



# Privacy Notice

## Motor Fleet

**MS&AD** Aioi Nissay Dowa Insurance Europe



# AIOI NISSAY DOWA INSURANCE COMPANY OF EUROPE SE

## PRIVACY NOTICE

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Aioi Nissay Dowa Insurance Company of Europe SE, German branch, values its customers and is committed to protecting and respecting your privacy. This Data Privacy Notice explains how we process and protect any personal data we collect or receive about you. This Data Privacy Notice applies to personal data provided by customers, brokers, coverholders, claimants, third party agents (TPAs) and complainants. Where you provide us with personal data about other individuals, you must provide this notice to them. Please read this Data Privacy Notice carefully to understand our practices regarding personal data.

We seek to comply with principles of “data minimisation”. This means we try to ensure that we avoid collecting or processing data other than the types and volume of personal data required to achieve the purposes set out in this Data Privacy Notice.

### Who we are

Your personal data has either been, or will be collected by, or transferred to, Aioi Nissay Dowa Insurance Company of Europe SE, German branch. We can be contacted via post at the below address. We aim to respond to all correspondence within one calendar month.

The Data Protection Officer  
Aioi Nissay Dowa Insurance Company of Europe SE, German Branch  
Carl-Zeiss-Ring 25  
85757 Ismaning  
Germany

Email: [data-protection-fleet@aioinissaydowa.eu](mailto:data-protection-fleet@aioinissaydowa.eu)

Our Data Protection Officer will handle any questions you may have on the use of your personal data and your rights as a data subject. This is covered in further detail under Your Data Subject Rights.

### Types of personal data we hold

We capture and process a variety of different types of personal data depending on the nature of the services involved. This includes but is not limited to:

Type of Personal Data	Example
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Official identification details	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number
Financial information	Bank account or payment card details, income or other financial information
Risk details	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to the health, criminal convictions, or other special categories of personal data of the people to be covered. For certain types of policies, this could also include telematics data (telematics data is data relating to where and how you or those covered drive and captures information relating to speed, acceleration, braking and other similar data)
Policy information	Information about the quotes you receive and policies you take out

Credit and anti-fraud data	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you
Previous and current claims	Information about previous and current claims, (including other unrelated insurances), which may including data relating to your health, criminal convictions, or other special categories of personal data and in some cases surveillance reports

Sometimes we may need to process special categories of personal data. These are certain types of personal data which require additional privacy protection. The special categories are:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic or biometric data;
- Health data;
- Sex life or sexual orientation.

Personal data and special category data may be required to allow us to provide a quote, underwrite your policy, consider your claim or provide other insurance and ancillary services.

## Why we use your personal data

We collect your personal data to help us with advising on, arranging, underwriting or administering an insurance contract or administering a claim under an insurance contract. Specifically:

### a) Advising on, arranging and underwriting your policy, including:

- Performing credit or money laundering checks
- Understanding your insurance requirements to offer you a product that matches your needs and circumstances
- Gaining a reasonable understanding of the nature of the risk to be covered by the policy
- Providing competitive and appropriate pricing
- Contacting you to renew your policy for another year

### b) Administering your policy, including:

- Managing any changes to your policy
- Providing and improving client services as appropriate
- Maintaining contact with you, for issues relating to your policy and general customer contact

### c) Administering your claims, including:

- Registering your claims
- Assessing your claims, including any liaison with third parties potentially involved in your claims, e.g. communications regarding car repairs or health information
- Running due diligence checks e.g. money laundering
- The investigation of fraudulent claims
- The defence of or prosecution of valid and legal claims

### d) Further reasons, including:

- Any sale or transfer of our policies to another company due to restructuring

- To allow us to perform the essential practice and process of underwriting
- Analysing our clients and the products they select
- To ensure we comply with any legal or regulatory obligations
- The testing of our systems and processes where imitation data is unavailable. Testing which uses personal data will only be carried out in limited circumstances and only when appropriate safeguards and controls have been put in place

## **Our legal bases for processing your personal data**

We process personal data where necessary in order to:

- Engage with you when you or someone acting on your behalf asks us for a quote and are considering entering into a contract;
- Satisfy our obligations under a contract with a client or customer;
- Comply with a legal obligation;
- Process data as may be required in the public interest, such as detecting and preventing fraud;
- Pursue our legitimate interests in providing clients and customers with insurance services.

We may need to process your special category data when we:

- Advise, arrange, underwrite or administer an insurance policy or administer a claim under an insurance policy;
- Protect, investigate, and defend legal claims;
- Process data for reasons of substantial public interest and where such processing is necessary: i) for an insurance purpose (e.g. assessing your insurance application and managing claims); or ii) to prevent and detect an unlawful act (e.g. fraud).

## **Who we share personal data with**

To allow us to meet our obligations and effectively provide our services to you, it may be necessary to pass your personal data onto external parties. These external parties may include:

- Credit reference agencies
- Anti-fraud databases
- Banks
- Claims handlers
- Lawyers and Solicitors
- Loss adjustors
- External parties involved in the claim
- Private investigators
- The police and law enforcement
- The Motor Insurers' Bureau of Ireland
- External parties involved in the investigation, defence or prosecution of claims
- Other insurers (under court order or to prevent and detect fraud)
- Irish, German or other regulators as far as required by law
- Aioi Nissay Dowa Insurance Company of Europe SE is part of the MS & AD Group, and we may share data with other Insurers with that group.
- Our suppliers and sub-contractors for the performance of any contract we have with them
- Reinsurers

Your data will be shared securely, and only when absolutely necessary. It will never be sold on to external parties or organisations for marketing purposes.

## International data transfers

As MS&AD are a global group we may transfer or share your data outside the European Economic Area for our operational procedures. It may also be processed by staff operating outside the EEA who are working for us or one of our suppliers. We will always take steps to ensure your data is treated and transferred securely with appropriate safeguards and controls in place.

## Your data subject rights

Under Data Protection regulation you have the right to:

- Obtain a copy of your personal data held by Aioi Nissay Dowa Insurance Company of Europe SE
- Have any incorrect personal data updated
- Request the erasure of any of your personal data
- Restrict the use of your personal data
- Object to the use of your personal data
- Request the personal data you provided to Aioi Nissay Dowa Insurance Company of Europe SE to be moved to another organisation

If you wish to exercise any of these rights please email the Data Protection Officer at [data-protection-fleet@aioinissaydowa.eu](mailto:data-protection-fleet@aioinissaydowa.eu) stating your request and contact details. In order for Aioi Nissay Dowa Insurance Company of Europe SE, German branch to respond to your requests effectively and efficiently, please provide any further information you feel is necessary.

Alternatively, you can write to the Data Protection Officer at:

The Data Protection Officer  
Aioi Nissay Dowa Insurance Company of Europe SE, German Branch  
Carl-Zeiss-Ring 25  
85757 Ismaning  
Germany

If you contact us regarding the exercise of these rights, we will always seek to implement your wishes. In some cases (particularly where the request relates to the deletion of your personal data, restriction of use of personal data or the objecting to the use of personal data) there may be reasons why we are not able to fully comply with your request, particularly where we are required to keep and use that data to comply with legal or regulatory requirements.

## Complaints

We aim to provide a high level of service and we want you to tell us when we don't. We take all complaints we receive seriously and aim to resolve them promptly, diligently and fairly.

You have the option to lodge a complaint with the Data Protection Officer mentioned above or with a supervisory authority for data protection.

## Where we might collect your personal data from

We might collect your personal data from various sources including:

- You;
- Your family members, employer or representative;
- Other insurance market participants such as, authorised agents, service providers, reinsurers, other insurers, legal advisers, loss adjusters and claims handlers;
- Credit reference agencies;
- Anti-fraud databases, sanctions lists, court judgements and other databases;

- Government agencies
- Open electoral register; or
- In the event of a claim, third parties including any other party to the claim (such as a claimant/defendant), witnesses, experts (including medical experts), loss adjustors, lawyers and solicitors, and third party claims handlers.

Which of the above sources apply, will depend on your particular circumstances.

## **Automated decision making**

In some cases we use an automated decision making process to generate a quote to provide you with an insurance service; this process will only use the information which you have provided to us and will make an overall assessment of your application. This assessment will consider the level of risk involved and if applicable, generate a quote for the insurance service. The automated decision making process is regularly tested to ensure it remains fair, effective and unbiased. If you object to the use of automated decision making, please contact the Aioi Nissay Dowa Insurance Company of Europe SE, German branch Data Protection Officer. Email: [data-protection-fleet@aioinissaydowa.eu](mailto:data-protection-fleet@aioinissaydowa.eu)

This Privacy Notice was last updated on 30th March 2020 and comes into effect on 30th March 2020.

