



Toyota  
Insurance Services

# PRIVACY NOTICE

## Toyota Excess Protection



## Toyota Excess Protection Privacy Notice

Your privacy is very important to us. We promise to respect and protect your personal information and to make sure that your details are accurate and kept up to date. This Toyota Excess Protection Privacy Notice sets out details of the information that we may collect about you and how we may use that information when providing us with information about your experience with us. Please take your time to read this Privacy Notice carefully. When using our website, this Privacy Notice should be read alongside the website terms and conditions. We reserve the right to make changes to this Privacy Notice at any time and for any reason. We will alert you about any changes by updating the "Last Updated" date of this Privacy Notice. Any changes or modifications will be effective immediately upon posting the updated Privacy Notice on the website, and you waive the right to receive specific notice of each such change or modification.

### 1. About Toyota Insurance Management UK Limited ►

In this Privacy Notice references to "we" or "us" refer to refers to Toyota Insurance Management UK Limited and any holding and its subsidiary companies. We are part of the MS&AD Insurance Group. We will share data within the group, but this is limited to our group companies within the European Economic Area (EEA), except in exceptional circumstances where we may need to discuss a policy or claim with our parent companies.

When you apply for Toyota Excess Protection, your policy will be underwritten by Astrenska Insurance Limited trading as Collinson ("Collinson"), regulated by the Financial Conduct Authority ("FCA") to carry on insurance business. Reg No. 202846. Its principal office is at Sussex House, Perrymount Road, Haywards Heath, West Sussex, United Kingdom, RH16 1DN.

In order to provide our services, we will collect and use data about individuals. This means that we are a 'data controller' and we are responsible for complying with data protection laws. We have appointed a data protection officer to oversee our handling of personal information. If you would like more information about how we collect, store or use your personal information, please see **section 9 "Contact us"**.

Toyota Insurance Management UK Limited and Astrenska Insurance Limited will act as joint controllers when determining the purposes and means of processing for the Excess Protection. Further information on the responsibilities of each entity is available upon request.

Toyota Insurance Management UK Limited will exclusively process your personal information for marketing purposes where you have accepted receipt of marketing communications. For the avoidance of doubt, Collinson will not process your personal information for marketing purposes.

### 2. What do we mean by personal information? ►

"Personal information" means information that relates to you as an individual, whether linked to your name or any other way which you could be identified. Certain types of personal information are considered to be "special categories of information" due to their more sensitive nature. We will not ordinarily process special categories of data relating to customer experiences.

**Special categories of information:** Information about your health, criminal convictions, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.

### 3. Our processing of your personal information ►

The personal information that we collect can vary. For example, we may collect more detailed information about you if you make a claim.

#### 3.1. If you are a policyholder

*(This section shows what personal information we collect about you and use if you are a policyholder)*

What personal information will we collect and where will we collect it from?

We may obtain information about you during the lifetime of your policy, and if you claim against your insurance.

This information includes:

- **Individual details:** Your name and title, address, contact details (e.g. email /telephone), date of birth.
- **Financial information:** Bank and payment information. All of this information will be obtained from you if you attempt to make a claim.
- **Additional identification details:** This may include details of your car. All of this information will be obtained from you.
- **Claims information:** In relation to any incident involving the insured car. All of this information will be obtained from you.
- **Marketing preferences:** Where relevant, including whether you have requested not to receive marketing information.
- **Website usage, including Cookies:** See **section 3.2** for details.
- **Other information:** that we capture during recordings of our telephone calls, or if you make a complaint. This may include special categories of information you volunteer when communicating with us. We will only process such information to the extent necessary in connection with the policy or claim, or where in connection with legal proceedings. Any further processing will only be with your explicit consent.
- **Anti-fraud data:** In the event of a claim being made, we will undertake sanctions checks before any payments are made.
- **Open source data:** Unstructured data which is in the public domain, including social media, about you, or the circumstances of any accident.

The external sources that provide us with information about you may include:

- Other MS&AD Insurance Group companies.
- Relevant Toyota Group Companies (including, but not limited to, Toyota (GB) PLC and Toyota Financial Services (UK) PLC and Kinto UK Ltd.)
- Third party suppliers we appoint to help us to carry out our everyday business activities including IT suppliers, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- Credit reference agencies.
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions including MIAFTR.)
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or regulators (e.g. FCA).
- If you provide personal information to us about other people you must provide them with a copy of this Privacy Notice, and obtain relevant consent from them where we have indicated in this Privacy Notice that we need it.
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media)
- The police, and other crime prevention and detection agencies.

#### What will we use your personal information for?

We may process your personal information for a number of purposes. For each purpose, we will rely on one or more of the following legal grounds:

- We need your personal information because it is necessary to enter into or perform the contract.
- We have a legitimate interest to use your personal information (e.g. business records, carry out strategic business analysis, review our business planning and develop and improve our products and services). When using your personal information in this way, we will always consider your rights and interests.
- We have a legal or regulatory obligation to use your personal information (e.g. to meet record-keeping requirements of our regulators).

Details of the types of processing we will undertake are found in the table below:

Type of Processing	Grounds for using personal information	Grounds for special categories
To set up your insurance policy.	<ul style="list-style-type: none"> <li>To enter into or perform a contract.</li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special category of information for this purpose.</li> </ul>
To manage and service your insurance policy and to answer queries you might have.	<ul style="list-style-type: none"> <li>To enter into or perform a contract.</li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special category of information for this purpose.</li> </ul>
To manage any claims you make under your insurance policy (including via the Online Portal).	<ul style="list-style-type: none"> <li>To enter into or perform a contract.</li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special category of information for this purpose.</li> </ul>
To prevent and investigate fraud on an ongoing basis.	<ul style="list-style-type: none"> <li>To enter into or perform a contract.</li> <li>We have a legal or regulatory obligation.</li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special category of information for this purpose.</li> </ul>
To ensure that we consider any customers who may be in a vulnerable circumstance.	<ul style="list-style-type: none"> <li>We have a legal or regulatory obligation.</li> <li>We have a legitimate interest <i>(to ensure that service delivered to all of our customers is appropriate to their individual needs and is consistent with our FCA obligation to deliver good customer outcomes).</i></li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose.</li> </ul>
To communicate with you and resolve any complaints that you might have.	<ul style="list-style-type: none"> <li>To enter into or perform a contract.</li> <li>We have a legitimate interest <i>(to send you communications, record and handle complaints).</i></li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose.</li> <li>To establish, exercise or defend legal rights.</li> </ul>
To provide improved quality, training and security (e.g. through recorded or monitored phone calls to / from us, or customer satisfaction surveys).	<ul style="list-style-type: none"> <li>We have a legitimate interest <i>(to develop and improve our products and service).</i></li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special categories of information for this purpose.</li> </ul>
Managing our business operations (e.g. keeping accounting records, analysing financial results, meeting audit requirements, receiving professional advice, and holding our own insurance).	<ul style="list-style-type: none"> <li>We have a legitimate interest <i>(to carry out business operations and activities that are necessary for the everyday running of a business).</i></li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special categories of information for this purpose.</li> </ul>
To provide an enhanced customer experience and to improve our service to you across the Toyota Group's products, services, systems and processes.	<ul style="list-style-type: none"> <li><i>We have a legitimate interest (to ensure a consistent service to all of our customers and to improve our products and services).</i></li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special categories of information for this purpose.</li> </ul>
For insurance administration purposes including trend analysis, actuarial work, pricing analysis of customer experience, planning service delivery, risk assessment and costs and charges.	<ul style="list-style-type: none"> <li>We have a legitimate interest <i>(to develop and improve our products and services).</i></li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special categories of information for this purpose.</li> </ul>
Monitoring usage of our websites.	<ul style="list-style-type: none"> <li>We have a legitimate interest <i>(to assess usage of our website).</i></li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special categories of information for this purpose.</li> </ul>

To send you marketing materials about our product and services. You can opt out of marketing at any time.	• We have a legitimate interest <i>(to assess usage of our website).</i>	• We will not process special categories of information for this purpose.
To conduct customer analysis (including customer segmentation) to assist us in identifying the products and services most suitable for our customers.	• We have a genuine business need <i>(to target our marketing communications)</i>	• We will not process your special categories of information for this purpose
To send you marketing materials from related products and services from other Toyota or other MS&AD Group companies and carefully chosen third parties.	• We have your explicit consent <i>(to send you marketing materials about our products and services and those of carefully chosen third parties).</i>	• We will not process your special categories of information for this purpose.

**Who will we share your personal information with?**

On occasion, we will share personal information within the MS&AD Insurance Group or with the following third parties for the purposes laid out in the table above:

- Anyone authorised to act on your behalf.
- Any third party who manages the policy administration, claims and complaints on our behalf.
- Collinson who underwrite your Toyota Excess Protection policy on our behalf.
- Third party suppliers we appoint to help us to carry out our everyday business activities including outsourced business process management providers, claims, our subcontractors, IT suppliers, auditors, lawyers, document management providers, and tax advisors.
- Credit reference agencies.
- Relevant Toyota Group Companies including Toyota (GB) PLC, Toyota Financial Services and Kinto UK Limited.
- Carefully chosen third-party suppliers of products and services (where we have your permission to do so).
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions including MIAFTR.)
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or professional regulators (e.g. the FCA in the UK).
- The police and other crime prevention and detection agencies. We and fraud prevention agencies may enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
- Selected third parties in connection with any sale, transfer or disposal of our business.

If you would like more information about any of the above uses of your personal information, please see **section 9 "Contact us"**.

**3.2 Users of our website and cookie usage**

*(This section will detail what personal information we collect about you and use if you access and use any of our websites or receive email marketing communications from us).*

**What personal information will we collect and where will we collect it from?**

We will only rely on essential cookies to provide services via our website. These cookies cannot be turned off as they are necessary for our website to function.

If you have agreed to receive marketing communications from us, we will also use pixel tracking in emails you receive from us, to help us understand your engagement with our marketing communications.

**What will we use your personal information for?**

We may process your personal information for a number of different purposes. We must have a legal ground for each purpose, and we will rely on the following ground:

- We have a legitimate interest to use your personal information such as maintaining our business records, monitoring usage of our website and marketing our services and improving our business model and services. When using your personal information in this way, we have considered your rights and ensured that our business need does not cause you harm.

We've shown how we use your personal information, and the legal grounds we rely on, in the table below:

Type of Processing	Grounds for using personal information	Grounds for special categories
Communicating with you and responding to any enquiries you have.	<ul style="list-style-type: none"> <li>We have a legitimate interest <i>(to respond to any enquiries)</i>.</li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special categories of information for this purpose.</li> </ul>
Monitoring usage of our website.	<ul style="list-style-type: none"> <li>We have a legitimate interest <i>(to assess to assess usage of our websites)</i>.</li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special categories of information for this purpose.</li> </ul>
Monitoring engagement with our marketing communications.	<ul style="list-style-type: none"> <li>We have a legitimate interest <i>(to communicate with you)</i></li> </ul>	<ul style="list-style-type: none"> <li>We will not process your special categories of information for this purpose.</li> </ul>

If you would like more information about any of the above uses of your personal information, please see **section 9 “Contact us”**.

#### 4. What is our approach to sending your personal information abroad?

Sometimes we (or third parties acting on our behalf) will transfer personal information that we collect about you to countries outside of the EEA. We or our service providers may use cloud based computer systems (i.e. network of remote servers hosted on the internet which process and store your information) to which foreign law enforcement agencies may have the power to require access. Our contracts with these firms will detail the necessary requirements to ensure your information is protected. We will assess these firm’s security arrangements from time to time ensuring that they are only using your information as agreed.

Should you wish to obtain further information about the safeguards we have in place, please contact the Data Protection Officer. Where a transfer occurs we will take steps to ensure that your personal information is protected. We will use a set of contract wording known as the “standard contractual clauses” which has been approved by the data protection authorities.

If you would like more information regarding our data transfers, please see **section 9 “Contact us”**.

#### 5. Marketing ►

We take privacy very seriously and will only use your personal information for the purposes laid out in this Privacy Notice. Unless you have opted out, we will contact you about marketing – for example, to offer other services, customer surveys to improve our processes and services or to ask if you want to take part in a competition we might run. You are free to object to receiving any marketing material and can edit your marketing preferences at any time. To opt out of marketing communications please email [Unsubscribe.affinity@toyotainsuranceservices.co.uk](mailto:Unsubscribe.affinity@toyotainsuranceservices.co.uk) or click “unsubscribe” on any marketing message we send you.

Please be aware that we have a legitimate interest to be able to contact you to discuss how your policy is being administered. This form of contact falls outside of your marketing preferences and must continue in order for us to be able to provide you with a policy effectively.

#### 6. How long do we keep your personal information for? ►

We will keep your personal information for as long as reasonably necessary to fulfil the purposes set out in **section 3** above and to comply with our legal and regulatory obligations. For example:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We have a detailed retention policy in place which governs how long we will hold different types of information for. The exact time period will depend on the purpose for which we collect that information, for example:

- Policies: 7 years
- Claims: 7 years
- Complaints: 7 years

For more information about how long your personal information will be kept, please see **section 9 “Contact us”**.

## 7. Your rights ►

Under data protection law you have a number of rights in relation to the personal information that we hold about you. You can exercise these rights by contacting us. We will not usually charge you in relation to a request.

The right to access your personal information	You are entitled to a copy of the personal information we hold about you and certain details of how we use it. We will usually provide your personal information to you in writing unless you request otherwise. Where your request has been made electronically (e.g. by email), a copy of your personal information will be provided to you by electronic means where possible.
The right to rectification	We take reasonable steps to ensure that the information we hold about you is accurate and where necessary up to date and complete. If you believe that there are any inaccuracies, discrepancies or gaps in the information we hold about you, you can contact us and ask us to update or amend it.
The right to erasure	This is sometimes known as the 'right to be forgotten'. It entitles you, in certain circumstances, to request deletion of your personal information. For example, where we no longer need your personal information for the original purpose we collected it for or where you have exercised your right to withdrawn consent. Whilst we will assess every request, there are other factors that will need to be taken into consideration. For example we may be unable to erase your information as you have requested because we have a regulatory obligation to keep it.
The right to restriction of processing	In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to use your personal information.
The right to data portability	In certain circumstances, you can request that we transfer personal information that you have provided to us to a third party.
The right to object to marketing	You have control over the extent to which we market to you and you have the right to request that we stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email that we send to you or by contacting us using the details set out in <b>section 5</b> . Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.
The right to object to processing	In addition to the right to object to marketing, in certain circumstances you will also have the right to object to us processing your personal information. This will be when we are relying on there being a genuine business need to process your personal information. Please note, in some circumstances we will not be able to cease processing your information, but we will let you know if this is the case.
Rights relating to automated decisions	You will not be subject to any automated decisions for this purpose
The right to withdraw consent	Where we rely on your consent in order to process your personal information, you have the right to withdraw such consent to further use of your personal information. Please note that for some purposes, we need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy or we may be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent.
The right to lodge a complaint with the ICO	You have a right to complain to the Information Commissioner's Office if you believe that any use of your personal information by us is in breach of applicable data protection laws and / or regulations. More information can be found on the Information Commissioner's Office website: <a href="http://www.ico.org.uk">www.ico.org.uk</a> . This will not affect any other legal rights or remedies that you have.

Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request, such as where complying with it would mean that we couldn't comply with our own legal or regulatory requirements. In these instances we will let you know why we cannot comply with your request.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued. For example, if you request erasure of your personal information, we would not have the information required to pay your claim. We will inform you of this at the time you make a request.


## 8. How we protect your information ►

The protection of your personal data is important to us. We take a number of technical and procedural measures to protect personal data. For example:

- Where we capture your personal information through our website, we will do this over a secure link using recognised industry standard technology (SSL) which encrypts data that is transmitted over the internet. Most browsers will indicate this by displaying a padlock symbol on the screen.
- We prevent unauthorised electronic access to servers by use of suitable firewalls and network security measures. We use strong internal antivirus and malware monitoring tools and conduct regular vulnerability scans to protect our internal infrastructure and also to protect communications we may send you electronically. Our servers are located in secure data-centres that are operated to recognised industry standard. Only authorised people are allowed entry and this is only in certain situations.
- We ensure that only authorised persons within our business have access to your data and conduct regular checks to validate that only the correct people have access. We promote responsible access to data and segregate who can see what data within the organisation.
- Internally in our organisation, we have password policies in place which ensure passwords are strong and complex and are changed regularly.
- We use secure email exchange where necessary for sensitive data and have monitoring on all email we send and receive.
- We schedule periodic checks of all security measures to ensure they continue to be efficient and effective, taking into account technological developments.

## 9. Contact us ►

If you have a query relating to our products or services, please visit the website and contact the appropriate department there. You may contact our Data Protection Officer if you would like to exercise the GDPR rights set out above in **section "7. Your Rights"**, or if you have any questions about how we collect, store or use your personal information:

 FAO Data Protection Team, Nukula Ltd T/A InsureThat Stirling House, Sitka Drive, Shrewsbury Business Park, Shrewsbury, Shropshire, SY2 6LG

 [dataprotection@insurethat.com](mailto:dataprotection@insurethat.com)

## 10. Updates to this Privacy Policy ►

We may need to make changes to this Customer Experience Privacy Policy periodically, for example, as a result of government regulation, new technologies, or other developments in data protection laws or privacy generally or where we identify new sources and uses of personal information (provided such use is compatible with the purposes for which the personal information was originally collected). The Data Protection Officer will ensure that this document is updated regularly or as legislation requires.

**This Privacy Policy was last updated on 22nd July 2024 and comes into effect on 22nd July 2024.**





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