

CARIBBEAN INSURERS GROUP

Privacy & Data Protection Policy

Updated on May 27, 2021

Introduction

The Caribbean Insurers Group (“us”, “we”, “our”) comprises the following British Virgin Islands companies:

- Caribbean Insurers Ltd.
- Caribbean Insurers (Health) Limited
- Caribbean Insurers Marine Limited
- Caribbean Adjusters Ltd
- Caribbean Financing Services Limited

References to “you” or “your” are to the individual whose personal data is being processed by us such as the insured, beneficiary, claimant or other person involved in a claim or relevant to a policy.

This privacy & data protection policy explains how we collect and process your personal data and how we intend to use your data in providing insurance services.

We are bound by the **Virgin Islands Data Protection Act, 2021** and we are committed to protecting and respecting your privacy.

What type of information do we collect?

In order for us to provide insurance quotes, insurance policies or deal with any claims or complaints, we need to collect and process personal data about you. We act as a **data controller** for the purposes of processing such data.

The types of personal data that are processed may vary depending on the type of the insurance policy and may include:

- [Individual Details](#)

Name, Address, Telephone Number, Email Address, Gender, Marital Status, Date of Birth, Place of Birth, Nationality, Employer, Job Title and Information about Family Members;

- [Identification Details](#)

Government Identification such as Drivers License, Passport, Social Security Number, Work Permit Card, National Identification Card or National Health Insurance Card;

- [Financial Information](#)

Bank Account or Credit Card details, Source of Income or other Financial Information;

- [Risk Details](#)

Personal information about you which we need to collect in order to assess the risk to be insured such as current and previous health conditions, criminal convictions or other sensitive personal data;

- [Policy Information](#)

Specific information to identify the item being insured such as the year, make and model of your vehicle for Auto insurance quotation purposes or the Block, Parcel and Registration Section for Home insurance quotations as examples;

- [Anti-Money Laundering and Anti-Fraud Information](#)

Specialized databases are utilized to determine if there are any sanctions or criminal charges associated with you;

- [Claims Information](#)

Details regarding past and current claims involving you which may include police reports, adjuster reports, criminal convictions or data relating to your health or other personal data.

Where do we collect your personal data?

We may collect your personal data from the following sources:

- from you;
- from your family members, employer or representative;
- other insurance market participants such as brokers;
- anti-fraud databases, court judgments and other databases;
- in the event of a claim, third parties including the others involved in the claim, witnesses, experts, loss adjusters, solicitors, and claims handlers.

Why we need to process your data?

- **Communication**
We may need to use your personal data to communicate with you to provide information on renewals, policy changes and claims processing;
- **Quotation or Policy Inception:**
We may use your personal data in order to establish you as a client, to evaluate the risks to be covered and to calculate the payment of premium. As a result, we may process sensitive personal data, such as health and criminal records, including possible fraud, sanctions, and anti-money laundering checks;
- **Policy Administration:**
We may use your personal data to provide a proper standard of service, which considers your individual needs and circumstances, including communicating with you and sending you updates regarding your insurance policy;
- **Policy Payments**
We may use your personal data to process payments as instructed by you to be applied to your policy premium;
- **Claims Processing:**
We may use your data to manage insurance claims, defend or prosecute legal claims and investigate or prosecute fraud or other criminal activity. In order to provide insurance cover and process insurance claims in certain instances we may need to process sensitive personal data, such as medical reports and criminal convictions;
- **Renewals:**
We may use your data to contact you to renew your insurance policy, to re-evaluate the risks to be covered and to decide the appropriate policy and the appropriate premium. In order to do this, we may need to process sensitive personal data, such as medical reports and criminal convictions;

- **Regulatory**
We may use your data to fulfil regulatory requirements in relation to our database of customers;
- **Crime**
We may use your data to conduct fraud, anti-money laundering or other criminal investigations.

What are the legal requirements?

We must have a legal basis in order to process the personal information we collect. As a result, we rely on one or more of the following legal grounds:

- Performance of a contract to which you are a party;
- Taking of steps at your request with a view of entering into a contract;
- For compliance with any legal or regulatory obligation;
- For protection of your vital interests;
- For the administration of justice.

When the information we process is considered to be sensitive personal data, we must have an additional legal basis being one of the following:

- You have provided your consent for the sensitive personal data to be processed;
- In order to establish, exercise or defend legal rights;
- For the purposes of preventing and detecting unlawful acts;
- There is public interest to use such information.

Who do we share your personal information with?

We may disclose your personal information to the third parties listed below for the purposes described previously. The third parties listed below will only use your personal information under our strict instruction and are under an obligation to ensure appropriate security measures are in place. We do not sell your personal information.

- Insurers, Reinsurers, Brokers, Agents;
- Regulators;

- Professional advisors including doctors, auditors, solicitors, adjusters and surveyors;
- IT service providers;
- Providers of accountancy software;
- Government departments;

As we deal with insurance companies in many different countries, it may be necessary for us to transfer your data outside the Virgin Islands. We will ensure there is an adequate level of data protection safeguards for your personal data at all times.

How long do we keep your personal data?

We comply with the requirement to process data lawfully and to not keep your data for longer than is necessary in relation to the purpose the data is being processed. It will be retained under one or more of the following criteria:

- Insurance Policy – as long as required to fulfil the conditions of the insurance contract;
- Consent – as long as we continue to have your consent;
- Law – as long as required by law;
- Crime – as long as required to allow us to conduct fraud, anti-money laundering and other criminal investigations.

Confidentiality and security

We restrict access to your information to employees who we have determined need it to provide products or services to you. We train our employees to safeguard customer information, and we require them to sign confidentiality and non-disclosure agreements.

We maintain a variety of physical, electronic, and procedural safeguards to protect your information from unauthorized access by third parties. Such safeguards include:

- Access controls and maintaining access logs;
- Minimum password requirements and requiring regular changes to passwords;
- Physical access controls to our offices and filing cabinets;
- Procedures for security management and back-up and recovery and disaster recovery and business continuity plans;
- Use of firewalls and up-to-date virus scanning software and email filtering services;
- Providing regular security, privacy & data protection training for all our employees.

What rights do you have?

Subject to certain conditions under the BVI legislation, you as the data subject have the right to make the following requests:

- Request for us to confirm whether your personal data is being processed by us;
- Request that we update any information that we hold about you that you think is incorrect or incomplete;
- Request confirmation of what information we hold about you, as well as obtaining a copy of such information;
- Request that we delete certain information we hold about you if you believe it is no longer required;
- Request that we restrict the purpose for which we can use your information if you believe such purpose is no longer valid;
- Request to withdraw your consent to personal data processing at any time;
- Request us to stop processing, or not begin processing personal data for the purposes of direct marketing.

In the event you would like to make any of these requests as set out above, please submit a written request to our Data Protection Officer. In order to verify your identification, we will require you to submit the following information with your request:

- Name;
- Address;
- Date of birth;
- Policy number;
- Copy of your photo identification.

Once the request is received and we establish that we do in fact process your data we can confirm to you the following:

- The personal data relating to you that is being or will be processed;
- The purpose for which the personal data is being or will be processed;
- The recipients or classes of recipients to whom the personal data is or may be disclosed;
- Any information available pertaining to the source of the data;

All requests are free of charge, although we reserve the right to charge you a reasonable administrative fee for requests for the provision of personal information or where we believe you are making an excessive number of requests. Wherever possible, we will respond within 30 days from receipt of the request otherwise we will notify you of anticipated timelines ahead of the 30-day deadline. You also have the right to make a complaint to the Information Commissioner if you feel your request is not being handled properly or in a timely manner.

Please note that simply submitting a request doesn't necessarily mean we will be able to fulfil the request in full on every occasion as we are sometimes bound by law which can prevent us from fulfilling some requests in their entirety, but in such an event we will notify you within our response.

External links

Our website may contain hyperlinks to third parties' websites such as our Online Payment facility. Please note that we do not control such websites neither are we responsible for their content or the security policies they follow.

Changes to this privacy policy

We may modify our privacy policy from time to time. The most recent version is always posted at: www.caribbeaninsurers.com

When we make changes, we will revise the date at the top of this Privacy & Data Protection Policy.

If you have privacy or security concerns?

If you have a concern about data protection, privacy or security, please write to us at:

Data Protection Officer
Caribbean Insurers Ltd.
P.O. Box 129
Road Town, Tortola VG1110
British Virgin Islands

or email us at: info@caribbins.com