



Data Privacy Statement

Version 10

May 2018

Document Information

Document Name:	MicroEnsure Data Privacy Statement
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Created by:	Previous employee
Document Owner:	Karl Foster
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History

Date	Version	Revision Author(s)	Notes
18.11.16	1	Previous employee	First draft for review by Group General Counsel
30.11.16	2	Previous employee	Updates made as per Group General Counsel
02.12.16	3	Previous employee	Minor updates made
20.04.17	4	Previous employee	Minor updates from Head of HR
15.08.17	5	Rich Belbin	Change of ownership
05.01.18	6	Karl Foster	Revisions per Group General Counsel
26.03.18	7	Karl Foster	Revisions re GDPR
15.05.18	8	Rebecca Teasdale	Minor updates Head of HR
25.05.18	9	Rebecca Teasdale	Approval
29.05.18	10	Rebecca Teasdale	Change of ownership

Reviewers

Name:	Location:
Karl Foster	Cheltenham, United Kingdom
Martin Fuller	Cheltenham, United Kingdom
Rebecca Teasdale	Cheltenham, United Kingdom
Rich Belbin	Cheltenham, United Kingdom

Approved By

Executive Committee	Cheltenham, United Kingdom
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If you have any suggested changes to this plan or improvement ideas, please notify the document owner.

Related Policies

Policy Title:	Location:
Data Classification Policy	Jamii
Data Privacy Policy	Jamii
Data Retention Policy	Jamii
IT Policy	Jamii

General

This privacy statement applies to Personal Information (as defined below) collected, processed and stored by MicroEnsure Holdings Limited and its group companies, collectively MicroEnsure. Our contact details are set out at the bottom of this Privacy Statement.

MicroEnsure’s privacy policy covers the way in which we use and disclose Personal Information that Employees, Business Partners, Customers and others may provide us with. We may act as either the ‘data controller’ or the “data processor” of the Personal Information you provide us with. These terms are legal phrases used to describe the person or entity that controls the way Personal Information is used and processed; a data controller determines themselves how information is used, a data processor will act on the instructions of the data controller.

“Personal Information” includes any information that, on its own or in conjunction with other information, identifies a living individual, such as your name, address, email address or telephone number.

MicroEnsure recognises that your privacy is very important and so we want you to be confident with the way we handle your Personal Information. We have outlined how we collect, use, disclose and protect this Personal Information and we will process data in accordance with applicable law.

Collection of Personal Information

MicroEnsure receives, processes and stores Personal Information provided by Employees, Business Partners, and Customers. Personal Information may be supplied to us in writing, via email, via telephone, our website or other electronic interfaces.

Use of Personal Information

We use the Personal Information collected from you in any of the following ways:

1. Job Applicants

1.1 Collection and Use of Personal Information

Personal information provided during the recruitment process will only be used for the purpose of the application unless otherwise stated during the process. The Personal Information we ask for is used to assess your suitability for the position only. Where your application is unsuccessful, the Personal Information will be retained for 6 months from the end of the campaign.

1.2 Disclosure of Personal Information

Personal Information disclosed to us during the recruitment process is made available to our HR department and the recruiting team only. Where we retain a third party to conduct recruitment activity; they operate as a data controller and will be subject to their own policies as an employment agency.

1.3 Consent and Legitimate Use

By providing us with your Personal Information, including where applicable sensitive personal data, you consent to the collection and use of any information you provide in accordance with the above purposes and this privacy statement. Notwithstanding the foregoing, there may be separate legitimate grounds for MicroEnsure to process or store your personal information.

2. Employees (current and former)

2.1 Collection and Use of Personal Information

Principally, we collect personal information so that we can fulfil individual employment contracts with our employees.

We may also use your Personal Information for internal administration, analysis, operational/service reviews and the provision of additional employee benefits (e.g. pension enrolment and administration, further education, cycle to work schemes etc.)

2.2 Disclosure of Personal Information

MicroEnsure may share personal information, as necessary, with insurers, pension and/or benefit providers or other relevant third parties so that we can provide the services or benefits requested or to carry out any other obligations arising from the employment contract entered into between you and MicroEnsure.

MicroEnsure may also disclose your Personal Information if required to do so by law.

2.3 Consent and Legitimate Use

By providing us with your Personal Information, including sensitive personal data, such as information on your health, you consent to the collection and use of any information you provide in accordance with the above purposes and this privacy statement. Notwithstanding the foregoing, there may be separate legitimate grounds for MicroEnsure to process or store your Personal Information.

3. Business Partners

2.1 Collection and Use of Personal Information

As an innovative micro-insurance solutions provider MicroEnsure is a data processor for our Business Partners, most notably; Telecom Companies, Banks, Micro-Finance Institutions, Retailers, Agents and Insurers.

We receive and process data relating to the customers of our Business Partners to provide information analysis in handling claims and policy administration activities. When processing claims, we may need to use the Personal Information provided by our Business Partners to communicate directly with their customers to validate claims.

We may also need to share data with other Business Partners, if necessary, to fulfil the insurance obligation to a Business Partner's customer.

3.2 Disclosure of Personal Information

MicroEnsure may share the Personal Information, as necessary, with our business partners, insurers or other relevant third parties so that we can provide the services requested (as described above).

MicroEnsure may also disclose Personal Information if required to do so by law.

3.3 Consent and Legitimate Use

By sharing customer data with us, our Business Partners confirm that they have granted the right to share this information with MicroEnsure and other Business Partners; and that, where appropriate, they are authorised to do so. In addition, they agree to MicroEnsure processing the data in accordance with the contractual agreement in place and this privacy statement.

4. Customers

4.1 Collection and Use of Personal Information

In some circumstances, MicroEnsure may be a data controller, where, for instance we own the customer relationship.

In these circumstances, we collect, process and store the personal data of our customers in accordance with the terms of the specific notice provided to you when taking the services provided.

We may also need to share data with other Business Partners, if necessary, to fulfil our contract with you.

4.2 Disclosure of Personal Information

MicroEnsure may share the Personal Information, as necessary, with our business partners, insurers or other relevant third parties so that we can provide the services requested (as described above).

MicroEnsure may also disclose Personal Information if required to do so by law.

4.3 Consent and Legitimate Use

By providing us with your personal data, including where applicable sensitive personal data, you consent to the collection and use of any Personal Information you provide in accordance with the above purposes and this privacy statement. Notwithstanding the foregoing, there may be separate legitimate grounds for MicroEnsure to process or store your Personal Information.

5. CCTV

We use CCTV at certain of our locations. Where CCTV is used, appropriate signage is used. All CCTV footage is captured purely for security purposes and for the prevention and detection of crime. Images are recorded and retained until automatically overwritten, typically within [4] weeks.

International Transfer

As an international business, we may, unless prohibited by local law, transfer information to other countries, in order to provide our services. [In transferring information, we comply with applicable legal requirements providing adequate safeguards for the transfer of Personal Information.

Our Commitment to Data Security

MicroEnsure will use reasonable endeavours to ensure that information received or directly disclosed to us, and provided by us to any third party when acting as a data controller will be handled in a secure and confidential environment.

To prevent unauthorised access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Controlling your Personal Information

Depending upon the applicable laws in your country, you may have certain rights regarding the Personal Information we hold about you. For example, you may have the right to: obtain confirmation that we hold personal information about you, request access to and receive information about the personal information we maintain about you, receive copies of the Personal Information we maintain about you, update and correct inaccuracies in your Personal Information, object to the processing of your Personal Information, and (where applicable) have the information blocked, anonymised or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements.

If you wish to exercise any of your rights, please write to or email to:

The Data Protection Officer, MicroEnsure, Parker Court, Knapp Lane, Cheltenham, GL 50 3QJ, UK, or by emailing dataprotection@microensure.com

Version and Updates

From time to time, we may update this Privacy Statement without prior notice. Ordinarily this will be effective immediately. We shall post a prominent notice on our website of significant changes. The date of the most recent change is displayed below:

25 May 2018