

Privacy Policy

We **never** pass your information to third parties for any marketing purposes.

Strategic Insurance Services Limited (of which, Expatriate Group and Expatriate Healthcare are also trading styles) is committed to protecting and respecting customers' personal information.

This Privacy Policy relates to our use of any personal information we collect from you, such as via our websites, social media and information we collect through other means, such as email, in writing, in person, over the telephone or via other third party sources.

Our Approach to Privacy

The privacy and security of your personal information is very important to us. We want to assure you that your information will be properly managed and protected. The following sections detail:

What data we Receive

We receive personal information about you, when you contact us via any of the following channels: requesting or obtaining a quote, purchasing (or renewing) a product from us, using the Website, entering competitions, using live online chat, telephoning, texting, writing by post or email.

Unless otherwise advised, the services we provide are as follows:

This information may include any personal information that we collect and may include: personal details such as your name, address, e-mail address, telephone number, date of birth or age, gender, marital status, IP address. Additional information about your lifestyle and insurance requirements, such as details of your health, the countries you visit, sports in which you participate, hobbies in which you participate and any travel arrangements – including any expected changes to lifestyle in the future.

Information about your other policies, such as claims history, quotes history, payment history, claims data.

Sensitive personal information such as health information (for example alcohol consumed, recreational drug use, tobacco use, current state of health, existing conditions, family or personal history in relation to some conditions). We will always be clear to explain when and why we need this information and the purposes for which we will use it and will obtain your explicit consent to use sensitive personal information.

Information about your employment, including salary.

Personal information about others: We may collect information about other members of your household or family, for example, family members who may be included on your insurance policy or on whose life you take out an insurance policy.

If you give us information about another person it is your responsibility to ensure and confirm that: you have told the individual who we are and how we use personal information, as set out in this Privacy Policy; and you have permission from the individual to provide that personal information (including any sensitive personal data) to us and for us to process it, as set out in this Privacy Policy.

Information we collect through Cookies and similar technologies

We collect information through "Cookies" and other similar technologies (e.g. pixel tags or links), to remember you when you visit the websites and apps so we can improve your online experience to suit your needs. These help us understand how you and others use our websites and apps, view our products and respond to our advertising, so we can tailor direct marketing and enhance our overall product and service offering. This also saves you from re-inputting information when you return to the websites or apps.

When you receive direct marketing from us via email, we may use technology e.g. pixel tags or links to determine your use of and interest in our direct marketing.

When you visit one of our websites or apps we may record your device information including hardware and software used, general location, when and how you interact with our websites and apps and your registration and log-in activity when you use our online platforms. This information is retained and used to note your interest in our websites and apps, improve customer use experience, determine pricing and/or offer you available discounts.

We collect and use technical data and related information, including but not limited to technical information about device, system and application software, and peripherals, which is gathered periodically to facilitate the provision of software updates, app support and other services related to the app.

Information collected from third parties

We may use information about you from publicly available sources e.g. an Electoral roll. We may also obtain information about you from credit reference agencies and similar third parties.

Third Party information

We may obtain information about you from medical professionals or your employer. We will always seek your permission to contact these people for your information.

We may obtain information about you from our third party suppliers and other third party databases, such as commercial property sites, government sites for marketing insights, pricing research, product development, business strategy and to detect and prevent fraudulent activity.

Where we believe there may be fraudulent activity we may share your data with another insurance company, Third Party Administrator, insurance broker, fraud agency, fraud membership organisation or the police. Data is supplied and requested by Data Protection Act Section 29 request, of which more details can be found here <https://www.legislation.gov.uk/ukpga/1998/29/section/29>.

How we use the information we receive

We use the information that you provide us in a number of ways, but only ever to provide you with details and quotes about our products and services, to administer your policy, to provide you with renewal terms, to comply with a DPA Section 29 request and to provide you with

details about other products, to provide you with additional important information about Strategic Insurance Services Limited, any changes to products and services that we provide you. **We never pass your information to third parties for any marketing purposes.**

Services include:

Administration of quotes and policies, including to:

- improve your experience by reducing the number of questions we need to ask you
- assess your application for a product, service or quote,
- understand your risk so as to offer you our best price
- verify your identity and carry out anti-fraud checks,
- provide you with premium and payment options,
- check that you can afford a credit agreement
- administer your policy including updating you on and delivering our services.
- handle claims
- deal with complaints
- identify which products may be of interest to you and provide you with information about those products.
- provide you with tailored offers.

How we use information to improve our products

We may also use your information for research or statistical purposes, including to analyse how people use our Websites, view our products, respond to our advertising and to improve our understanding of what customers need.

We may use your information for training purposes, to improve our services and their delivery, for example by recording telephone calls.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

If you request a quote, or purchase a product or service, your personal information may be shared with and processed by the underwriter of your contract (and their reinsurers, if appropriate), your appointed introducers/intermediaries, as well as the policy holder (for a corporate policy), including third parties providing services to us (e.g. our 24 hour assistance provider).

Third Party Service Providers working on our behalf: We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to provide you with a 24 hour medical assistance helpline).

However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Your information may also be disclosed when, we believe in good faith that the disclosure is:

- required by law; or
- to protect the safety of our employees or the public; or
- required to comply with a judicial proceeding, court order or legal process; or
- in the event of a merger, asset sale, or other related transaction; or
- for the prevention or detection of crime (including fraud).

We may share your information with regulatory bodies in the UK and overseas, including outside the EU, as well as with other insurance companies (directly or via shared databases) to prevent and detect fraud.

Fraud Prevention and Detection

In order to prevent and detect fraud we may at any time:

- share information about you with other insurance provider, organisations and public bodies including the Police;
- undertake credit searches and additional fraud searches;
- check and/or file your details with fraud prevention agencies and databases, and
- if you give us false or inaccurate information and we suspect fraud, we will record this to prevent fraud and money laundering.

Data transfer and consent

Your information may be transferred by us to any country, including countries outside of the European Economic Area (EEA), for processing, storage, administration or any other use stated in this policy. The purposes and processing associated with any such transfer will comply with all applicable data protection regulations, including the UK Data Protection Act, and with our obligation to adequately protect and secure your personal information. Where required under applicable laws we will take measures to ensure that personal information handled in other countries will receive at least the same level of protection as it is given in the EEA.

By providing your personal information to us you consent to the transfer of your information as described above.

Security of your information

We are committed to protecting the confidentiality and security of the information that you provide to us and we put in place appropriate technical, physical and organisational security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information.

You should also be aware that communications over the internet, such as e-mails, are not secure unless they have been encrypted. The Websites may contain links to third party websites. These other websites will be subject to their own privacy policies which may differ from this Privacy Policy. You should carefully read the privacy policies of these websites before submitting any personal information.

Managing your marketing preferences

We may on occasion provide you with details on products and service that we think may be of interest to you or which may complement existing products that we provide you. You can opt out of these communications at any time.

We may:

- provide you with updates and offers for our products and services via marketing tailored to you through online digital services (e.g. online advertising, social media communications), or by direct marketing (e.g. phone, e-mail, text, post); and
- use information we hold about you to help us identify, tailor and package our products and services, determine pricing and offer discounts that may be of interest to you.

We will always give you the opportunity to 'opt out' of direct marketing when you complete a registration with us, request an online quote, purchase a product or service online or receive any email, text or other direct marketing communication.

You can change your marketing preferences at any other time by contacting us on the details given below in the 'Update your information or change your marketing preferences' section.

Update your information or change your marketing preferences

Please let us know if your information changes as it is important that the information we hold about you is accurate and up to date.

You can ask us to update or correct your personal information contacting us using any of the following methods:

By email:	data@strategicins.co.uk	data@expatriategroup.com
By post:	Data Protection Team Strategic Insurance Services Limited Delmon House 36-38 Church Road Burgess Hill RH15 9AE United Kingdom	Data Protection Team Expatriate Group Delmon House 36-38 Church Road Burgess Hill RH15 9AE United Kingdom

How to find out what information we hold about you and how to amend it or delete it

You have the right to request a copy of all the personal information we hold about you in a Subject Access Request.

Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data.

You have the right to:

- request from us access to and rectification or erasure of your personal data;
- the right to restrict processing;
- object to processing; and
- in certain circumstances the right to data portability.

If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal requirements. You should regularly check this Privacy Policy for updates. If there will be any significant changes made to the use of your personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website.

This policy was last updated on 18/09/2018.

How to contact us

For any questions or concerns relating to this Privacy Policy or our data protection practices, or to make a subject access request, please contact us at:

By email:	data@strategicins.co.uk	data@expatriategroup.com
By post:	Data Protection Team Strategic Insurance Services Limited Delmon House 36-38 Church Road Burgess Hill RH15 9AE United Kingdom	Data Protection Team Expatriate Group Delmon House 36-38 Church Road Burgess Hill RH15 9AE United Kingdom