

## **PRIVACY POLICY**

### **1: Introduction**

Covermore UK respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you use our services, or otherwise access any of our products and services and tell you about your privacy rights and how the law protects you.

### **2: Important Information and who we are**

#### **PURPOSE OF THIS PRIVACY POLICY**

This privacy policy outlines how we manage your personal information. It also describes the types of personal information held for varying purposes, and how that information is collected, held, used, disclosed, destroyed or de-identified.

#### **CONTROLLER**

Cover-More Insurance Services Limited ("Covermore UK") acts as the data controller and is responsible for your personal data. Covermore UK is part of the Cover-More Group. The Cover-More Group is a travel insurance, medical assistance, and data analytics group of companies. In this privacy policy when we refer to "**Cover-More**", "we", "our" or "us", we mean Cover-More UK.

It is important that you read this privacy policy together with any other policies we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and is not intended to override them. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us at [dataprotection.uk@covermore.com](mailto:dataprotection.uk@covermore.com).

#### **Our Contact Information**

Parkview 82 Oxford Road,  
Uxbridge  
Middlesex  
UB8 1UX  
020 3302 2296

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number Fax: 01625 524 510 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### **CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### **THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do

not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **If You Fail to Provide Your Personal Data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### **3: How We Collect About You**

Personal data, or personal information, means any information about an individual from which that person can be identified. It doesn't include data where the identity has been removed (anonymous data).

Cover-More collects personal information from and on behalf of customers, business partners, suppliers, employers (relating to corporate policies), other insurers and third-party service providers. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together into several categories:

- **Identity data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact data** includes billing address, delivery address, email address and telephone numbers.
- **Financial data** includes bank account and payment card details.
- **Transaction data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Health data:** our health information, such as pre-existing medical conditions, is generally required to arrange travel insurance, to decide on a claim or to provide you with medical assistance. Health information is sensitive personal data.
- **Recorded call data** If you contact us by telephone, these calls may be recorded for training, quality, and business purposes.
- **Technical data** includes IP (internet protocol) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile data** includes your username and password, purchases or orders made by you.
- **Usage data** includes information about how you use our website, products, and services.
- **Marketing and communications data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with your policy.

### **4: Use and Disclosure of Your Data**

We use your personal data to provide you with the relevant product or service you have requested including assessing your travel insurance application; identifying you; to manage and administer the product or service; assessing and paying a claim; or to provide you with assistance when travelling.

We also use the information of insured persons and claimants, to undertake analysis and actuarial processing which help us to deliver more accurate premiums, better assess claims, and improve the relevance of our products.

Everything we do with your personal data is underpinned by a "lawful basis". These are:

- where the processing is necessary in connection with providing you with a quotation and/or contract of insurance and/or provision of insurance services that you have requested (for example, assessing your policy application, receiving payments, or making payments on claims, and providing you with assistance which you are entitled to under your policy);
- to comply with our legal or regulatory obligations (for example, maintaining proper records, and complying with reporting requirements to our regulators); or (iii) for our "legitimate interests" (see below).

Where use of your personal information is not necessary for your quotation or policy, or for compliance with a legal or regulatory obligation, that use will instead be in our legitimate interests, in order to provide our services to you more effectively, including providing you with information about our products and services, and to operate our business as an insurer and assistance provider. We will always ensure that we keep the amount of information collected and the extent of any processing to the minimum required to meet this legitimate interest. Examples of our legitimate interests are:

1. to identify you when you contact us;
2. to deal with policy administration
3. to assess claims;
4. to reassess premiums at renewal;
5. to obtain feedback on the service we provide to you (including dealing with complaints or queries);
6. to administer our website and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes;
7. for fraud prevention and detection purposes;
8. to build actuarial models.

### **Your Sensitive Data**

Your health information, such as pre-existing medical conditions, is generally required to arrange travel insurance, to make a determination on a claim or to provide you with medical assistance.

Health information is sensitive personal data. If you provide your sensitive personal data to us via a third party, you must provide us with your consent via the third party, and if you provide sensitive personal data to us on behalf of other individuals, you must obtain their consent on our behalf.

Subject to certain exceptions set out below, we will not collect your Sensitive Personal Data without your consent. The exceptions to reliance on your consent apply where the collection, use and disclosure of the Sensitive Personal Data:

- is necessary for the provision of emergency assistance in order to protect your vital interests, in circumstances where you are unable to give consent.
- is necessary for public interest reasons, on the basis of UK law, such as the prevention of fraud.
- is necessary for the establishment, exercise, or defence of a legal claim.

### **5: Disclosure of Your data**

We will only share (disclose) your personal information with third parties if it is required to fulfil service or product obligations to you, or if it is required under law or in an emergency situation.

Before discussing the progress of a claim or medical and non-medical assistance with third parties (other than the parties involved in providing such a service), for example, a relative or companion, we will obtain appropriate consent from you, your parent or guardian, power of attorney or executor (as relevant).

For a list of the types of entities Cover-More generally discloses your personal information to please refer to our list of third-party [data processors](#).

By purchasing a policy through us, we may send your information to overseas parties if required to provide you with medical and non-medical assistance or to progress and assess your claim. In addition, we may use third party service providers (for example, IT service providers) who operate or store data outside of the European Economic Area or the UK.

The countries we typically disclose your personal information to are generally located in the geographic regions you travelled during the duration of your policy or countries where Cover-More's offices are located (in particular New Zealand; Australia; Malaysia; China; India and the USA). The nature of our business means it is often necessary for us to send your personal information outside the European Economic Area or the UK. This occurs because our business and the third parties identified in 'Entities Cover-More typically discloses to and/or collects from' have operations in countries across the world. For example, where you are flying outside of the European Economic Area or the UK, and you require assistance, your personal information will be transferred to the medical provider responsible for your care.

This may involve sending your data to countries where under their local laws you may have fewer legal rights. However, we will only transfer your personal data to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. Where we transfer personal information to third parties, we rely on mechanisms including data transfer agreements, certification schemes or model SCC Clauses or exemptions (such as where the transfer is necessary in the context of a legal claim).

You have the right to ask us for more information about the safeguards we have put in place as mentioned above.

## **6: How Long Will You Use My Personal Data For?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six tax years plus current tax year after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notification.

## **7: Your Legal Rights**

- **Request access** to your personal data (commonly known as a "data subject access request"): This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of your personal data: This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data: This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data: Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing your personal data: This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - if you want us to establish the data's accuracy; or
  - you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it
- **Request the transfer** of your personal data to you or to a third party: We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data: However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

#### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests, in which case we will inform you of an extension period of up to 2 months. In this case, we will keep you informed on progress.