permission. Where your permission is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you do not wish us to contact you again;
- complain to the Information Commissioner's Office at any time if you object to the way we use your personal information. For more information please go to [www.ico.org.uk](http://www.ico.org.uk);
- object to an automated decision including profiling.

To discuss your rights or make a request, please contact the Data Protection Officer.

Please note that in some cases even when you make a request concerning your personal information, we may not be required, or may not be able, to honour it as this may result in us not being able to fulfil our legal and regulatory obligations or there is a minimum statutory period of time for which we have to keep your information. If this is the case then we will let you know our reasons.

### **Changes to your information**

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. You can help us do this by letting us know whenever your personal details change.

### **Dealing with others on your behalf**

To help you manage your insurance policy, subjecting to passing security questions, we will deal with you or your husband, wife, partner or civil

partner or any other person whom we reasonably believe to be acting for you if they call us on your behalf in connection with your policy.

For your protection, only you can cancel your policy or change the contact address.