

PRIVACY POLICY

Information we collect

Your privacy is important to us and we are committed to respect and protect your privacy and your personal information. This privacy policy tells you what you can expect us to do with personal information we hold on you, what kinds of information we hold, how we receive it and who we receive it from. It explains who else we may share your information with, and gives you details about your data rights and how you may use them. It also describes how we comply with relevant legislation including the Data Protection Act 2018 and the UK General Data Protection Regulation.

This privacy policy is updated from time to time, to reflect any changes in how we use and handle personal information. This privacy policy was last updated December 2021.

Who does this privacy policy relate to?

This privacy policy relates to the following types of individuals, where we hold your personal information:

- Individuals who are customers, including prospective customers who have received an insurance quotation, former customers who have previously held an insurance policy with us, and customer representatives, for example those with power of attorney.
- Visitors to our websites.
- Individuals who contact us with a query, concern or complaint.
- Individuals named on our insurance policies, such as travellers.
- Individuals who request information from us or permit us to contact them for marketing purposes.

There are types of individuals who this privacy policy does not relate to, for example employees and sub-contractors (including prospective and former employees and sub-contractors), employees of our current, former or prospective business partners and service suppliers, and members of the press.

If you are one of these individuals and would like further information on how we collect, use and store your data, please contact our data protection officer at: DPO@insureandgo.com

Who we are?

Co-op Travel Insurance is arranged by AllClear Limited, a travel insurance intermediary specialising in providing tailored travel insurance for travellers with pre-existing medical conditions.

Co-op Travel Insurance is administered by Insure and Go Insurance Services Ltd. AllClear Limited and Insure and Go Insurance Services Ltd are classed as Data Controllers which means they are responsible for deciding how your personal data will be processed.

(NB: Use of the terms 'we', 'us' and 'our' throughout this document relate to AllClear Limited and Insure and Go Insurance Services).

What information we collect and how we use it

We collect your information and use it in different ways depending on your relationship with us and how you have interacted with us. This can include information we share with or receive from other third parties.

We use your information for the following lawful reasons:

To enter into or perform a contract: for example, to provide a travel insurance quotation, to arrange and administer your insurance including making any changes, renewing your policy, cancelling your policy answering queries and to action your requests.

This information may also include sensitive (special category) data such as your medical history and conditions which we can collect on grounds of substantial public interests to provide you with a quotation and/or arrange your insurance. If you give us information about another person in doing so you are confirming that you have their permission to do so and that we may use their personal data in the same way as we will use yours. All the above applies whether you are providing your information via our call centre, our website or via the online self-serve members area.

To comply with a legal obligation: for example, the rules set by our regulators the Financial Conduct Authority (FCA), The Gibraltar Financial Services Commission (GFSC) and also The Financial Ombudsman Service, to fulfil your data rights under data privacy laws, handle complaints about data privacy or our insurance products and services and to comply with other legal requirements.

For yours and our legitimate interests: for example to detect and prevent fraud, money laundering and other financial crimes, monitor and improve our business and our products and services, demonstrate compliance with applicable laws and regulations, handle legal claims, respond to other types of complaint not previously mentioned.

Where we rely on this lawful reason, we assess our business needs to ensure they are proportionate and do not affect your rights. In some instances, you also have the right to object to this kind of use. For more information, visit the "Your data rights" section of this policy.

With your consent: for example, when you ask us to provide you with information.

To protect vital interests: in extreme or unusual circumstances, we may need to use your information to protect your life or the lives of others.

When we collect your personal data

We collect personal data from you when:

- You request an insurance quotation from us, either directly through our call centre or website or via one of our third party partners.
- When you are named on the insurance policy of another individual, for example as a traveller on another individual's policy.
- You purchase, change or cancel an insurance policy.
- You renew your insurance policy.
- You contact us to request information or to make a complaint.
- You visit our websites.
- You visit the online self-serve members area to update your details or make changes to your policy.
- You take part in a competition, prize draw or survey.
- You have given permission to other companies to share your information with us.
- You have made your information publicly available, and we have a legitimate reason to review it.

We also collect your information from other third-party sources where we have legal grounds to do so. These include anti-fraud and crime-prevention agencies, credit reference and vetting agencies, and other data providers.

What Information we use and hold about you

Depending on your relationship with us, we may hold the following types of information about you:

- Identity and contact data: for example, your name, date of birth, postal address, telephone number and e-mail address.
- Payment and account data: for example, your bank account details, credit/debit card details.
- Correspondence data: for example, copies of letters and e-mails we send you or you send to us, and notes or call recordings of any telephone conversations.
- Internet data: for example, information collected by cookies and other online technologies such as Facebook pixels and Google Analytics, as you use our website or contact us by online methods.
- Information we obtain from other sources: including credit agencies, anti-fraud and other financial crime prevention agencies and other data providers. This can include demographic data and interest-based data.
- Complaint data: for example, what the complaint was, how we investigated it and how we resolved it, including any contact with the Financial Ombudsman Service or other third party adjudicator services.
- Information disclosed to the insurers of the policy and their assistance and claims handlers.

Some of our processes combine different sets of information we hold. This can include combining different data sets we have about you or combining your information with that of other individuals.

Automated Decision Making and Profiling

Our online Quote and Buy systems carry out automated decision making and profiling to decide whether we can provide insurance to you and at what price. If you do not want your data to be processed in this manner then you are able to obtain quotations and arrange insurance via our Contact Centre.

Use of Cookies (website only)

Information is automatically collected whilst navigating through and interacting with the content on our site as well as information on your device or computer (such as cookies) and this includes social media features which may collect your IP address and which page you are visiting and may set a cookie to enable the feature to function correctly. For further information on cookies and third parties that we use to host these services please read our [cookie policy](#).

The sole purpose of passively collecting your information is to improve your experience when using our websites and services.

Who we share your data with

Where applicable, we share your personal information with the following types of third parties when we have a valid reason to do so:

- Insurers, underwriters and other companies for the purpose of arranging and administering your insurance, providing healthcare services and for handling claims.
- Co-op Insurance Service Limited (CISL), who promotes Co-op branded Insurance Products and is also a Data Controller in relation to these activities.
- Law enforcement, government bodies, regulatory organisations, courts and public authorities, for example the Financial Conduct Authority (FCA), The Gibraltar Financial Services Commission (GFSC), The Financial Ombudsman Service, The Information Commissioner's Office (ICO), Police and HMRC.
- Your broker/intermediary where you purchased the policy through them.
- Personal representatives appointed by you to act on your behalf.
- If you use our webchat service then we will share your information with our Service Provider Live Chat for the purposes of helping you with your query.
- A third party where disclosure is required to comply with legal or regulatory requirements.
- A third party we may choose to sell, transfer, or merge parts of our business or our assets with. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this policy.
- Other companies within the AllClear Group.

Other third parties

Other third parties including claims handling and assistance service providers may share personal information that you have disclosed to them, with us for the purposes of administering your policy. If you refuse disclosure of data to a third party which prevents the insurer from providing cover, the insurer may be released from any liability for any claim.

We use a variety of services hosted by third parties such as HotJar, Google Analytics, Bing Ads, Google Tag Manager, Live Chat, TrustPilot, YouTube and Optimizely. These services may collect information sent by your browser as part of a web page request, such as cookies or your IP address.

For information on how these third parties collect and use your information, please refer to their privacy policies.

Transferring data internationally

Data protection law places restrictions on transferring personal data outside of the United Kingdom (UK) and the European Economic Area (EEA). The EEA consists of the member countries of the European Union (EU), along with Iceland, Liechtenstein, Norway and Switzerland, and who are all considered to have appropriate data protection laws to safeguard your privacy and protect your rights.

We may need to transfer information to our service suppliers in countries outside the UK and the EEA. If we do, we will ensure that your information is properly protected. If the laws of the country where our supplier is based are not considered equivalent to those in the UK or the EEA, we will ensure that the service supplier enters into a formal legal agreement that reflects the standards required.

Marketing

We do not actively market our products and services to you. Co-op Insurance Service Limited (CISL) promotes Co-op branded Insurance Products and is also a Data Controller in relation to these activities. Further details of how CISL use your personal data can be found here: coop.co.uk/insurance/about-us/privacy-and-cookies.

Your data rights

Data protection law gives you rights relating to your personal information. This section gives you an overview of these and how they relate to the information you give us.

The UK supervisory authority for data rights, the Information Commissioner's Office (ICO), has also published detailed information about your rights on their website: www.ico.org.uk.

Your right to access

You have a right to request copies of the personal information we hold on you, along with meaningful information on how it is used and who we share it with.

This right always applies, but there are some instances where we may not be able to provide you with all the information we hold. If this is the case, we will confirm why we are unable to provide it - unless there is a valid legal reason that means we cannot let you know why.

Your right to rectification

If information we hold is inaccurate or incomplete, and this has an impact on the way we are using your data, you have the right to have any inaccuracies corrected and for any incomplete data to be completed.

If you ask us to rectify your information, we will either confirm to you that this has been done, or if there is a valid reason that this cannot be done, we will let you know why.

Your right to erasure (the right to “be forgotten”)

You have the right to request that your personal information is erased.

If you ask us to erase your information, we will either confirm to you that this has been done, or if we are unable to delete it, let you know why and also inform you how long we will hold it for. For more information, see the “Retention Policy” section of this policy.

Your right to restrict processing

You can ask us to restrict the use of your information.

If you ask us to restrict your information, we will either confirm to you that this has been done, or if we are unable to restrict it, we will inform you why.

Your right to object to automated decision-making

You can object to decisions made about you using your information and undertaken by purely automated means.

If you do so, we will arrange for someone to assess the automated decision and confirm the outcome of this assessment to you.

Your right to object to processing

You may object to our processing of your personal data pursuant to this privacy policy. Please contact us providing details of your objection.

Your right to object to the use of your information for statistical purposes

You can object to us using your information for statistical purposes in some instances.

If you do so, we will either confirm to you that the processing has stopped, or there is a valid reason for the processing to continue, we will inform you why.

Your right to challenge our legitimate interests

You can challenge the use of your personal data where we use a legitimate business interest as a lawful basis to process your information. You can find more information on when we use this lawful basis in the “lawful ways we use your data” section of this policy.

If you do so, we will either confirm to you that the processing has stopped, or there is a valid reason for the processing to continue, we will inform you why.

Your right to data portability

You have the right to request that your information be compiled into a common, machine readable format and either provided directly to you or sent by us to a third-party you nominate.

If you request this, we will either act upon your instruction and confirm to you that we have done so, or if there is a valid reason that this cannot be done, we will tell you why.

Your right to complain

If you have a complaint about how we use your personal information, please contact us by email at complaints@travelinsurance.co-op.com or by post:

The Customer Relations Manager
Co-op Travel Insurance
Maitland House
Warrior Square
Southend-on-Sea
Essex
SS1 2JY

If you remain unhappy with our response you may raise a complaint with a supervisory authority responsible for data protection and privacy.

In the UK, the supervisory authority is the Information Commissioner's Office (ICO), who can be contacted using the following details:

By email: casework@ico.org.uk

By telephone: 0303 123 1113

By post: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Exercising your data rights

You can exercise any of your data rights by contacting our Data Protection Officer at DPO@insureandgo.com

Retention Policy

We will only retain data for as long is necessary for the purposes for which it is being processed and in line with our data retention policy. In most cases this will be a maximum of 7 years from the expiry of an insurance contract.

Linked websites and information security

We are committed to protecting the online privacy of visitors to our website. We have implemented security policies, rules and technical measures to protect your personal data from unauthorised access; improper use or disclosure; unauthorised modification; and unlawful destruction or accidental loss.

Our web site may contain links to other websites. We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites we provide links to from our website. Linked websites are subject to their own policies. You should read any linked website Privacy Policy before submitting any personal information to them.

Email security

If you contact us by email you should be aware that emails are not secure unless they have been encrypted. We cannot accept any responsibility for the unauthorised access to your data that is beyond our control.