

# Hokodo Privacy Policy

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## 1. Introduction

The aim of this document is to explain how Hokodo (henceforth referred to as “we” or “us”) will ensure that Personally Identifiable Information (PII) is protected and processed in accordance with the General Data Protection Regulation (GDPR).

We provide business-to-business insurance solutions, which protect transactions between the Insureds (the firms who request or buy insurance from us, the ‘Sellers’) and their customers (their ‘Buyers’). As such, the data we process is mostly that of companies, whereas GDPR applies primarily to the data of individuals. Some notable exceptions are when we process information regarding: i) sole traders, who trade as an individual rather than as a company; ii) the primary contacts at our Insureds; their Buyers and our distribution partners, for whom we may need to process contact information, and iii) individuals associated with these companies on public registers such as directors, officers and shareholders.

## 2. What Personally Identifiable Information does Hokodo hold and process?

The PII we process is differentiated by our relationship with that party.

### Insureds and Buyers

We process data on the Insureds and Buyers, which is required for providing them with insurance quotes or insurance policies, and which may include PII such as:

- Contact details of the individuals with whom we interact to do business, including: address, telephone number, email address and contact history,
- Invoicing history, including: invoice value, Buyer company identity, issue date, due date, paid date etc.,
- Claims history, including the status of any debt collection,
- The names of individuals associated with the company, as obtained from publicly-available sources, as well as any publicly-disclosed court rulings related to those individuals, and
- A credit score, if we have performed a check on the company

Subject to the consent of the Data Subject, contact details may also be used for our own marketing purposes, for example to notify the Insureds of a new product that we think they might be interested in.

### Business partners

We hold and process the contact details of our business partners with whom we interact to do business. We may also contact our business partners for our own marketing purposes.

### Employees and Job Applicants

In order to facilitate the day-to-day running of our business, we hold PII for all our employees, such as: bank details, identification documents, contact details etc. As part of our recruitment process we receive the CVs of job applicants, which include contact details as well as other personal data (eg. date of birth).

### Browser Data

Visitors to our website do not have their PII collected. However, we do process some non-personally identifiable data, such as: IP Addresses, Country / City of origin, Browser (eg. Google Chrome or Safari), Internet Provider (eg. Virgin media), Device type - (eg. Mobile, Tablet, Desktop) and Operating System (eg. Mac OS 10.13.1).

## 3. Lawful basis for processing Personally Identifiable Information

The legal bases upon which we will process and hold PII are:

- Performance of contract: in order to provide insurance or offer a quote, it is necessary for us to be in contact with the Insureds or prospective Insureds and to process data about them (to determine the risk of offering insurance; the premium and the extent of cover).

- Legitimate interest: we process PII of Buyers on this basis for example to: i) characterise the risk profile of the company, ii) conduct collections in cases of non-payment as well as iii) identify and prevent fraud.
- Consent: when marketing to Insureds or business partners, we obtain the active consent of these parties and they are given the clear option to opt out at any time.
- Legal obligation: we may occasionally be compelled to process the PII of parties with whom we interact or share their data with regulatory authorities in order to comply with regulatory or legal requirements, such as for the prevention of money laundering or combating tax fraud.

## 4. Retention period

Unless otherwise instructed, we will retain PII for a reasonable and necessary time taking into account the purposes of the processing and the legal and regulatory requirements. We will always destroy PII within ten years of the termination of a contract.

## 5. Third party transmission

In order to conduct our business, we need to share Personal Data with selected third parties, such as:

- The insurers who underwrite our insurance products, and associated insurance intermediaries (eg. brokers, FSMA registered companies) and reinsurers,
- Debt collection agencies,
- Claims adjusters,
- Legal or regulatory bodies -- where required -- in order to comply with diverse regulations (eg. Financial Conduct Authority regulations), and
- Service providers, such as: IT platforms, payment processing providers, lawyers, other specialised consultants and marketing and communication firms.

Your data may be transferred outside the EEA as part of interactions with these third parties. In such cases, we have safeguards in place including contractual clauses to ensure third parties meet the standards required by EU law.

We strictly limit the disclosure of PII to third parties to that which is required for the fulfilment of the agreed purpose and nothing more.

If you pass us PII regarding another party (for example a Buyer), it is your responsibility to ensure that, where it is necessary to do so, i) you have told the individual who we are and what PII we process (as set out in this Privacy Policy); and ii) you have permission from this individual to pass us their PII (including any sensitive personal data).

## 6. How your Personal Data is protected

Any data held by us is stored encrypted on our servers. Access to your data is only granted to persons for whom it is necessary for the performance of their tasks. These persons are contractually bound to strict professional discretion. We pay particular attention to the protection of your privacy

and employ industry-standard technical and organisational measures against loss, destruction, access and alteration or distribution of PII by unauthorised persons. It should, however, be noted that the processing and transmission of data is inherently subject to security risks.

Our website may contain links to third party sites (eg. social media) whose terms of use do not fall within the scope of this Privacy Policy and should be consulted to find out how they respect your privacy.

## 7. Your rights

In accordance with GDPR, the following rights exist with respect to Personal Data:

- Right to be informed (that PII is being held and what we do with it),
- Right of access (to view your PII),
- Right of rectification (to ask us to change the PII if you believe it is incorrect),
- Right to erasure (to ask us to delete your PII if we no longer need it, if you believe we have obtained the data unlawfully or if you have removed your consent for particular activities),
- Right to restriction (to stop us from doing particular things with your PII),
- Right to portability (to pass the PII on to another party),
- Right to object (to ask for your data not to be used for direct marketing or for “legitimate interests”), and
- Rights related to automatic decision-making, including risk profiling (to have a human review any decision that has been made about you by our risk profiling and pricing algorithms).

Please contact us via [support@hokodo.co](mailto:support@hokodo.co) if you wish to discuss or begin the process of exercise of any of the above rights.

## 8. Modification of this Privacy Policy

We may adapt this Privacy Policy at any time, and the changes will be applicable at the time of publication on our website. We therefore advise you to consult the most recent version of this document.

**Hokodo Services Limited is an Appointed Representative of Innovative Risk Limited, a firm authorised and regulated by the Financial Conduct Authority.**