



Privacy & Cookies Policy

This explains how we collect, use and store your personal information. This includes any personal information given to us about other people who are named on the policy, quote or claim.

If you would like a copy, please contact us at info@coeconnections.co.uk

We want you to be confident about how we use your personal information. As a regulated company and information controller we take the responsibilities for the security and management of your personal information seriously. That's why we invest in our systems and processes to ensure that the way we collect, use, share, and store your information meets both the regulatory and our own high standards.

Who we are and how to contact us

COE Connections International (COE) is the controller of your personal information along with our insurers. If you have any questions about how we process your personal information or are unsure about anything please get in touch with us at: COE Connections International, 323 Maple Mews. Hayes Country Park, Burnham Road, Battlesbridge, Wickford, Essex SS11 7GS England or email us at info@coeconnections.co.uk.

Information about our organisation and website

COE Connections respects your privacy and our Privacy Policy & Cookies Statement tells you the information we or our insurers will collect online while you visit our website and what we do with it, as well as the choices you can make about the data collected. We process your information fairly and lawfully, in accordance with the Data Protection Act (1998) and the General Data Protection Regulation (GDPR) enforced on 25th May 2018.

COE Connections International is an independent travel insurance provider that provides a limited range of products. We are authorised and regulated by the Financial Conduct Authority under FCA Register number: 315199. Business address: COE Connections International, 323 Maple Mews. Hayes Country Park, Burnham Road, Battlesbridge, Wickford, Essex SS11 7GS England.

Automatically collected data

We collect the domain and IP address of each website visitor which is logged automatically. This information does not identify you as a person but only the computer you use to access the website. This information is used for statistical purposes and for analysing website usage so we can improve the service provided to you, such as the content and functionality of our website. We do not link this automatically collected information to your personal data.

Cookies

Cookies are small pieces of information temporarily stored on your computer by the server maintaining and operating the website. They do not compromise your privacy or security as they simply add a randomly generated identifying tag on your computer. The cookies we place on your computer expire at the end of your session on our website. We may save cookies on your computer to personalise your future visits to our website and to improve your browsing experience. This can also speed up the site navigation helping you to find the exact information you are looking for. If you want to stop cookies being placed on your personal computer, please refer to your Internet browser for the specific instructions. Please also see our separate cookies link.

How we use your personal information

Information we collect

We only ask for information that we need and have strict controls to keep it safe. We collect your personal information to provide our products and services (e.g. handling your claims) to you. Without the information we ask for, we can't give you a quote or insurance policy and it may affect the outcome of any claims you make. Personal information we collect will be held in digital and / or paper files. We collect personal information such as name, address, date of birth, contact numbers, health, and claims history. We'll also collect information which relates to the things you want to insure (for example your additional electronic items such as laptops). We or our insurers collect personal information about everybody named on your policy, quote, incident or claim when you:

- ask for a quote or apply for a policy
- buy and / or use a product or service
- ask us a question, make, or inform us of a claim or incident
- make a payment
- update your personal details
- change your cover
- register a complaint
- take part in market research (e.g. customer satisfaction surveys)
- update how we contact you with marketing

We do not retain any information that you enter when obtaining a quotation.

How we use and share your personal information

The personal information we ask for may be used by us and third parties who process information on our behalf. This includes organisations who administer your policy, service your claims and our insurers.

Who might we share your data with?

Circumstances where we are operationally or contractually obliged to pass on your information may be where third parties administer part, or all of the service we offer, or products we sell, for example, Claims Handling, Medical Assistance, Medical Screening, or services we require, such as marketing, IT and server maintenance, website development. Your personal data may be shared with the following categories of third parties:

- Insurers
- Claims third party administrators and/or loss adjusters (to handle and manage your claim)
- Emergency Medical Assistance providers (to handle and manage your claim)
- Medical Screening providers (to assess the insurance risk of medical conditions you have declared to us)
- Regulatory authorities/fraud prevention agencies/legal or crime prevention agencies
- Any additional parties who may communicate with us on your behalf, provided that they have your permission to do so
- Service providers and contractors, including communication services, marketing, IT contractors (website software and hardware).

Legal grounds for processing personal information

We collect your personal information to provide our quotes, products and services to you. We only retain your personal data if you purchase an insurance policy with us.

As a regulated financial services organisation we're required to comply with legal and regulatory obligations such as the prevention, detection and reporting of fraud and other financial crime.

We'll process personal information for our legitimate interests, when we have a business reason to do so, to:

- develop, improve, and personalise our products, pricing and services
- enhance our customer service, experience, and relationship (e.g. customer and market research, business analysis, provide relevant product and service information)
- improve the relevance of our advertising and marketing campaigns

- help detect and prevent fraud and financial crime
- develop and improve our administration, security systems and insurance applications
- share it with third parties in the event of organisational change (e.g. if we bought or merged with another organisation)
- share personal information with other GLI companies

If we need your consent to process personal information we'll ask for this first. You can withdraw your consent at any time. We'll ask for your consent (or next of kin's), to obtain any medical / health information we need.

Payment card details

We use a secure payment processor for all card payments. When a payment is processed we receive a unique transaction code and an extract of your card number, which we store as a record of the transaction.

We do not retain any of your full credit or debit card details electronically, nor in hard copy on our voice recording system.

Automated decision making and profiling

We use automated decision making to help determine the prices, policy terms, relevant products / services, when you research or ask for a quote, buy insurance, make any changes, renew or make a claim.

We may also profile you based on your personal information and that provided by third parties. Profiling may be used to help determine the likelihood of a claim or policy transaction being fraudulent. Profiling will also be used to enhance our understanding of you and to inform our business decisions (e.g. product design, pricing, customer journeys or marketing strategy). If you've chosen to receive marketing information from us, profiling will be used to make our marketing more relevant, e.g. personalise the channels used to market to you, the marketing messages used and the offers you're sent.

Please see the personal information rights section below.

International transfers

In the event that we process personal information outside the UK, the processing in those locations is protected by UK and European data standards. Where your claim occurs abroad we may also send data to the necessary service providers and agencies as required to service your claim.

Financial crime & fraud prevention agencies

The personal information we have collected may be shared with crime prevention agencies who will use it to prevent financial crime and fraud and to verify your identity. If financial crime or fraud is detected, you could be refused certain services. Where we suspect financial crime or fraud, we may cancel any policies you have with us, not be able to pay any claim or offer you the requested product or service. We may share relevant information with crime and fraud prevention agencies, law enforcement agencies and other relevant organisations.

Regulatory bodies and law enforcement agencies

We may share your Personal Data with other public bodies, such as regulatory and government bodies, and the police or other law enforcement agencies, or official body to whom we are legally required to do so.

Or to detect and prevent fraudulent claims and/or activities.

Identity check

In order to process your application we'll supply your personal information to sanctions checking systems and/or agencies and they'll give us information about you. We do this to check your identity, and prevent fraud and other financial crime.

We may also continue to exchange information about you on an ongoing basis, including about your settled claims. They may also share your personal information with other organisations.

Claims and Underwriting Exchange and other databases

You must tell us about any claim or accident, even if it wasn't your fault. We may share this information and your personal details with databases such as the Claims and Underwriting Exchange (CUE). We may search these databases when you apply for insurance, make a claim or renew your policy, to validate your claims history (or that of any other person or property likely to be involved in the insurance or claim).

Affinity Agents

If you get a quote or buy through one of our affinity Agents, we may pass some of your personal information back to them (e.g. policy details, claims, membership and suspected fraud and other financial crime information).

Industry databases

We or our insurers will check and exchange information with industry databases, such as:

- financial crime and fraud prevention databases (also refer to financial crime and fraud prevention agencies section)
- payment validation (e.g. checking your card is registered at your address)
- claims compensation and recovery databases (e.g. reimbursement of NHS costs resulting from an accident)

Specialist services we use

We or our insurers use other companies to provide some services, e.g. emergency medical assistance companies, claims handlers, claims adjusters, claims suppliers, legal service providers, communication services, marketing, IT contractors (website software and hardware), fraud and other financial crime investigation services etc.

They may have access to or will be given the personal information they (or their sub-contractors) need to manage their service.

Insurers and Insurance brokers

We will share any personal information, including policy, claims, medical, and suspected fraud and other financial crime information, with our insurers and insurance brokers.

Other insurers

When necessary we share your personal information with other insurers if you make a claim, to verify that the information you've provided is correct and prevent financial crime and fraud. If you move to a new insurer we may confirm certain details about your insurance to them. We'll only do this if we're sure it's a genuine request.

Other insured parties

An insured party on your policy (e.g. partner) may notify us of an incident or claim against your policy.

Giving someone permission to talk to us about your policy

We can only talk about your policy to you or someone we're satisfied that you've authorised to talk to us, on your behalf.

Communications

When you contact us, personal information that you give us will be recorded (this does not include payment details). This helps us improve our customer service, respond to complaints and prevent fraud and other financial crime. All communications will be in English.

How we protect your data

We take the security of your data very seriously. We take all reasonable measures within our control to maintain a secure environment for your personal information, ensuring that any personal information you provide us is confidential and secure. However, we are unable to guarantee that there will not be circumstances outside of our control where a third party could obtain unauthorised access to your personal information, and we shall not be liable in such instances.

How long we keep your personal information

As a general rule, we will keep your personal data for seven years following the end of your relationship with us as it is likely that we will need the information for regulatory reasons or to defend a claim. There may be exceptions where we may need to keep your personal data for longer.

We will also keep your personal data for over 7 years for statistical and analytical purposes.

Your personal information rights

You have a right in certain circumstances to:

- access the personal information we hold about you
- correct personal information
- have your personal information deleted
- restrict us processing your personal information in certain ways
- receive your personal information in a portable format, and
- object to us processing your personal information

Please visit <https://ico.org.uk/for-the-public/> for further information on the above rights.

You have the right to request a copy of all the personal information that we hold about you. To do this, simply write to: COE Connections International, Compliance Officer, 323 Maple Mews, Hayes Country Park, Burnham Road, Battlesbridge, Wickford, Essex SS11 7GS, England or email us at info@coeconnections.co.uk. We will contact you and take all reasonable steps to confirm your identity before providing you with any details of personal information we may hold about you.

You can also ask for a person to review an automated decision. If you want to find out more or to exercise these rights please contact us: COE Connections International, Compliance Officer, 323 Maple Mews, Hayes Country Park, Burnham Road, Battlesbridge, Wickford, Essex SS11 7GS England or email email us at info@coeconnections.co.uk.

Your right to make a complaint

If you have a complaint about the way we process your personal data please contact us at info@coeconnections.co.uk. You can also raise your complaint with the Information Commissioner's Office on 0303 123 1113 or visit ico.org.uk/concerns.

Changes

We or our insurers may change this information from time to time. Any changes will be updated on our website and if appropriate notified to you in writing.

Hyperlinks

COE's website may provide links to the third-party websites for your information and convenience. Following such links means you will leave COE website. COE does not control third-party websites and their privacy policies which may be different from ours. COE'S Privacy Statement does not cover any personal information you give to the third-party websites. We recommend you view the privacy policy of every website you choose to provide your personal information to.