



## PRIVACY NOTICE

This privacy notice describes how AXA Partners (also referred to as "we" or "us") process Personal Data relating to our policyholders, service users and related individuals, and other enquirers and users of our website ("you").

Pursuant to the definition provided by the EU regulation General Data Protection Rule, we are acting as Data Controller. We are accountable of any usage of your Personal Data made by us or on our behalf.

We may update this notice from time to time, and will publish the new version on our website. This notice was last updated on 4 April 2018.

This notice is set out in 10 sections:

1. Who we are
2. What information we collect (including where we collect it from) and how we use it
3. Sharing your information, and our relationship with other parties
4. Legal basis for use of your information
5. International data transfers
6. Retaining your information
7. Security of your information
8. Your legal rights, including your right to access a copy of data we hold
9. Our contact details
10. Related notices and terms

### 1. Who we are

AXA Partners UK is part of the worldwide AXA Group. We mediate the sale of travel insurance policies, provide administration services in relation to those policies, provide emergency assistance and settle claims. In carrying out these activities, we act as Data Controller, meaning we determine the way in which your data is used (as described in this privacy notice).

We have appointed a Data Protection Officer, who is responsible for overseeing use of Personal Data by us. You may contact the Data Protection Officer with any queries relating to the processing of your Personal Data by us, and to exercise your data protection rights (see section 8 below).

Contact details for the Data Protection Officer are set out at section 9 below.

### 2. Information we collect and how we use it

#### 2.1 Purchasing insurance or services directly from us

You may obtain a quote and purchase our insurance over the telephone or make a claim under your insurance policy. We will collect relevant information from you in order to provide you with the service you expect. Please note that only information absolutely necessary shall be collected.



These details include:

- Name (of policyholder and any other individuals who may benefit from the relevant insurance claims or services);
- Username and password for a website account (which you may set up in order to obtain a quote or purchase insurance or services) ;
- Address and contact details, including email address ;
- Level of cover and policy details (for insurance policies);
- Details of your policy, including the benefits to be provided under it
- Other details requested on application forms such as, but not limited to, your current state of health and any previous medical conditions from which you or the other beneficiaries under the policy may have had or are suffering from.
- Payment details, which may include your credit card or bank details.

We will also assign you a policy or contract number which we will record alongside your other personal details.

If you provide us with details relating to other individuals (for example, those with an interest under the policy), please ensure such individuals have given their consent to you providing their personal data (including medical data) to enable us to underwrite your insurance and are aware that we will use those details for the purposes of pricing and/or determining the benefits available under the relevant insurance policy or services. Please direct them to this privacy notice for more information.

Some information is necessary in order to provide you with the service you expect, if you do not provide us with the requested information, we may not be able to offer you the applicable insurance policy or services.

## **2.2 Purchasing insurance from our business partners**

You may purchase our insurance from one of our business partners (for example as a stand-alone product or an add-on to other insurance or a product you are buying from them). You may also purchase a policy which is underwritten by our business partner, but for which we process and service your claims (see section 2.3).

In these circumstances, our business partner will collect and share some of your Personal Data with us in order for us to underwrite and administer your policy (where we are the underwriter) and to provide you with relevant services if you make a claim.

These details may include, but may not be limited to:

- Name (of policyholder and any related individuals under the policy)
- Address and contact details
- Level of cover and policy details
- Medical data, for example, details of any pre-existing medical conditions from which you or any other beneficiary may suffer, relevant to the pricing and/or provision of benefits under your insurance policy
- Bank details for claims payments, reimbursements, policy checking.



Our business partner will also assign you a policy number which we will record alongside your other personal details.

### **2.3 Making a claim or requesting an emergency assistance service**

You may contact us by telephone or email:

- Make a claim under your insurance policy; or
- Request an emergency assistance service.

You may also enquire about such claims or emergency assistance services.

When you contact us in this way (or otherwise contact us for these purposes), we will collect additional information from you to assist with your enquiry, verify and handle your claim or assistance request, and, where appropriate, to settle the claim and provide the assistance services. This includes arranging for our service providers to respond to and deal with qualifying incidents in settlement of your claim or as part of the assistance services.

If you have purchased our insurance from one of our business partners, or where we are handling a claim under a policy underwritten by one of our business partners (see section 3.2 below), our claims handling service may use the brand of our business partner in dealing with your enquiry. However, the information we collect is used by us (rather than by our business partner) for these purposes.

In each case, the details we collect will include:

- Name, and policy or contract details
- Information about the claim or service request, including the surrounding circumstances, the assistance you require, and information within any related documents you provide to us.

This may include some Sensitive Data, and other information of a sensitive nature. For example, we may need to know information about you and individuals receiving emergency assistance services or involved in the assistance we provide, or other sensitive information about the circumstances of the claim or request. This is collected in order to make appropriate arrangements to deal with your claim and provide the relevant services.

We will also assign you a claim or service number, which we will record alongside your other personal details.

If you provide us with details relating to other individuals, please ensure such individuals are aware that we will use their details for the purposes of the insurance claim or service request, and direct them to this privacy notice for more information.

Calls to our call centers may be recorded, and we may keep additional records of our communications with you, and any arrangements made to settle your claim and provide you with services.



See section 2.4 below for more information about this.

## **2.4 Other use of our website and social media**

We may collect other personal details from users of our website or our social media accounts, for example users who send us queries, enter our competitions, or are involved in other activities run by us within this context. We may use such details in order to deal with your enquiry, and to administer the relevant competitions or activities.

Note that information provided over social media may also be used and stored by the social media provider, in accordance with its own terms and policies.

We may also use cookies or similar technologies to collect website usage information, including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths. We do not, however, seek to relate this information to you as an individual nor combine it with other data relating to you. For further information, please refer to the Cookies Policy.

Our website may include hyperlinks to, and details of, third party websites. Subject to our data sharing responsibilities (see section 3 below); we have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **2.5 Other collection and uses of your Personal Data**

We may also collect and use your Personal Data as follows:

- We may record calls made to us for the purposes of record-keeping, training, quality control.
- We may conduct surveys or ask you for feedback on our products and services, and may invite you to take part in focus groups. We use your responses and contributions to these for the purposes of quality control and improvement of our products and services.
- We carry out sanctions checking including to safeguard against fraud and money laundering, and in accordance with Government requirement.
- We may carry out audits of third parties who handle claims under our policies (see section 3.4 below), which may involve us reviewing samples of personal details used in relation to such services.
- If you contact us, for example over email, by telephone, by post, or over our website or social media, we may retain your contact details and your communication in order to handle (see Art. 6 – for retention period information) your query and maintain records of communications.
- We maintain records of our activities and services, which may include communications exchanged with you or concerning you.
- We may use your Personal Data in order to handle complaints about our activities, and to assess and manage any potential or actual legal action arising from such complaints.
- We may use some Personal Data for analytical purposes and to assist us in improving our processes, products and services, for example root cause analysis on complaints. We seek to use anonymous data sets for these purposes.
- We may review and enforce your compliance with our policy terms, website terms or other terms relevant to our relationship with you, or deal with related enquiries.



- We may use your Personal Data in order to comply with our legal and regulatory obligations (including those imposed by the Financial Conduct Authority, or to protect and enforce our legal rights and those of other individuals.

## **2.6. Children's data**

We do not intentionally offer insurance policies to or collect any personal information from children under 18 years of age. We shall seek to cancel a policy, refund the premium or payment and delete the details of such individuals when a parent or guardian notifies us that any personal details have been obtained from their child in this context.

## **3. Sharing your information and our relationship with other parties**

### **3.1 Providers of services to you**

We may share your Personal Data with providers of services to settle claims, including the provision of emergency assistance services, under your insurance policy. These include, for example, providers who provide medical facilities and emergency medical support, including emergency medical transportation. We will share details such as your name, address or location, medical condition, details of travelling companions and next of kin, and other details and circumstances of the relevant incident. These details may include Sensitive Data relevant to the service they are providing, such as the health and vulnerabilities of individuals involved in a relevant incident. We remain responsible for how our providers use your Personal Data for these purposes.

### **3.2 Business partners**

Information about your claims and other correspondence with you may be disclosed to our business partners from whom you purchased a policy (see section 2.2 above) for their audit purposes.

### **3.3 Third party claims handlers**

Third party organizations may handle claims under some of our insurance policies. Where this is relevant, further detail can be found in your policy documentation. They will obtain information about you and your policy directly from our business partner who sold you the policy (see section 2.2 above). These organizations will act as Data Co-controller, meaning that they will decide how they use your Personal Data in handling a claim and what additional information they may need from you, in accordance with their own data protection practices. We will not generally have access to the Personal Data they record, other than for audit purposes.

### **3.4 Other companies in the worldwide AXA group**

We may share some of your Personal Data with other companies within the worldwide AXA Group who assist us with certain services, including telephone sales of our insurance products, overnight claims handling, call recordings and sanctions checking. These group entities will act on our behalf, and we remain responsible for how they use your Personal Data for these purposes. When a transfer out of the European Economic Area and Switzerland is involved, we will ensure appropriate measures are put in place to safeguard your data.



We may also share your details with other companies within the worldwide AXA Group for the purposes of claims cost management, product improvement, personalization of product offerings and for the prevention and detection of fraud. We may also use the Personal Data for statistical purposes. Those companies will not be able to identify any individual user from the information we provide them.

Such transfers within the worldwide AXA Group shall be covered by the AXA Group's BCR (Binding Corporate Rules).

### **3.5 Other disclosures**

We may also disclose your Personal Data to the following parties:

- Legal authorities or regulatory bodies;
- Parties involved with current or prospective legal proceedings, or assisting us to establish, exercise or defend our legal rights. For example, we may share information with our legal or other professional advisers.
- Parties with whom you have given us permission to speak about your insurance policy or claim (including other relevant individuals under a policy).
- Other service providers, for example those providing data backup or technology services.
- Other parties to the extent that you have consented to us doing so or where we are otherwise required or permitted to do so by law.

## **4. Legal basis for use of your information**

We collect, use and disclose your Personal Data for the following reasons:

- Collection and use of Personal Data which is necessary for performance of our contract of insurance with you, for example in order to administer a policy, handle claims and provide relevant assistance services.
- Collection and use of the Personal Data is necessary for performance of your contract of insurance with another company, to enable us to provide assistance or services and/or pay claims to you, where these are benefits processed and serviced by us.
- Collection and use of Personal Data which is in our legitimate interests, for example to manage our business, handle claims, provide services, respond to enquiries, maintain records of communications, handle complaints, enforce compliance with our terms and investigate fraud.
- Collection, use and disclosure of Personal Data to conduct sanctions checking.
- Disclosure of data in the legitimate interests of the third party who receives it, for example our business partners who audit us or third parties who handle claims under our insurance policies.
- Collection, use or disclosure of data to comply with a legal obligation, for example where our regulator or law enforcement authorities require us to do so.

Where we collect or record sensitive personal data, such as information about your health, we will separately seek your explicit consent to its use, generally at the time you make a claim, unless our use of that data is necessary in the vital interests of you or another individual or for the establishment, exercise or defense of legal claims, including claims made under the policy.



## **5. International general Personal Data transfers**

In cases where we could be led to transfer your data to a location outside the UK and the European Economic Area we will ensure your data is given a similar level of protection as required under UK data protection law.

Any sensitive personal data shall not be transferred outside European Economic Area without you being informed prior to the transfer.

## **6. Retaining your information**

Your Personal Data shall be retained as long as needed for the authorized purposes listed in any consent form you have signed, including the relevant purposes specified above. This includes retention of some Personal Data following the end of our relationship with you, especially in order to resolve any potential disputes and for ongoing or prospective legal proceedings, maintain records of our services, and otherwise comply with our legal obligations and defend our legal rights.

We undertake to keep your Personal Data safe, confidential, accurate and efficient for the usage duration period hereby authorized.

At the end of the retention period, your Personal Data will be anonymized or destroyed.

Please use the contact details at section 9 below if you need further information about our retention periods.

## **7. Security of your information**

We regularly review the technical and organisational security measures we have in place on our information and communications systems in order to prevent the loss, misuse or unauthorised alteration of your personal information.

Communications sent over our website, or using email or social media, rely on the internet which is a publicly hosted network.

AXA Travel Insurance Limited and Inter Partner Assistance S.A., both part of the AXA Partners Group have deployed an adequate procedure to identify and communicate any incident of data breach within a period of 72 hours and to resolve it within a reasonable delay.

Further information about security measures we apply to communications sent by email or over our website is available on request – please use the contact details at section 9 below.

You are responsible for keeping the password you use for accessing our website confidential. We will not ask you for your password, except when you log in to our website.

## **8. Your legal rights**

In accordance with data protection laws, you have a right to:

- Obtain a copy of the Personal Data we hold about you, together with other information about how we process it;



- Request rectification of inaccurate data, and, in some circumstances, to request us to erase or restrict our use of your data, or otherwise to object to our processing of your data for reasons relating to your particular situation;
- Oppose to a processing on your Personal Data;
- Request modification of your Personal Data;
- Request erasure of your Personal Data;
- Receive a copy or have a copy transmitted to another company (portability of data) (in a machine-readable format) of Personal Data which you have provided to us, where we process it electronically based on your consent or that it is necessary for performance of our contract with you (see section 4 above). Such data may be transmitted to another Data Controller (such as another insurance provider);
- Make a complaint about how we handle your data to the Information Commissioner's Office. Please visit [ico.org.uk](http://ico.org.uk) for further information about how to do this.
- Withdraw any consent which you have given relating to use of your data, at any time. Note that there are certain limitations and exemptions to these rights which we may apply depending on the circumstances.

Please use the contact details under section 9 below to send us requests to exercise these rights (specifying what you are requesting), or if you would like further information about them.

## 9. Our contact details

Data Protection Officer

Address:

Data Protection Officer  
AXA Travel Insurance  
106-108 Station Road  
Redhill  
RH1 1PR

Email: [dataprotectionenquiries@axa-assistance.co.uk](mailto:dataprotectionenquiries@axa-assistance.co.uk)