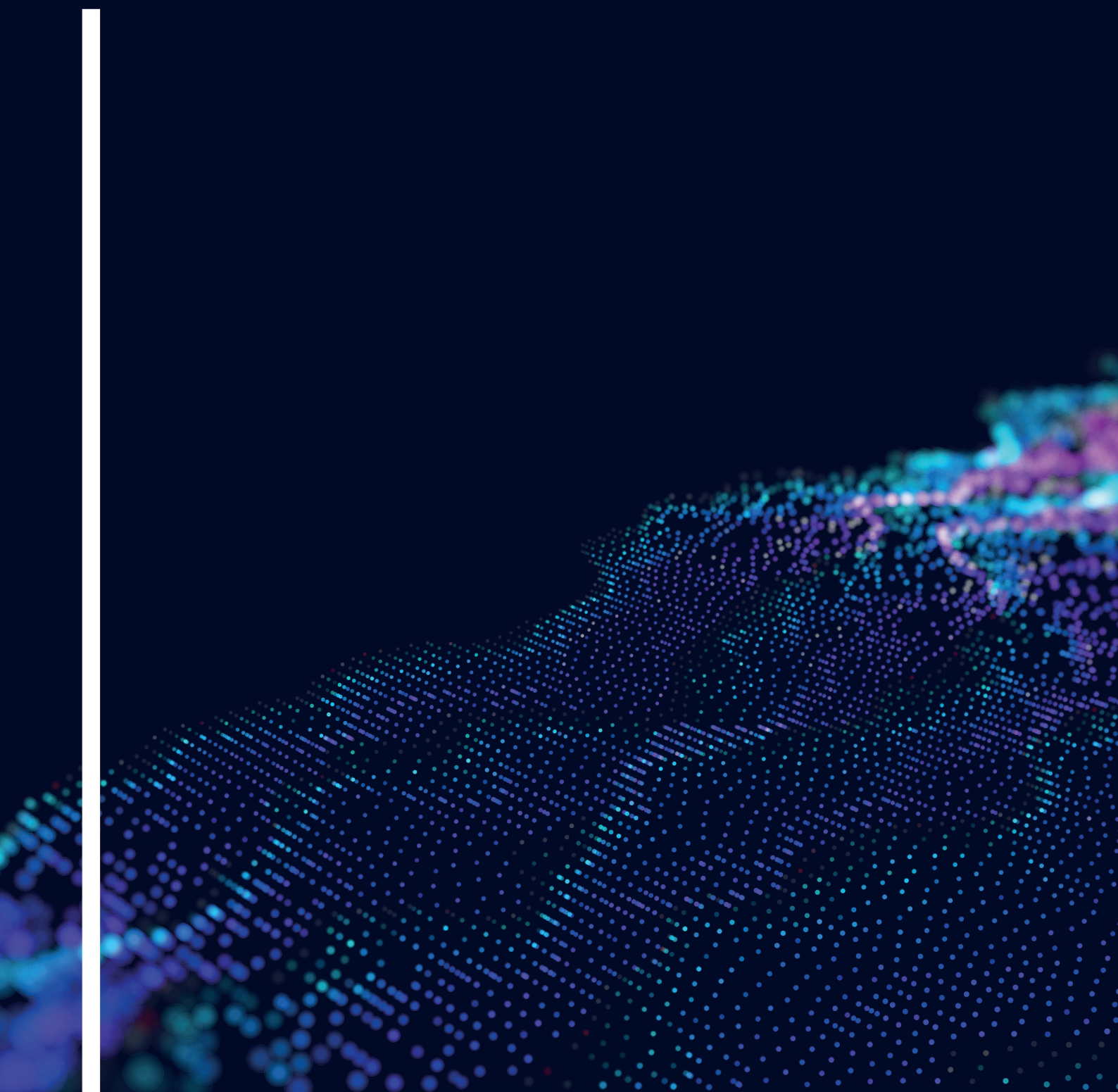


UK Privacy Notice

JIA Motor Fleet



Our Privacy Notice

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 Notice sets out details of the information that we may collect about you and how we may use that information. Please take your time to read this Privacy Notice carefully. When using our website, this Privacy Notice should be read alongside the website terms and conditions.

1. About Us ►

In this Privacy Notice references to "**we**" or "**us**" refer to Aioi Nissay Dowa Insurance UK Limited.

Aioi Nissay Dowa Insurance UK Limited underwrite and administer your JIA Motor Fleet policy and 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 section 8 "**Contact us**". For more information about the external parties we share your personal data, please read section 3 of this Privacy Notice.

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 driving licence number or your insurance policy number.

Certain types of personal information are considered to be "**special categories of information**" due to their more sensitive nature. Sometimes we will ask for or obtain **special categories of information** because it is relevant to your insurance policy or claim. For example, to assess risk appropriately, we will ask our customers about previous motoring convictions. This Privacy Notice highlights where we are likely to obtain **special categories of information**, and the grounds on which we process this data. We will only process **special categories of information** where they are relevant and will never process certain types e.g. details of your sex life.

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 ►

The personal information that we collect will depend on our relationship with you. For example, we will collect more detailed information about you if you have become a customer than if you simply ask for a quote. We have included a number of sections below – simply read those which most apply to your relationship with us.

If you provide personal information to us about other people you must provide them with a copy of this Privacy Notice, and obtain relevant consent from them where we have indicated in this Privacy Notice that we need it.

3.1 If you have been involved in an accident with someone covered under an insurance policy with us

(This section shows what personal information we collect about you and use if you have made a claim against a policyholder who is insured with us)

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

We will collect the following personal information from you, where relevant to your claim:

- **Individual details:** Your name, address, contact details (e.g. email / telephone), gender, marital status, date of birth, nationality
- **Employment information:** Your national job title and the nature of the industry you work in
- **Identification details:** Your national insurance number, passport information, driving licence number
- **Previous and current claims:** Any previous insurance policies you have held and claims made against those policies
- Information which may be relevant to your claim, including the name and contact details of your insurer, details about your car / property, and details about your claim (including any statements, photos / video footage, claims assessment reports, telematics data). This information may include the following **special categories of information** relating to you:
 - o **Health data:** Physical or mental health factors which are relevant to your claim (e.g. where you have been injured in a motor accident and the driver is insured through us). This may include medical records relating to any injuries
 - o **Criminal convictions** which are unspent under the Rehabilitation of Offenders Act 1974 (England, Scotland and Wales) or Rehabilitation of Offenders (Northern Ireland) Order 1978. This includes both motoring and non-motoring offences / alleged offences which you have committed, or any court sentences which you are subject to
- **Financial information:** Bank and payment information
- **Other information:** that we capture during recordings of our telephone calls, or if you make a complaint. **This may include special categories of information** you volunteer when communicating with us. We will only process such information to the extent necessary in connection with the incident or where in connection with legal proceedings.

We use external sources to supplement and verify information the information above, and also to provide the following new information:

- **Credit and anti-fraud data:** Credit history, credit score, sanctions and criminal offences, bankruptcy orders, individual voluntary arrangements (IVAs) or county court judgements, and information received from various anti-fraud databases. Some of this information (e.g. criminal offences) may include **special categories of information** relating to you
- **Demographic data:** Lifestyle indicators such as income, education, and size of your household
- **Open source data:** unstructured data which is in the public domain, including social media, about you, or the circumstances of any accident.

The external sources that provide us with information about you include:

- Other parties involved in your claim, including any named individual insured through us, passengers, witnesses, or other third party claimants
- Other MS&AD Insurance Group companies
- Third party suppliers we appoint to help us:
 - carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, debt collection agencies, document management providers, outsourced business process management providers, our subcontractors and tax advisors
 - provide a service in relation to a claim (such as external claims handlers, our accident repair network, medical experts, claims investigators and, in limited circumstances, private investigators)
- Credit reference agencies
- Providers of demographic data and vehicle data
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as "CUE")
- Insurance industry bodies and databases (including the Motor Insurance Database, the "MID")
- Government agencies and bodies such as the DVLA/DVA, HMRC, Department for Work & Pensions, or professional regulators (e.g. the Financial Conduct Authority)
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media)
- The police and other crime prevention and detection agencies. We and fraud prevention agencies may enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime
- Other third parties involved in your insurance policy or a claim (e.g. other insurers)
- Our reinsurers.

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:

- We have a **genuine business need** to use your personal information (e.g. to keep a record of the decisions we make when different types of applications are made, keep business records, carry out strategic business analysis, review our business planning and develop and improve our products and services). When using your personal information in this way, we will always consider your rights and interests
- We have a **legal or regulatory obligation** to use your personal information (e.g. to meet record-keeping requirements of our regulators).

For **special categories of information**, we must have an additional legal ground for processing. We will rely on the following:

- It is in the substantial public interest and it is necessary: i) for an insurance purpose (e.g. assessing your insurance application and managing claims); or ii) to prevent and detect and unlawful act (e.g. fraud)
- To establish, exercise or defend legal rights (e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves).

We've shown how we use your personal information, and the legal grounds we rely on, in the table below:

Type of Processing	Grounds for using personal information	Grounds for special categories
To manage claims	<ul style="list-style-type: none"> • We have a genuine business need (to assess and pay your claim and manage the claims process) • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • To establish, exercise or defend legal rights
To verify your identity, prevent and investigate fraud	<ul style="list-style-type: none"> • We have a genuine business need (to prevent and detect fraud and other financial crime) 	<ul style="list-style-type: none"> • It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud) • To establish, exercise or defend legal rights
To comply with our legal or regulatory obligations	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • To establish, exercise or defend legal rights • It is necessary for an insurance purpose
To communicate with you and resolve any complaints that you might have	<ul style="list-style-type: none"> • We have a genuine business need (<i>to send you communications, record and handle complaints</i>) 	<ul style="list-style-type: none"> • You have given us your explicit consent • To establish, exercise or defend legal rights
To provide improved quality, training and security (e.g. through recorded or monitored phone calls to / from us, or customer satisfaction surveys)	<ul style="list-style-type: none"> • We have a genuine business need (<i>to develop and improve our products and services</i>) 	We will not process your special categories of information for this purpose
Managing our business operations (e.g. keeping accounting records, analysing financial results, meeting audit requirements, receiving professional advice, and holding our own insurance)	<ul style="list-style-type: none"> • We have a genuine business need (<i>to carry out business operations and activities that are necessary for the everyday running of a business</i>) 	We will not process your special categories of information for this purpose
For insurance administration purposes including trend analysis, actuarial work, pricing analysis, analysis of customer experience, planning service delivery, risk assessment and costs and charges	<ul style="list-style-type: none"> • We have a genuine business need (<i>to develop and improve our products and services</i>) 	We will not process your special categories of information for this purpose

For analytics purposes including machine learning and AI development to improve pricing, operational services and to detect and prevent fraud. Where possible, we will do anonymously, but occasionally, with some effort, it may be possible to identify individuals within large datasets.

• We have a genuine business need **(to develop and improve our products and services)**

• It is in the substantial public interest to prevent or detect unlawful acts **(where we suspect fraud)**

Who will we share your personal information with?

On occasion, we will 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 parties involved in the administration of the relevant insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts
- Other insurers (e.g. where another insurer has previously provided you with a policy or handled a claim), and our reinsurers
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers
- Insurance brokers and other intermediaries
- Credit reference agencies
- Insurance industry bodies and databases (including the Motor Insurance Databases, the "MID")
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as "CUE")
- Government agencies and bodies such as the DVLA/DVA, HMRC, Department for Work & Pensions, or regulators (e.g. Financial Conduct Authority)
- Professional regulators (e.g. the Financial Conduct Authority in the UK)
- The police and other crime prevention and detection agencies. We and fraud prevention agencies may enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime
- Selected third parties in connection with any sale, transfer or disposal of our business.

If you would like more information about any of the above uses of your personal information, please see section 10 "Contact us".

3.2 Where you witnessed an accident involving someone covered under an insurance policy through us

(This section shows what personal information we collect about you and use if you are a witness to an incident which involves one of our customers)

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

We will collect the following personal information from you:

- **Individual details:** Your name, address, contact details (e.g. email / telephone), gender, marital status, date of birth, nationality
- **Employment information:** Your job title and the nature of the industry you work in
- **Identification details:** Your national insurance number, passport information, driving licence
- **Claims information:** In relation to any incident or alleged incident that you have witnessed
- **Photo or video data:** including photos or footage recorded relating to a claim (including accident circumstances and interviews)
- **Other information:** that we capture during recordings of our telephone calls, or if you make a complaint. This may include other **special categories of information** you volunteer when communicating with us about the incident that you witnessed. We will only process this information where it relates to the incident itself or legal proceedings.

We use external sources to supplement and verify information the information above, and also to provide the following new information:

- **Claims assessment reports:** by claims investigators, and in limited circumstances, private investigators
- **Open source data:** unstructured data which is in the public domain, including social media, about you, or the circumstances of any accident.

The external sources that provides us with information about you include:

- Other parties involved in the incident you witnessed (such as any named individual insured through us, passengers, other witnesses, third party claimants, brokers, insurers, and the emergency services)
- Other third parties who provide a service in relation to a claim (such as external claims handlers, our accident repair network, medical experts, claims investigators and, in limited circumstances, private investigators)
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media)
- Other MS&AD Insurance Group companies.

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:

- We have a **legal or regulatory obligation** to use your personal information (e.g. our regulators impose certain record-keeping rules which we must adhere to)
- We have a **genuine business need** to use your personal information (e.g. to keep a record of the decisions we make when different types of applications are made, keep business records, carry out strategic business analysis, review our business planning and develop and improve our products and services). When using your personal information in this way, we will always consider your rights and interests.

For **special categories of information**, we must have an additional legal ground for processing. We will rely on the following:

- **It is necessary for an insurance purpose** and it is in the substantial public interest. This will apply where: (i) we are assisting with any claims under a policy **(we will only rely on this legal ground if we have not been able to obtain or you have not given us your explicit consent)** and; (ii) undertaking any activities to prevent and detect fraud.
- To **establish, exercise or defend legal rights** (e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves).

We've shown how we use your personal information, and the legal grounds we rely on, in the table below:

Type of Processing	Grounds for using personal information	Grounds for special categories
To investigate and manage claims made under an insurance policy	<ul style="list-style-type: none"> We have a genuine business need (to assess and pay claims and manage the claims process) 	<ul style="list-style-type: none"> You have given us your explicit consent or it is necessary for an insurance purpose To establish, exercise or defend legal rights
To comply with our legal or regulatory obligations	<ul style="list-style-type: none"> We have a legal or regulatory obligation 	<ul style="list-style-type: none"> You have given us your explicit consent To establish, exercise or defend legal rights
To prevent and investigate fraud	<ul style="list-style-type: none"> We have a genuine business need (to prevent and detect fraud and other financial crime) 	<ul style="list-style-type: none"> It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud) To establish, exercise or defend legal rights
For business processes and activities including analysis, review, planning and transactions	<ul style="list-style-type: none"> We have a genuine business need (to effectively manage our business) 	We will not process your special categories of information for this purpose

Who will we share your personal information with?

On occasion, we will share personal information within the MS&AD Insurance Group or with the following third parties for the purposes laid out in the table above:

- Other parties involved in the incident you witnessed
- Other insurers (e.g. where another insurer is also involved in the claim which relates to the incident you witnessed), and our reinsurers
- Third parties involved in the administration of an insurance policy or claim. These include loss adjusters, claims handlers, accountants, auditors, banks, lawyers, medical experts, and in limited circumstances, private investigators
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers
- Insurance industry bodies and databases (including the Motor Insurance Databases, the "MID")
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as "CUE")
- Government agencies and bodies such as the DVLA/DVA, HMRC, Department for Work & Pensions, or regulators (e.g. Financial Conduct Authority)
- The police and other crime prevention and detection agencies. We and fraud prevention agencies may enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime
- Selected third parties in connection with any sale, transfer or disposal of our business.

If you would like more information about any of the above uses of your personal information, please see section 8 "Contact us".

The external sources that provide us with information about you include:

- Other MS&AD Insurance Group companies
- Publicly available sources such as the electoral roll, court judgments, insolvency registers, internet search engines, news articles and social media sites
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).

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

If you would like more information regarding our data transfers, please see section 8 "Contact us".

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. We have a detailed retention policy in place which governs how long we will hold different types of information for. The exact time period will depend on the purpose for which we collect that information, for example:

Quotes:	15 months
Policies:	7 years
Claims:	7 years
Complaints:	7 years

In some circumstances depending on the nature of your policy and any claims made under it data may be retained for a further period in a 'locked down' system from which it is only accessed when a claim arises. It is retained for as long as a potential claim might be made under a policy.

Please note that Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to 6 years.

For more information about how long your personal information will be kept, please see section 8 "Contact us".

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 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 ►	If you have been subject to an automated decision and do not agree with the outcome, you can ask us to review it.
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.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued. For example, if you request erasure of your personal information, we would not have the information required to pay your claim. We will inform you of this at the time you make a 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:

- Where we capture your personal information through our website, we will do this over a secure link using recognised industry standard technology (SSL) which encrypts data that is transmitted over the internet. Most browsers will indicate this by displaying a padlock symbol on the screen
- 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 ►

You may contact our Data Protection Officer if you would like to exercise the rights set out above, 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@aioinissaydowa.eu

11. Updates to this Privacy Notice ►

We may need to make changes to this Privacy Notice 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 6th June 2023 and comes into effect on 14th June 2023.