

## **PRIVACY POLICY**

[axa-travel-insurance.com](http://axa-travel-insurance.com)

### **Protecting your personal information**

"we", "us" and "our" means Inter Partner Assistance and/or AXA Travel Insurance, 10/11 Mary Street, Dublin 1, Ireland, both regulated by the Financial Regulator. Inter Partner Assistance is a branch of Inter Partner Assistance S.A., Louise Avenue, 166 bte 1, 1050 Brussels, a Belgian company authorised by the Banking, Finance and Insurance Commission of Belgium, registration number 0487. All are member companies of the AXA Assistance Group.

We respect your right to privacy and comply with our obligations under the Data Protection Acts 1988 and 2003. The purpose of this Privacy Policy is to outline how we deal with any Personal information you provide to us while visiting this website. Naturally, if you are not happy with this Privacy Policy you should not use this website.

By visiting this website, you are accepting the terms of this Privacy Policy. Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites.

### **Types of information we retain**

We do not capture and store any personal information about you when you access this website, except where you choose to give us your personal details via e-mail or enquiring through our website. In these latter cases, the personal information you give us is used by us for providing you current and future information about us and our products and services and any other services described in this website. We retain two types of information:

"Personal": This is data that identifies you or can be used to identify or contact you and may include your e.g. title, name, address, email address, birth date, telephone number (mobile and landline) and family/partner details for family cover. Such information is only collected from you if you voluntarily submit it to us.

"Non-Personal information": Like most websites, we gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This Non-Personal information comprises information that cannot be used to identify or contact you, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymised, browser types and other anonymous statistical data involving the use of our website.

The AXA Assistance Group as a whole takes your privacy very seriously. We promise to do all we can to protect your privacy and your legal rights.

Any personal information you supply to us via this website will be treated in accordance with the Data Protection Act 1988 and 2003 (including any further amendments) and the European Communities (Electronic Communications Networks And Services) (Data Protection And Privacy) Regulations 2003 as amended by the European Communities (Electronic Communications Networks And Services) (Data Protection And Privacy) (Amendment) Regulations 2008. If you provide personal information via this website you will be told what the information you provide will be used for before the information is submitted to us.

### **How we hold your personal information and why**

The information that you provide to us will be held on a computer, computer database, e-mail, imaged documents, files, and letter and/or in any other way necessary for the conduct of our business.

We will use this information to:

- (i) administer and process any products/services you have purchased from us;
- (ii) administer any future agreements we may have with you;
- (iii) manage any claim notified by you or by a third party; and
- (iv) for client services, research and statistical analyses.

When considering a proposal or administering your insurance contract(s), handling claims, or making decisions regarding payment arrangements, we may carry out searches (for the purpose of verifying your identity and driving experience) and/or a credit search with one or more licensed credit reference agencies. For underwriting and claims purposes, we may request details about your health, and the commission or alleged commission of any criminal offence and conviction. In these applications, you explicitly consent to the processing of your details for these purposes.

### **Who we can share your personal information with**

We shall not disclose your personal information without your consent except in limited circumstances as permitted or required by law. We may share personal information with agents or service providers in connection with providing, administering and servicing the products you have purchased from us or in the course of handling third party claims. Where we choose to have certain services provided by third parties, we do so in accordance with the applicable law and take reasonable precautions regarding the practices employed by the service provider to protect personal information.

We will disclose your personal information if we believe in good faith that we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order or other statutory or legal requirement.

### **Cookies**

We send cookies to your PC from this website. Cookies are pieces of information that a website transfers to your computer's hard disc for record keeping purposes. Cookies can make the web more useful by storing information about your preferences on particular sites, thus enabling website owners to provide more useful features for their users.

We use cookies and tracking software to monitor customer traffic patterns and website usage in order to develop the design and layout of the website to better meet the needs of visitors to the website. This will include non-specific data such as mouse-movements and pages visited.

Should you wish to restrict the data that we collect through our tracking software, you can alter your cookie settings in your browser.

### **Security**

We will take all reasonable steps to ensure that any information you provide via email on this website is kept secure, but please remember that, because of the nature of the internet, the security of emails cannot be guaranteed. Consequently, your privacy cannot be guaranteed. There is no guarantee that any emails sent will be received by us.

### **Money laundering**

We are committed to the fight against criminal activity in the laundering of monies and may require evidence by way of identity checks. Because of that you may be required to provide us with specific identification.

### **Telephone recording**

We reserve the right to record all telephone calls in order to ensure accuracy in the communications of instructions to us. We may record telephone calls for training, security and to improve the quality of customer service. Our recordings shall be and remain our sole property.

### **Insurance-Link**

Where you make a claim, we may pass details of the event to the Insurance-Link Central Register maintained by insurance companies under the aegis of the Irish Insurance Federation. The information will be shared with other insurance companies to safeguard against non-disclosure and help prevent fraudulent claims. Where there are reasonable grounds for suspicion, information may be passed to relevant enforcement agencies.

You have the right of access to the Personal information held about you by Insurance-Link. Please write to our Data Protection Unit, Inter Partner Assistance, P.O. Box 11610, Dublin 1, Ireland, if you would like to know how to access the information on the Central Register.

### **Sale of our business**

We reserve the right to transfer information (including your personal information) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of the Privacy Policy and provided that the third party only uses your personal information for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

### **Where we store and process your personal information**

The Personal information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). From time to time, it may be necessary for your personal information to be transferred to persons in countries outside the EEA. For example your Personal information may need to be processed by staff operating outside the EEA who work for us or one of our service providers. By submitting your personal information to us via this website, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and to ensure that anyone to whom we pass your Personal information agrees to treat such information with the same level of protection as if we were dealing with it.

### **Updating, verifying and deleting personal information**

You may inform us of any changes in your personal information, and in accordance with our obligations under the Data Protection Acts 1988 and 2003 we will update or delete your Personal information accordingly.

You can ask to see the personal information we hold.

You have the right of access to the Personal information we hold about you by sending a written request to our Data Protection Unit, Inter Partner Assistance, P.O. Box 11610, Dublin 1, Ireland, and on payment of a statutory fee. You also have the right to require us to correct any inaccuracies in the information we hold about you.

### **Changes to the Privacy Policy**

Any changes to this Privacy Policy will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use personal information in a manner significantly different from that stated in this Privacy Policy, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.