
Data Protection

This Privacy Policy tells you what data we collect, why we collect it and what we do with it.

H3 are committed to ensuring your privacy and personal information is protected. The document that referred you to this notice (for example, your insurance policy) shall set out details of Insure I Ltd that is processing your personal information; it is the data controller of your personal information and is responsible for complying with data protection laws. For the purposes of this Privacy Policy, references to **“we”** or **“us”** shall refer to H3 Insurance Ltd.

This Privacy Policy should be brought to the attention of any party who is included in your Policy including spouse, dependent or employee details, where they have given you consent to act on their behalf.

By providing your personal information or the personal information of someone included in your policy, you acknowledge that we may use it only in the ways set out in this Privacy Policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

From time to time we may need to make changes to this privacy policy, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. This will be updated on our website from time to time: **www.h3insurance.com**.

Our Privacy Principles

When we collect and use your personal information, we ensure we look after it properly and use it in accordance with our privacy principles set out below, keep it safe and will never sell it.

Our Privacy Principles

1. Personal information you provide is processed fairly, lawfully and in a transparent manner.
2. Personal information you provide is collected for a specific purpose and is not processed in a way which is incompatible with the purpose which H3 collected it.
3. Your personal information is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. Your personal information is kept accurate and, where necessary kept up to date.
5. Your personal information is kept no longer than is necessary for the purposes for which the personal information is processed.
6. We will take appropriate steps to keep your personal information secure.
7. Your personal information is processed in accordance with your rights.
8. We will only transfer your personal information to another country or an international organisation outside the European Economic Area where we have taken the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards.
9. H3 do not sell your personal information and we also do not permit the selling of customer data by any companies who provide a service to us.

How do we collect your personal information?

There are several ways in which we collect your personal information, the two main ways we might collect personal information about you are from things you tell us yourself, and from things we ask other people or organisations to share with us. Things you tell us could include conversations we have on the phone or what you've written on an application form. We might also collect information about you from other people and organisations, such as medical professionals, or by checking databases, such as the electoral register. Please see below for a list of ways we collect your personal information:

We collect personal information directly from you:

- via enquiry, application and claim forms;
- via feedback forms;
- when you purchase any of our products or services;
- through quotations for cover and application forms;
- via cookies. You can find out more about this in our cookies policy on our website;
- via our telephone calls with you, which may be recorded;
- when you provide your details to us either online or offline;

We also collect your personal information from several different sources including:

- directly from an individual who has a policy with us under which you are insured, for example you are included on your partner's health insurance policy;
- Your employer, if you are covered by an insurance policy your employer has taken out

- Brokers and other agents (this may be your broker if you have one, or your employer's broker if they have one)
- from social media where fraud is suspected; and
- via third parties including:
 - your family members where you may be incapacitated or unable to provide information relevant to your policy;
 - medical professionals and hospitals;
 - aggregators;
 - third parties who assist us in checking that we are permitted to make claims payments; and
 - third parties such as companies who provide consumer classification for marketing purposes e.g. market segmentation data

What personal information do we collect?

We might collect personal information, such as your contact details, information about your bank or credit cards. If you are interested in obtaining medical insurance, we may ask you about you or your families' medical history. Please note, in certain circumstances we may request and/or receive "sensitive" personal information about you. For example, we may need access to health records for the purposes of providing you with a policy or processing claims, or details of any court or HMRC judgments for the purposes of preventing, detecting and investigating fraud. Please see below for a more detailed list of personal information we collect.

The information that we collect will depend on our relationship with you. Where other people are named on your policy, we may ask you to provide the information below in relation to those people too, if this is relevant to your insurance.

Where H3 is the data controller of your personal information we may collect the following about you:

- Personal information
 - contact details such as name, email address, postal address and telephone number
 - details of any other persons included on the policy where they are named on your policy and the relationship to you as policyholder
 - social circumstances, for example; number of dependents
 - identification information such as your date of birth
 - Information about your employment
 - financial information such as bank details, credit card details
- information obtained through our use of cookies. You can find out more about this in our cookies policy
- information relevant to your claim or your involvement in the matter giving rise to a claim
- details of bankruptcies and other financial sanctions such as HMRC investigations
- your marketing preferences
- Sensitive personal information
 - details of your current or former physical or mental health
 - details concerning marital status
 - details regarding criminal offences, including alleged offences, criminal proceedings, outcomes and sentences (previous criminal convictions, bankruptcies and other financial sanctions such as County Court Judgements)

How do we use your personal information?

We mainly use your personal information to provide you with an insurance policy or benefits and to provide you with the right services based on your situation. So, if you have a problem, we make sure the right network of providers and specialists are in place and we can also update you quickly on the progress and cost of your claim and keep you safe from fraud.

However, there are several other reasons why we use your personal information; please see below for a more detailed list of how we use your personal information.

We may process your personal information for several different purposes and these are set out in more detail in the below sub-sections. Under data protection laws we need a reason to use and process your personal information and this is called a legal ground. We have set out below the main reasons why we process your personal information and the applicable circumstances when we will do so. When the personal information we process about you is classed as sensitive personal information (now known as 'Special Categories') (such as details about your health, sexual orientation or criminal offences) we must have an additional legal ground for such processing, or where appropriate, we apply a specific exemption for Insurance purposes.

- Processing is necessary for us to provide your insurance policy and services, such as assessing your application and setting you up as a policyholder, administering and managing your insurance policy, providing all related services, providing a quotation, handling and paying claims

and communicating with you. In these circumstances, if you do not provide such information, we will be unable to offer you a policy or process your claim.

- Where we have a legal or regulatory obligation to use such personal information, for example, when our regulators, the Financial Conduct Authority (FCA) and our data protection regulator, the Information Commissioner's Office (ICO) wish us to maintain certain records of any dealings with you.
- Where we need to use your personal information to establish, exercise or defend our legal rights, for example when we are faced with any legal claims or where we want to pursue any legal claims ourselves.
- Where we need to use your personal information for reasons of substantial public interest, such as investigating fraudulent claims and carrying out fraud, credit and anti-money laundering checks.

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- Where we have a specific legal exemption to process sensitive personal data for insurance purposes. This exemption applies where we need to process your information as an essential part of the insurance cover, for example health data.
 - Where you have provided your consent to our use of your personal information. We will usually only ask for your consent in relation to processing your sensitive personal information (such as health data) or when providing marketing information to you (including information about other products and services). This will be made clear when you provide your personal information. If we ask for your consent we will explain why it is necessary. Without your consent in some circumstances, we may not be able to provide you with cover under the policy or handle claims or you may not be able to benefit from some of our services. Where you provide sensitive personal information about a third party we will ask you to confirm that the third party has provided his or her consent for you to act of their behalf.
 - Where we have appropriate legitimate business need to use your personal information such as maintaining our business records, developing and improving our products and services, all whilst ensuring that such business need does not interfere with your rights and freedoms and does not cause you any harm.
 - Where we need to use your sensitive personal information such as health data because it is necessary for your vital interests, this being a life or death matter.

You will find details of the legal grounds we rely on for each use of your personal information below.

Why we need your personal information

To review your insurance application and provide you with a quote.

To administer, provide and service your insurance policy, assess eligibility for and handling and paying claims.

To communicate with you and resolve any complaints you may have

To evaluate your application ability to pay for your policy by instalments.

To prevent, detect and investigate fraud.

For the purposes of debt recovery (where you have not paid for your insurance policy).

For our own management information purposes including; managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice). We also undertake measures to secure our system and to ensure the effective operation of our systems.

For analytical purposes and to improve our products and services.

Complying with our legal or regulatory obligations

Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers).

Providing marketing information to you (including information about other products and services and undertaking customer surveys) in accordance with preferences you have expressed.

Personal information we may process for the purpose adjacent shall include, but shall not be limited, to the types of information set out below

Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees). Sensitive personal information about your health or family members' health.

Your contact details and any information relevant to your policy.

Your contact details and bank account details

Information about you, your name, address, email address and contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees). Sensitive personal information about your health or family members' health

Information about you, your name, address, email address, contact details and bank account details

Information about you, your name, address, email address and contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees). Sensitive personal information about your health or family members' health.

Details about you, other related parties, your product, service or benefit, depending on the nature of the obligation.

Details about you and other related parties, your product or service having been discussed with you or your representative during a telephone conversation with us.

Your name, contact details, marketing preference

Legal Grounds for Processing

Legal ground: such use is necessary to provide your insurance policy.

Legal ground for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes or you have provided your consent. Please note that, in some cases, if you do not provide your consent, we may not be able to provide your insurance policy.

Legal grounds: such use is necessary to provide your insurance policy and we have a legitimate business need to use your personal information to administer your insurance policy and handle any claims. Legal grounds for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes or you have provided your consent (please note that if you do not provide your consent, in some cases, we may not be able to administer your policy or pay claims) and/or it is in your vital interests.

Legal grounds: such use is necessary to provide your insurance policy and we have a legitimate business need to resolve any complaints. Legal grounds for sensitive personal information: such use is necessary for the purposes of establishing, exercising or defending our legal rights and/or you have provided your consent.

Legal grounds: such use is necessary to provide your insurance policy and we have a legitimate business need to prevent fraud. Legal ground for sensitive personal information: we need to use your personal information for reasons of substantial public interest to prevent and detect fraud.

Legal ground: we have a legitimate business need to recover any debt.

Legal grounds for sensitive personal information: such use is necessary for the purposes of establishing, exercising or defending our legal rights.

Legal ground: we have a legitimate business need to use your personal information to understand our business and monitor performance and maintain appropriate records, to protect the security of our systems.

Legal ground for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes or you have provided your consent.

Legal ground: we have a legitimate business need to use your personal information for services improvement.

Legal ground for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes or you have provided your consent.

Legal ground: such use is necessary for us to comply with our legal or regulatory obligations.

Legal ground for sensitive personal information: Where appropriate we apply an exemption for Insurance purposes or you have provided your consent; or we are responding to a call and acting in the vital interests of a person.

Legal ground: we have your consent.

How does Insure I Ltd use your information for Management Information purposes?

We use your personal information to help us understand our business and monitor our performance, for example, to help determine how much insurance premiums should be.

If you are a member of a group scheme, we may provide reports to your employer, or a parent company on the performance of the scheme and on the health of the workforce. The information we provide is anonymised which means you cannot be identified from the information.

We also look to see where there might be trends in geographical areas to determine where there is a high or even low tendency to claim to ensure we offer the best price or even a different type of service.

How does Insure I Ltd use your information for analytical purposes and to improve our products and services?

We may use your personal information for research and statistical analysis including general research into health-related areas and research about the products and services we provide. Where possible, we will anonymise such information. However, sometimes we may need to use your health information to do this and where we do, we will obtain your consent beforehand.

By analysing the information you provide we can tailor and improve our products to better suit our customer's needs. Please note we will only ever

market to you if you provide your explicit consent.

How does Insure I Ltd use your information to administer your insurance policy and assess your eligibility for and the handling and paying of claims?

We use your personal information for the ongoing management of any claims you have, and paying your medical bills. We will sometimes need to clarify information with your doctor or hospital, such as what treatment you have received if a bill is unclear.

Sometimes it will be necessary for our clinical team to discuss your treatment with your doctor, without first getting your consent. Typically, this will happen if you have been unexpectedly admitted to hospital and we are unable to contact you or you are not able to give your consent.

How does Insure I use your personal information to prevent, detect and investigate fraud?

To help keep premiums and costs down we work with other insurers, healthcare providers including the NHS, anti-fraud bodies and law enforcement agencies to protect ourselves, the NHS and our policyholders from fraudulent behaviour and medical malpractice. This may mean disclosing personal information, including health information, to these bodies. In some cases. We are obliged to report suspicions of medical malpractice to the relevant regulatory body such as the General Medical Council.

We also monitor the services you are being provided by healthcare providers for these purposes and to ensure accurate billing. In some cases, we are required by law to report crime and suspected crime and other matters to law enforcement and government agencies.

Who do we share your personal information with?

We might share your personal information with two types of organisation – companies inside the Insure I Group, and other third parties outside the Group. For further details of disclosures, please see below. We won't share any of your personal information other than for the purposes described in this Privacy Policy. If we share anything outside the Group, it'll be kept strictly confidential and will only be used for reasons that we've described.

Who might we disclose your personal information to?

Disclosures within our group

To provide our services your personal information is shared with other companies including, but not limited to, our panel of underwriters. Your personal information might be shared for our general business administration, efficiency and accuracy purposes.

Disclosures to third parties

We also disclose your information to the third parties listed below for the purposes described in this Privacy Policy. This might include:

- Your relatives, guardians (on your behalf where you are incapacitated or unable) or other people or organisations connected to you such as your insurance broker, your patients (if you are a healthcare practitioner or your lawyer).
- Your current, past or prospective employers.
- Your medical social and welfare advisers, or practitioners.
- Our insurance partners such as brokers, other insurers, reinsurers or other companies who act as insurance distributors.
- Our third-party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies and finance providers.
- Our suppliers and providers of goods or services that we make available to you.
- Financial organisations and advisers.
- Central and local Government (for example if they are investigating fraud or because we need to contact them regarding international sanctions)
- The Financial Ombudsman Service and regulatory authorities such as the Financial Conduct Authority and the Information Commissioner's Office.
- Other insurance companies, NHS fraud teams, the General Medical Council, the police, National crime agency, other law enforcement agencies and organisations that maintain anti-fraud or other crime databases where reasonably necessary for the prevention or detection of crime.
- Selected third parties in connection with the sale, transfer or disposal of our business

Disclosure of your personal information to a third party outside of Insure I will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

circumstances where we are required to transfer your personal information outside of the EEA and we shall rely on the basis of processing it for being 'necessary for the performance of your contract.

We may also disclose your personal information to other third parties where:

- we are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or Prudential Regulatory Authority / Financial Conduct Authority or Information Commissioners Office request;

or

- we believe that such disclosure is necessary to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

Some of the recipients set out above may be in countries outside of the EEA.

Where we make a transfer of your personal information outside of the EEA we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards.

Occasionally there may also be some

How long do we keep records for?

In most cases, we only keep your information for as long as the regulations say we have to. This is usually between three and ten years after our relationship with you ends but it will vary depending on what data we hold, why we hold it and what we're obliged to do by the regulator or the law.

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and to comply with our legal and regulatory obligations. The time we retain your personal information for will differ depending on the nature of the personal information and what we do with it. How long we keep personal information is primarily determined by our regulatory obligations. We typically keep quotation information for 3 years, and policy and claims records for up to 10 years from the end of our relationship with you. In some cases, such as if there is a dispute or a legal action we may be required to keep personal information for longer.

Please note that we may retain any data provided to us on our websites for a limited period, even if you do not complete your quotation. The information may be used to enquire as to why you did not complete your quote or for us to better understand your needs but only if you have agreed for us to contact you.

Your Rights

You can ask us to do various things with your personal information. For example, at any time you can ask us for a copy of your personal information, ask us to correct mistakes, change the way we use your information, or even delete it. We'll either do what you've asked or explain why we can't - usually because of a legal or regulatory issue. For further details about your rights please see below.

You have the following rights in relation to our use of your personal information.

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. There will not usually be a charge for dealing with these requests. Your personal information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case, please contact us by using the details shown in your documentation and you can ask us to update or amend it.

The right to erasure:

In certain circumstances, you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original

purpose or where you withdraw your consent. However, this will need to be balanced against other factors, for example according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.

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 process your personal information.

Right to data portability:

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.

Right to object to direct marketing:

You can ask us to stop sending you marketing messages at any time. Please see the Marketing section for more information.

Right not to be subject to automated-decision making:

Some of our decisions are made automatically by inputting your personal information into a system or computer and the decision is calculated using certain automatic processes rather than our employees making those decisions. We make automated decisions in the following situations:

- **Deciding your premium**

We use the personal information that you and others provide to us about you your family, where you live your policy claims history, and other non-personal information such as hospital costs to determine your premium and eligibility. The price also depends on what options you have chosen to purchase. For example, if you live in London you will pay more than if you live in Belfast because healthcare costs, on average, are higher in London than Belfast. We also use information about how long you have been a customer, how many claims you have made and how much you pay in premiums to determine what terms you are offered at renewal.

- **Fraud prevention**

Insure I check against lists of people known to have undertaken fraudulent transactions and will reject those applicants on the basis they are likely to defraud the company.

- **Assessing your application**

We may use scoring methods to assess your application and to verify your identity, for example; When you join H3 you will either do so on a personal policy or under a group scheme. We may collect information

directly from you, from/via your or your partner, your parent's or employer. Depending on the type of scheme we may collect health information at the start, as well as personal information such as your date of birth and address. Depending on the type of scheme/policy H3 may use the personal and sensitive information to assess the price and determine any exclusions we need to apply.

Examples of information used by our systems to do this include: your age, your postcode your lifestyle and your medical history. If you do not consent to us processing sensitive information in this way, we may be unable to assess your application or offer you cover.

The right to withdraw consent:

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. Please note in some cases we may not be able to process your insurance if you withdraw your consent.

The right to lodge a complaint

You have a right to complain to the ICO at any time if you object to the way in which we use your personal information. More information can be found on the Information Commissioner's Office website: <https://ico.org.uk/>

You can make any of the requests set out above using the contact details provided to you in your policy documentation. Please note that in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

In some circumstances exercising some of these rights will mean we are unable to continue providing you with cover under your insurance policy and may therefore result in the cancellation of the policy. You will therefore lose the right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before you exercised your right, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

Marketing

You're in control of how we use your information for marketing. We will only contact you if you've agreed it's okay. Then, we might use your information to tell you about products and services that could interest you.

We may inform you of other products and services that may be of interest to you or members of your family, but we will only do this where you have provided your consent. You can always change your mind by contacting us using the details shown in your documentation and telling us you no longer wish to be contacted.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to unsubscribe from emails sent by us, you may do so at any time by following the unsubscribe instructions that appear in all emails. Otherwise you can always contact us using the details set out in your documentation to update your contact preferences. In such circumstances, we will continue to send you service related (non-marketing) communications where necessary.

We would like to keep you informed, from time to time about relevant products and services. We may do this by mail, email, telephone or other electronic methods such as text message.

From time to time we may run specific marketing campaigns through social media and digital advertising that you may see which are based on general demographics and interests. Individual personal information is not used for these campaigns. If you do not want to see any campaigns then you will need to adjust your preferences within social media settings and your cookie browser settings.

We will also share information that we collect about you for marketing within the 3fivetwo Group, if you give us permission to do so. If you change your mind you can let us know by adjusting your choice.

Contact Details of the Data Protection Officer

You can ask us to do various things with your personal information. For example, at any time you can ask us for a copy of your personal information, ask us to correct mistakes, change the way we use your information, or even delete it. We'll either do what you've asked or explain why we can't - usually because of a legal or regulatory issue. For further details about your rights please see below.

If you wish to contact the Data Protection Officer the details are below:

For H3 Health Insurance.

The Data Protection Officer:
H3 Health Insurance
Unit 1
21 Old Channel Road
Belfast
Co Antrim
BT3 9DE

If you would like to contact the UK's Information Commissioner's Officer direct; please write to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Telephone: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number <https://ico.org.uk/global/contact-us/email/>