

Privacy Policy

At ROCK, we respect your right to privacy. This privacy policy will help you understand how ROCK collects, uses and stores your data and the actions we take to protect it. You should show this notice to anyone else included on your policy. Please read this Privacy Policy carefully.

This Privacy Policy should be read alongside and in addition to the Cookies Policy and your Policy Wording (where applicable). If you have any feedback or questions on this policy then please contact us [here](#).

For your information we have included details of who we can speak to regarding your insurance policy. You should make sure you allocate an appropriate person as the Policyholder during your purchase:

Who can:				
	Discuss the Policy	Make a change	Cancel the policy	Update the payment
Policyholder	Yes	Yes	Yes	Yes
Insured person listed on policy	Yes	No	No	No
Third Party Payer*	No	No	No	Yes
Authorised person**	Yes	Yes	Yes	Yes

All callers must pass Data Protection on the Policyholder before discussing the policy.

*Can only make changes related to their card

**Authorised person must be listed on the policy by the Policyholder

For information about how we intend to safeguard your data please see the information below.

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1 About Us

Tesco Personal Finance (trading as Tesco Bank) acts as an intermediary for this policy. The policy is arranged and administered by ROCK Insurance Services Limited (ROCK) who are authorised and regulated by the Financial Conduct Authority (FCA No. 300317) and underwritten by Inter Partner Assistance SA UK Branch (IPA UK) whose ultimate parent company is AXA Partners Holding SA. You can find out more about how ROCK will process and share your data in this Privacy Policy.

ROCK will share some of your information with Tesco Bank as set out in this privacy policy and you can find out more about how Tesco Bank will then process that data by visiting their Privacy Policy at <https://www.tescobank.com/help/privacy-and-cookies/>.

ROCK will also share data with IPA UK so that they can underwrite your policy and if you make a claim. You can find out more about how IPA UK will process your data in the 'Data Protection Notice and Fraud' section of the Policy Booklet and by visiting <https://www.axa-assistance.co.uk/>

Please note that references to "our Website" or "the Website" are to <https://www.tescobank.com/travel-insurance/>

References to "we" or "our" relates to ROCK.

References to "you" or "your" relate to all travellers on the policy.

2 What information we collect

We collect personal data and special category data as part of providing services to you. We may also monitor or record calls, emails, SMS messages or other communications in accordance with UK law.

Types of Data we collect

Personal Data:

- Name including first name and surnames of all persons named on the policy
- Location information including address and telephone information
- Identifiable numbers including credit/debit card details
- Online identifiers including IP address, email and social media

Special Category/Sensitive Data:

- Medical information such as medical condition, treatment, history
- Information about children

We will also assign you a policy number and/or medical endorsement number which we will record alongside your other personal details.

If you provide us with details relating to other individuals, please ensure that you have those individuals' consent to provide their personal data (including medical data). It is your responsibility to make them aware that we will use those details for the purposes of the relevant insurance policy or services. Please direct them to this privacy policy if they require more information.

Some information is necessary in order to provide you with the service you expect. If you do not provide us with the requested information, we may not be able to offer you the applicable insurance policy.

3. When we collect your data

We will collect your personal data when:

- You ask for a quote
- You make enquiries through a price comparison website
- You purchase our products and services or those provided by our service partners
- You make general enquiries
- You register for information or other services
- You respond to communications or surveys
- You make a complaint
- You need to make a claim or ask for assistance

If your data is not collected on a website that is part of ROCK insurance Group, it will be passed to us by the retailer or price comparison website so that we can administer your policy.

4. How we use your data

- To provide you with a quote
- Completing your purchase including taking payment, providing payment confirmation and sending you your certificate of insurance
- Carrying out any amendments to your policy at your request including cancelling, providing a refund (where permitted), referring to an underwriter, answering queries or handling a complaint
- Verifying your identity when required including validating the policy for a claim or assistance
- To offer a renewal of an annual policy
- Assessing sales performance and providing sales and claims management information to Tesco Bank and the Inter Partner Assistance.
- Making sure that we are safeguarding your interests through quality assessments, training and competency, customer surveys and staff feedback
- Providing Tesco Bank relevant information so they can manage the Clubcard scheme
- Engaging with you in relation to your existing quote and/or policy, its expiry and requesting you to provide feedback on your experiences
- Keeping you informed of our latest offers and products

5. Who has access to your data

ROCK uses a number of third parties to provide and administer your insurance. This includes:

- The Insurer, Underwriter, Underwriting Agent, Claims and Assistance Handlers in order to administer your policy. See your policy wording for their details.
- Paysafe for payment services.
- Rackspace who host our e-commerce platforms.
- SendGrid for your policy certificate and confirmation emails.
- Pure360 for emails about our services, such as the renewal programme.
- Mitel for data given over by telephone, email contact or live chat.
- Twilio for SMS.
- Apteau for our complaint handling.
- Google Analytics for tracking website use.
- Legal Authorities such as the Financial Conduct Authority, Financial Ombudsman Service, Information Commissioner's Officer, Department of Social Security and HM Revenue and Customs on request.
- Tesco Bank.

It is our aim to only use providers who will ensure your data is processed in the UK or European Union (EU) to provide a high standard of data protection. However we accept that we work in a global environment and cannot completely limit the transfer of data. Where data is transferred outside the UK or EU we require it to be protected according to the applicable laws.

6. **Legal basis for use of your information**

We must make sure that there is an appropriate lawful reason for us to process your data. These legal bases are set out in data protection law and we rely on a number of different conditions for the activities we carry out.

Necessary for the performance of contract:

Providing a quote

Completing a purchase and providing payment confirmation and a certificate of insurance

Taking payment (card or direct debit)

Carrying out mid-term adjustments/amendments

Answering any queries

Cancelling a policy and providing a refund if applicable

Handling complaints

Referring to an underwriter/insurer

Validating a policy for a claim or assistance

Offering a renewal and advising your annual policy has ended

Processing sales obtained by an API

Sending policy details to the Tesco Bank and the insurer

Premium reconciliation

Ad hoc correspondence with you

Making payments to the insurer and other business partners as necessary

We have a legal obligation to:

Quality assess policies

Manage training and competency of our staff

Assessing sales KPIs (key performance indicators)

Giving feedback to our staff

Ad hoc reporting

Necessary in our legitimate interests or those of a third party:

Informing Tesco Bank and the insurer about you so that they can manage any Clubcard points or incentives.

Providing sales and claims management information to Tesco Bank and the insurer

Sending commission reports.

Providing a timely reminder for you to check that your policy is suitable for your needs.

Where we process your data using your consent:

Consent Required	Activity
X	We will send you important information about your policy, including your Certificate of Insurance, a renewal notice if you have purchased an Annual policy and a timely reminder asking you to check that your policy is suitable for your needs.
✓	We will only send you additional information about our products and services if you choose to opt in to that activity during the purchase of a policy. You can always opt out later if you change your mind. Contact us here if you also want to opt out of this process.
✓	We will only send you information about other companies' products and services if you choose to opt in to that activity during the purchase of a policy. You can always opt out later if you change your mind. Contact us here if you also want to opt out of this process.
✓	If you require cover for your medical conditions we also must have explicit consent to process any data relating to medical information such as medical conditions, treatment and history – we will be unable to provide you with the relevant policy without explicit consent.
✓	If you require cover for your medical conditions we also need to make you aware that we determine whether or not we can offer cover for any pre-existing medical conditions, as set out above, by carrying our automated decision-making. We cannot undertake this process without your consent.
✓	If you need to make a medical assistance claim then your medical information will be needed by the Assistance Company in order to process that claim.

7. – Retaining your information

Your personal data shall be retained as long as needed for the authorised purposes listed in section 4. This includes retention of some personal data following the end of our relationship with you, for example to resolve any potential disputes and for ongoing or prospective legal proceedings, to maintain records of our services, and otherwise to comply with our legal obligations and to defend our legal rights. We keep any data used to create a quote for **14 days**. If you purchase a policy from us all policy data is kept for **7 years** from its end/expiry or cancellation. All other correspondence and voice recordings will be retained for **8 years**.

Please [contact us](#) if you need further information about our retention periods.

8. – Security of your information

We regularly review the technical and organisational security measures we have in place on our information and communications systems in order to prevent the loss, misuse or unauthorised alteration of your personal information. We also use industry standard security to encrypt sensitive data in transit to our servers.

Communications sent through our website, email or social media, rely on the internet which is a publicly hosted network and is therefore not secure unless the site has been encrypted. ROCK cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

ROCK has deployed an adequate procedure to identify and communicate any incident of data breach within a delay of 24 hours and to resolve it within a reasonable delay.

Further information about security measures we apply to communications sent by email or over our website is available on request.

9. – Your Legal Rights

You have the following Individual Rights:

- ✓ The **right to be informed** about how we collect, use and store your data through this Privacy Policy
- ✓ The **right of access** to your data and to request a copy of the personal data we hold about you. Please contact us [here](#) and we will acknowledge your email within 48 hours. We will not charge you for this request and we will make sure that you receive your information within 40 days.
- ✓ The **right to request that we correct any inaccurate data**. Please contact us [here](#) and we will take action to correct the data and confirm to you once this has been done.
- ✓ The **right to ask us to erase** any data that we hold. Please contact us [here](#). Your request will then be considered and we will write to you by email to inform you of the outcome of our decision and any actions that we will take.

- ✓ The **right to withdraw consent** to your data being used to receive direct marketing communications. You can opt out [here](#).
- ✓ The **right to ask us to transfer your data** to a new provider. You can make this request [here](#).
- ✓ The **right to complain** about how your data is being collected, used or stored. You can complain by clicking [here](#). Alternatively you can contact our Data Protection Officer as follows:

FAO Sarah Hall-Strutt, Data Protection Officer
Rock Insurance Services Limited
Griffin House, 135 High Street, Crawley, West Sussex, RH10 1DQ
Telephone: 0333 202 5670
Email: DPO@rockinsurance.com

If you are dissatisfied with the response then you have the right to appeal to the **Information Commissioners Office**. Please visit <https://ico.org.uk/> for further information about how to do this.

10. – Terms

Terms relating to your insurance policy (where relevant) are provided separately by us and can be found in your Policy Wording.

11. – Changes to this policy

This privacy policy was last updated on 01/04/2021. We reserve the right to make changes to this policy and you will be prompted of any changes when you next visit our website.

From time to time we may need to change the way we use your personal data. Where we believe you may not reasonably expect such a change we will write to you. When we do so, you will have 60 days to object to the change.