

Aircrowcare.com Privacy Policy

1st August 2023

The Aircrowcare Network includes associated intermediaries, insurance companies, brokering and management companies, as well as assistance and operations companies. We are all committed to ensuring your privacy and personal information is protected. The document that referred you to this notice (for example, a short form privacy notice in an application form or terms and conditions in your insurance policy) shall set out details of the Aircrowcare company that is processing your personal information; it is the data controller of your personal information and is responsible for complying with data protection laws. For the purposes of this Privacy Policy, references to "Company," "we," or "us" shall refer to that Aircrowcare company.

This Privacy Policy should be brought to the attention of any individual who is included in your communications with us for the purposes of entering into or having entered into a contract with us and where they have given you consent to act on their behalf.

By providing your personal information or the personal information of someone included in your policy, you acknowledge that we may use it only in the ways set out in this Privacy Policy. "Personal Information" is information that identifies and relates to you or other individuals (such as your dependents) and we detail this in Section 2 below. Our aim is responsible handling of Personal Information. We respect your privacy and are committed to protecting it through compliance with this Policy.

Last Updated: AUGUST 2023

This Privacy Policy applies to information we collect:

- On this Website, the software applications made available by us for use on or through computers and mobile devices ("Apps") (collectively, including the Website and the Apps, referred to as the "Aircrowcare Online Services"); and
- Other means (for example, from your application and claim forms, telephone calls, emails and other communications with us, as well as from claim investigators, medical professionals, witnesses or other third parties involved in our business dealings with you).

Who to Contact About Your Personal Information

If you have any questions about our privacy policy or our use of your Personal Information you may contact the Data Protection Officer. Contact details are below:

For Aircrowcare.com

The Data Protection Officer

Paul Bus, Het Poortgebouw | Beach Avenue 54-62|Schiphol | 1119 PW|

Email address: info@aircrewcare.com

What Personal Information Do We Collect About You?

Depending on your relationship with us (for example, as a consumer policyholder; insured person benefiting under another policyholder's policy, or claimant; witness; commercial broker or appointed representative; or other person relating to our business), we may receive Personal Information about you and your dependents for example when:

- You request or obtain a quote
- You purchase an Aircrewcare product from us or one of our partners, brokers or other third parties
- You use Aircrewcare online services
- You telephone, text, or write by post or email to the Aircrewcare Group
- You make a claim

This information may include:

- **General identification and contact information**

Your name; address; e-mail and telephone details; gender; marital status; family status; date of birth; passwords on our systems; educational background; physical attributes; activity records, such as driving records; photos; employment history, skills and experience; professional licenses and affiliations; relationship to the policyholder, insured or claimant; and date and cause of death, injury or disability.

- **Identification numbers issued by government bodies or agencies**

Social Security or national insurance number; passport number; tax identification number; military identification number; or driver's or other license number.

- **Financial information and account details**

Payment card number; bank account or other financial account number and account details; credit history and credit score; assets; income (including salary); and other financial information.

- **Sensitive Personal Information**

- **Medical condition and health status**

Current or former physical or mental or medical condition; health status; injury or disability information; medical procedures performed; personal habits (for example, smoking or consumption of alcohol); prescription information; and medical history.

- **Other sensitive information**

In certain cases, we may receive sensitive information about you. This may include information about your race or ethnic origin, politics, religious beliefs, trade union membership, genetics, biometrics, sex or sexual orientation. For example, if you apply for insurance through a third party marketing partner that is a professional, trade, political, religious or community organization. In addition, we may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud. We may also obtain sensitive information if you voluntarily provide it to us (for example, if you express preferences regarding medical treatment based on your religious beliefs).

- Where we collect any of this type of information (known as "sensitive" or "special category" information) we will always be clear to explain when and why we need it, and the purposes for which we will use it, and, where required by law, we will obtain your explicit consent before we use it.

- **Telephone recordings**

Recordings of telephone calls to our representatives and call centers.

- **Photographs and video recordings**

Photographs or video recordings created in connection with our insurance or other business activities, including for claims assessment, processing, settlement, and disputes, or for other relevant purposes as permitted by law.

- **Information to investigate or prevent crime, including fraud and money laundering**

For example, insurers commonly share information about their previous dealings with policyholders and claimants for this purpose.

- **Information enabling us to provide products and services**

Location and identification of property insured; travel plans; age categories of individuals you wish to insure; policy and claim numbers; coverage/peril details; cause of loss; prior accident or loss history; your status as director or partner, or other ownership or management interest in an organization; and other insurance you hold.

- **Personal Information about others**

We may collect information about other members of your household or family, for example, family members who may be included on a travel or health insurance policy or on whose life you take out a life insurance policy.

If you give us information about another person it is your responsibility to ensure and confirm that:

- you have told the individual who the Aircrewcare Group is and how we use personal information, as set out in this Privacy Policy; and

- you have permission from the individual to provide that personal information (including any sensitive personal information) to us and for us to process it, as set out in this Privacy Policy.

How/ Where Do We Collect The Information

- **We collect information from the Aircrewcare website (through Cookies and similar technologies)**

We collect information through “Cookies” and other similar technologies to remember you when you visit our website [and Mobile Apps]. Cookies are text files placed on your computer or device to collect standard internet log information and visitor behaviour information. This information is used to track and help us understand how you and others use our website and Mobile Apps, view our products and respond to advertising so we can enhance our overall product and service offering.

To find out more about Cookies and related technologies that we use, please read our separate Cookies Policy.

For further information about Cookies in general, visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies or to alert you to when websites set or access cookies. The above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may become inaccessible or not function as a result.

- **We collect information from Aircrewcare Mobile Apps**

- **We collect information via other Online channels**

We collect information about you from analytics providers such as Google, which includes the following:

- your gender;
- your age;
- your language of preference;
- your interests;
- your location via IP addresses;
- your internet provider;
- your computer's operating system;
- your web browser; and
- your behavior on the website, such as how long you have spent on each page, how you got to the page, and whether you are a new visitor.

- **We collect information from search information providers**

- **We collect information from Third Parties**

We may collect information about you from third parties such as:

- your insurance intermediary or other organisations providing services to them;
- your employer;
- your health professional;
- other insurers (directly or using shared databases such as a register of claims);
- other third party databases which have been established to help detect and prevent fraudulent activity;
- and
- other publicly available sources such as social media, commercially available sources and information from our affiliates or business partners.

We will always seek your permission to contact these people for your information.

How We Use The Information About You And Why We Need It

We use the Personal Information collected:

a) In relation to any quotes requested, or your insurance products and services taken out to enable us to perform the contract we are about to enter into or have entered into with you:

- Communicate with you and others as part of our business;
- Send you important information regarding changes to our policies, other terms and conditions, our Aircrewcare Online Services and other administrative information;
- Provide quotes and make decisions about whether to provide insurance and assistance services, and other products and services which we offer, and provide such products and services, including claim assessment, processing and settlement; and, where applicable, manage claim disputes;
- Process your premium and other payments;
- Identify you to anyone to whom you send messages through any of the Aircrewcare Online Services;

Without the Personal Information collected we may be unable to offer, accurately underwrite or administer your policy, product or service.

b) To ensure we are able to adhere to legislation and regulatory obligations such as to:

- Prevent, detect and investigate crime, including fraud and money laundering;
- Resolve complaints, and handle requests for data access or correction;
- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering, sanctions and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence);

c) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. This will enable us to effectively manage our business, such as to:

- Provide improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers);
- Assess your eligibility for payment plans;
- Carry out research and analysis, and manage other commercial risks, including analysis of our customer base and other individuals whose Personal Information we collect as explained in this Privacy Policy;
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; data analytics; business continuity; and records, document and print management;
- Establish and defend legal rights; protect our operations or those of any of our group companies or business partners, our rights, privacy, safety or property, and/or that of our group companies, you or others; and pursue available remedies or limit our damages.

How We Share Your Information Within The Aircrewcare Group

As we are an international business, we may share and aggregate information about you from across the Aircrewcare Group, including personal information held within the Aircrewcare Group relating to other policies held with us, quotes or claims details and, depending on your preferences, we may use this information to:

- help us identify products and services that may be of interest to you, to tailor and package our products and services;
- to determine pricing and/or offer available discounts; and
- Conduct customer research and develop marketing campaigns.

If you request a quote, or purchase a product or service from us, your personal information will be used and shared within the Aircrewcare Group for the purposes of administration (including underwriting, determining premiums, managing claims and offering renewals). We will use your information to communicate with you about your quote, product or service, including improvements we make to the ways you can access your information.

How We Share Your Information Outside The Aircrewcare Group

Aircrewcare may make your information available to:

- **Insurance and Distribution Parties**

In the course of marketing, providing insurance (for instance if you request a quote, or purchase a product or service) and processing claims, your personal information may be shared with and processed by our associated companies, introducers, intermediaries, insurers, reinsurers, insurance and reinsurance brokers, and their agents or appointed representatives, other distributors, affinity marketing partners, financial institutions and securities firms as well as the policyholder (for a corporate policy) and your broker or agent for the purposes of administration (i.e. progressing a claim made by you), including third parties providing services to them, (as detailed above).

- **Our service providers**

External third-party suppliers or service providers, such as medical professionals, accountants, actuaries, auditors, experts, lawyers and other outside professional advisors; travel and medical assistance providers; call center service providers; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; banks and financial institutions that service our accounts; third-party claim administrators; document and records management providers; claim investigators and adjusters; examiners; jury consultants; translators; and similar third-party vendors and outsourced service providers that assist us in carrying out business activities, for example, to help administer your policy, to help us manage and store data, provide data analytics, conduct market research and to communicate with you effectively. This may include any online or digital partners we work with, so we, or our online or digital partners on our behalf, can communicate with you through their platforms.

- **Regulatory bodies**

We may share your information with regulatory bodies [in the EU and overseas] as well as with other insurance companies (directly and via shared databases) to prevent and detect fraud.

- **Governmental authorities and third parties involved in court action**

Aircrewcare may also share Personal Information with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies) in response to lawful requests by such public authorities; and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate: (a) to comply with national security or other law enforcement requirements; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to comply with applicable law, including laws outside your country of residence; (e) to enforce our terms and conditions; (f) to protect our operations or those of any of our family of companies; (g) to protect our rights, privacy, safety or property, and/or that of our family of companies, you or others; and (h) to allow us to pursue available remedies or limit our damages.

- **Other Third Parties**

We may share Personal Information with payees; emergency service providers (fire, police and medical emergency services); retailers; medical networks, organizations and providers; travel carriers; credit bureaus; credit reporting agencies; and other people involved in an incident that is the subject of a claim;

as well as purchasers and prospective purchasers or other parties in any actual or proposed reorganization, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business, assets or stock.

Aircrewcare may disclose your Personal Information as described above, but only in good faith and for the limited and specified purposes described in this notice.

Aircrewcare will only share your information for marketing purposes outside the Aircrewcare Group where you have consented to marketing. See the Marketing section below for more information.

In the event we share your Personal Information, we will take appropriate measures to protect your privacy and the Personal Information we transfer.

We require all third parties to respect the security of your Personal Information and treat it in accordance with the law. We do not allow our third party service providers to use your Personal Information for their own purposes and we only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

In addition, if we learn that third party is using or disclosing your Personal Information in a manner that is contrary to this Policy, we will take reasonable steps to prevent or stop such use or disclosure. Aircrewcare may be liable for onward transfers of Personal Information to third parties in violation of this Policy and the US Privacy Shield.

International Transfers of Your Personal Information

Due to the global nature of our business, we may transfer Personal Information to parties located in other countries including the European Economic Area (EEA), the United States of America for processing, storage, administration or any other use stated within this policy. We may transfer Personal Information internationally to our group companies, service providers, business partners and governmental, regulatory or public authorities.

When we transfer your Personal Information overseas we ensure a similar degree of protection is afforded to it by ensuring one of the following safeguards:

- We will only transfer your Personal Information to countries that have been deemed by the relevant data protection regulatory bodies to provide an adequate level of protection for personal information
- Where we use certain service providers we may use specific contracts approved by data protection regulatory bodies.
- Where we transfer data to our group companies we require all of our group companies to follow the same rules as Aircrewcare when processing your Personal Information

The purposes and processing associated with any such transfer will comply with all applicable data protection regulations, including, for all EU residents, the EU's General Data Protection Regulation, where we participate in the U.S. Department of Commerce's EU Privacy Shield ("Privacy Shield"). We have certified that we adhere to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability ("the Principles"). We are committed to ensuring that all Personal Information received from the EU in reliance on the Privacy Shield, is subject to the Principles. If there is any conflict between this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern in matters regarding EU residents. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov>.

Marketing and Opting Out

You will receive marketing communications from us if you have requested information from us or obtained insurance products and services from us and in each case you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your Personal Information with any company outside the Aircrewcare group of companies for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us. Where you opt out of receiving these marketing messages this will not apply to Personal Information provided to us as a result of a product or service you have purchased from us, product/service experience or other transactions.

If you no longer wish to be contacted for marketing purposes, please contact info@aircrewcare.com.

Keeping Your Information

Aircrewcare will only process Personal Information in ways that are compatible with the purpose that Aircrewcare collected it for, or for purposes which you might later authorize. We will only keep your information for as long as is necessary and in accordance with any relevant legislation, accounting or reporting requirements.

To determine the appropriate retention period for Personal Information we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Before we use your Personal Information for a purpose that is materially different than the purpose we collected it for or that you later authorized, we will provide you with the opportunity to opt out.

Aircrewcare maintains procedures to help ensure that Personal Information is reliable for its intended use, accurate, complete, and current.

Security

Aircrewcare will take appropriate technical, physical, legal and organizational measures, which are consistent with applicable privacy and data security laws. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any Personal Information you might have with us has been compromised), please immediately notify us. See contact information above.

When Aircrewcare provides Personal Information to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Information.

We will put in place procedures to deal with any suspected Personal Information breaches. We will notify you and any applicable regulator of a breach when we are legally required to do so.

Your Rights

- **Right to access, rectification, and erasure**

You may have the right to access the Personal Information that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed unlawfully. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. If you would like to request access to, correction, amendment, or deletion of your Personal Information, you can submit a written request to the contact information provided above. We may request specific information from you to confirm your identity.

- **Right to restriction of processing**

You have the right to “block” or suppress processing of your personal information in certain circumstances, 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 process your personal information.

- **Right to data portability**

You have the right to data portability in certain circumstances, which allows you to obtain and reuse your personal information for your own purposes across different services thus allowing you to move, copy or transfer your personal information easily from our IT environment to another third party in a safe and secure way.

- **Right to object**

You have the right to object to the processing of your information in certain circumstances including where your information is used for direct marketing and for purposes of scientific/historical research and statistics.

Please see the Marketing section for more information.

- **Right to withdraw consent at any time**

Where you have provided consent to the processing of your information (for example, to the processing of your medical/health information), you have the right to withdraw your consent at any time. If you withdraw your consent we may not be able to provide certain products and services to you.

If you wish to withdraw this consent please email us at info@aircrewcare.com and we will act on this instruction as soon as we can.

- **Right not to be subject to automated-decision making**

As we use systems which make decisions based on automated processing of your information, you have the right to obtain human intervention, express your point of view and to obtain an explanation of the decision and challenge it.

- **Right to lodge a complaint**

You can make any of the requests set out above, or file a complaint about how we have handled your information. Please do not hesitate to contact us using the contact details provided above to ensure that it is resolved without delay. Please note that in some cases we may not be able to comply with a request you have made for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request or complaint you make and if we can't comply with your request, we will tell you why.

In addition, UK residents have the right to lodge a complaint with the UK's Information Supervisory Authority (the Information Commissioner's Officer – "ICO") where you believe that your information has not been processed in accordance with the relevant legislation and regulatory requirements. More information can be found on the ICO's website: <https://ico.org.uk/>

With respect to the Personal Information of EU residents, we verify our compliance with the Privacy Shield and the terms of this Policy by conducting a periodic self-assessment. Any complaint or dispute about how we handle EU Personal Information should be directed to the contact information provided above. If we are unable to reach a mutually satisfactory resolution for such complaint or dispute, we have agreed to cooperate with the dispute resolution procedures administered by the European Data Protection Authorities (DPA). We commit to cooperate with EU DPAs and comply with the advice given by such authorities with regard to human resources data transferred from the EU in the context of any employment relationships. With respect to such EU Personal Information, we are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Under certain limited conditions, by providing notice to us, you may invoke binding arbitration regarding certain residual claims about EU Personal Information before a Privacy Shield Panel. Such procedure is in accordance with the rules established under the Privacy Shield. We are subject to the investigatory and enforcement powers of the FTC for EU Personal Information. We participate in the American Arbitration Association dispute resolution program (www.adr.org)

Use of Aircrewcare Online Services by Children

The Aircrewcare Online Services are not directed to individuals under the age of sixteen (16), and we request that these individuals do not provide Personal Information through the Aircrewcare Online Services.



Bus Insurance Services t/a Aircrewcare

is authorised by AFM (Autoriteit Financiële Markten or Netherlands Authority for Financial Markets)
KvK: 30199527.

Aircrewcare.com

Bus Insurance Services t/a Aircrewcare is authorised by AFM (Autoriteit Financiële Markten or Netherlands Authority for Financial Markets) and regulated by the Central Bank of Ireland for code of conduct with KvK: 30199527.

Changes to This Privacy Policy

We keep our Policy under regular review and we may amend it at any time and will post any updates on our website.

Please take a look at the “LAST UPDATED” date at the top of this Privacy Policy to see when it was last revised.

This privacy policy is effective Oct 28,2021. To view the previous version of this policy, please email info@aircrewcare.com