

## **Asurion Privacy Policy**

We want you to know that we respect your privacy and make every reasonable effort to protect your personal information. It is our policy to process your personal information only for the purposes of our relationship with you, and strictly in accordance with all relevant laws. This scope of this Privacy Policy is for this Website and the services we provide and it describes the personal information we collect and what we do with it. Please read this policy and our Website [Terms and Conditions](#) carefully; by accessing and using this Website you confirm you understand and agree to them.

### **Data Controller**

The controller of your personal information is Asurion Europe Limited with its registered offices at Chiswick Place, 272 Gunnersbury Avenue, Chiswick W4 5QB ("Asurion"). Asurion Europe Limited is registered with the Information Commissioners Office as a Data Controller (number Z2176995).

Asurion Europe Limited is also authorised and regulated in the United Kingdom by the Financial Conduct Authority ("FCA") under FCA register number 502545.

### **Your Personal Information**

Much of the information that we have about you comes from you. When you perform certain transactions, you may give us information such as your name, address, email address, telephone number and other information which may help to confirm your identity. If you use our data back-up service, some of that data may contain personal information. We keep information about the types of services you purchase or otherwise obtain from us and our affiliates. Examples of this include premiums, account balances and payment history. We also collect information using our websites, including information relating to your activity while using our sites and information from online collecting devices known as "cookies" (see below).

If you telephone us we may record the conversation for training purposes and in order to ensure that a proper record is kept of information received from you, but if so we will inform you at the time that a recording may be made.

By providing personal data to us (i.e. information which can identify you and relates to you, whether by itself or when used in conjunction with other information (e.g., your name, policy number, telephone number and other contact details), including information that the Data Protection Act 1998 defines as 'sensitive personal data' (e.g., information about an offence or alleged offence, or any proceedings for any offence committed or alleged to have been committed and related sentences) we will necessarily assume that you expressly consent to this type of information being collected and used in the ways described above (subject to the requirements of the Data Protection Act 1998) including for example for fraud prevention purposes and other requirements imposed by law or regulation.

### **What we do with your Personal Information**

We do not sell your personal information to anyone. We do not share your personal information with companies or organisations outside Asurion who may then use it to contact you about their products or services. We may use third parties to assist us in delivering our services and operating our business. These third parties are contractually prohibited from using any information we provide to them for any purpose not specified by Asurion.

We collect and process your personal information for the purposes of our relationship with you, including assistance with your insurance needs and with your use of applications which you may have bought or licensed from us. We may also contact you about products, features and options in which you have expressed an interest. Whenever your personal information is shared with third parties, it will

be done in accordance with all responsibilities under the Data Protection Act 1998. This includes, for example, putting in place appropriate written terms to protect your personal information and ensuring any export of your personal information outside the European Economic Area is lawful in accordance with the Act. We will only use your personal information for the following purposes:

- confirm your identity;
- administer and contact you about your policy;
- process any claim you make under your policy;
- provide mobile apps;
- provide technical support services;
- carry out internal record keeping;
- internal investigative purposes;
- notify you of a breach of your personal information as may be required by law or otherwise
- record any claim details on relevant databases and registers for fraud detection purposes;
- contact the Police to check your crime reference number in relation to a claim;
- comply with legal or regulatory obligations or as otherwise permitted or required by law or legal process;
- to comply with law, or in the good faith belief that such action is necessary to conform to the requirements of law, or comply with legal process served on us, and to protect and defend our rights or property, including our rights and property and our services, or act in urgent circumstances to protect the personal safety of You and our other visitors;
- to protect against fraud or potential fraud;
- to comply with the law and/or legal process where a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order or judicial or administrative proceeding);
- protect or defend our rights and/or property or the rights and property of others;
- enforce our Terms of Service and/or this Privacy Policy;
- respond to claims that the content(s) of a communication violates the rights of another; and
- if we may decide to reorganise, or divest all or part of our business through sale, assignment, merger or acquisition, or we may acquire a new business. In these circumstances, personal information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business. In such an event, we shall provide notice of any material change to this Privacy Policy, or our Products and Services, in the manner described in this Privacy Policy.

To deliver and support our services to you, your data may be transferred outside the European Economic Area (EEA) to Asurion subsidiaries and affiliated entities, or to other third parties located in the United States or other countries or jurisdictions around the world for the above purposes. If that happens, we will apply comparable protections as in the EEA. If you give us personal information about someone else, you are responsible for having their permission to do so and for telling them who we are and what their information will be used for.

## **Cookies**

### **What is a cookie?**

Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

We use a system of classifying the different types of cookies which we use on the Website, or which may be dropped by third parties through our websites. The classification was developed by the International Chamber of Commerce UK and explains more about which cookies we use, why we use them, and the functionality you will lose if you decide you don't want to have them on your device. The classifications are:

Persistent cookies - these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

Session cookies - these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests. You can also elect to block all cookies by using the cookie blocking options built into your browser software. Please note, however, that if you do decide to block cookies, some parts of this website may not function correctly.

You can find more information about cookies at [allaboutcookies.org](http://allaboutcookies.org) and [youronlinechoices.eu](http://youronlinechoices.eu).

### **Cookies used on the Website**

The cookies used on the Website by category are Session Cookies. They are used by the server to store information about user activities. They allow users to be recognised within the website. They do not store information on the user's hard disk (unlike persistent cookies). Session cookies expire at the end of the session (i.e., when a user closes his browser window the cookie is deleted). Information collected by the session cookie is not stored or retained after that. We call these types of Session Cookies **basic** and **privacy neutral**.

### **Purposes of Cookies**

These cookies:

- improve how this website works based on information (e.g., which links are used and which pages are visited most frequently by a user);
- maintain user preferences including remembering the user's PC/browser or other device to ensure any page changes or item or data selection done is "remembered" when that user moves between pages;
- keep a user logged in to the website as a registered user when moving between pages; and
- direct a user to the correctly branded pages depending on where the user purchased mobile phone insurance package including a check to ensure a user may activate any security app provided as part of their mobile phone insurance cover. At that stage, basic session cookies are used to direct a user to the correctly branded pages to ensure their activated security app facility links back to the insurance coverage as purchased by them.

Third parties are not permitted to set cookies on this website.

### **Accuracy and Completeness of Your Personal Information**

Asurion takes various steps to ensure the accuracy and completeness of your personal information. However, Asurion relies on the telecommunications carriers and retailers to provide accurate and complete enrollment data that they directly collect from you and provide to Asurion. Asurion also relies on you to provide accurate and complete information when submitting a claim or interacting with Asurion for any other purposes. If you think your information is incorrect, please see the section below on how to request a correction.

## **Security of Information**

Information submitted via the Internet, including through a web page or e-mail is subject to interception or incorrect routing, and the Internet is not a fully secure communications channel. Please consider this prior to submitting any information to us via the website. While Asurion follows generally accepted industry standards to protect the information submitted to us, no method of transmission over the Internet, or method of electronic storage, is 100 percent secure. Therefore, while Asurion strives to use commercially acceptable means to protect your personal information, Asurion cannot guarantee its absolute security.

## **Retention and Deletion of Personal Information**

Asurion will retain your personal information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws or legal orders, and you consent to such purpose(s) remains valid with respect to claims data and to file claims related to insurance coverage after termination of Asurion's relationship with you. When personal information is no longer needed, it will be permanently deleted or de-identified.

## **Request to Access, Correct or Delete your Personal Information**

You have the right to request access, correction or deletion of any personal information held about you. An administrative fee may be charged to process your request as permitted by law. If you wish to access, request corrections or deletion of your personal information please send an email to [webmail@newasurion.com](mailto:webmail@newasurion.com) or you may send your request to the postal address listed in the Data Controller section of this privacy policy.

## **Monitoring and Enforcement**

Asurion uses various measures to monitor compliance and enforce the elements in this Privacy Policy. If you have a privacy related query, complaint or dispute, please contact us at [webmail@newasurion.com](mailto:webmail@newasurion.com) or at the postal address listed in the Data Controller section of this Privacy Policy

## **Revisions to this Privacy Policy**

We may periodically update or revise this Privacy Policy. If we do so, we will post a notice on this website to notify users that the policy has been revised.

We want you to feel comfortable about giving us your personal information. If you have any questions or concerns about this Privacy Policy or any other matter pertaining to your personal information, please contact the data protection officer of Asurion at the address above or by emailing us at [webmail@newasurion.com](mailto:webmail@newasurion.com).

This Privacy Policy replaces all previous versions and is as of March 2016. We reserve the right to change the policy at any time.