

Ki Privacy Notice – quick read

This page explains, in plain language, the key points of how Ki Insurance (“Ki”, “we”, “us”) uses your personal data. It is only a summary – please read the full notice that follows for the details.

Question	Short answer
Who is responsible for my data?	Ki Digital Services Limited (KGSL) is the <i>controller</i> for data collected through ki-insurance.com and the Ki underwriting platform.
What kinds of personal data?	<ul style="list-style-type: none">• Identity & contact details• Business & role information• Login credentials & security tokens• Usage & technical data (IP, device, browser)• Chat/support correspondence• Underwriting selections you make in the Platform.
Why do you need it?	To run our website, provide the Platform, place risks, comply with law, secure the service and – if you agree – send you invites and insights.
Legal basis?	<ul style="list-style-type: none">• Contract• Legitimate interests• Legal obligation• Consent (for marketing & optional cookies).
Who sees it?	Cloud & security providers, analytics & support providers, Lloyd’s market participants, regulators and professional advisers – we never sell your data.
Where is it stored?	Mainly in the UK/EU, but some suppliers are in the US. We protect transfers with IDTAs or the UK Addendum to the SCCs or review for appropriate control measures like BCRs and privacy controls.

Question	Short answer
How long?	Active account + 7 years (or longer if needed for legal claims).
Your rights	<ul style="list-style-type: none"> • Access • Rectify • Erase • Restrict • Port • Object • Withdraw consent • Complain to the ICO (or your local EEA regulator).
Questions?	Email privacy@ki-insurance.com or write to: Data Protection Lead, Ki Insurance, The Leadenhall Building, 122 Leadenhall St, London EC3V 4AB.

Ki Privacy Notice (full version)

Last updated: 26 August 2025

1 Who we are

Ki Digital Services Limited (KGSL) (company no. 13786749) of The Leadenhall Building, 122 Leadenhall St, London EC3V 4AB (“Ki”, “we”, “us”) operates ki-insurance.com and the Ki underwriting platform (the Platform). We are registered with the Information Commissioner’s Office (ICO) under number ZB835565.

We have appointed a Data Protection Lead (DPL): privacy@ki-insurance.com.

We may share your personal data with other companies within the Ki Group Services Limited (the “Ki Group”, meaning Ki Financial Limited and the subsidiary undertakings of Ki Financial Limited together with any entity that becomes a subsidiary undertaking (as defined by section 1162 of the Companies Act 2006) of Ki Financial Limited from time to time) for the purposes set out in this notice, with those companies acting as independent controllers or as processors on our behalf, as applicable.

2 What this notice covers

This notice explains how we collect and use personal data when you:

- browse ki-insurance.com (the “Website”);

- register for or log into the Platform at app.ki-insurance.com/login;
- represent a managing agent, insurer, broker or cover-holder that uses the Platform; or
- correspond with us in any way (e-mail, phone, chat).

Separate notices apply to policyholders, claimants and job applicants.

3 The data we collect

Category	Typical examples	Source
Identity & Contact	name, work e-mail, phone, employer, job title	you / your employer
Account & Security	username, hashed password, MFA token, user role	you
Technical	IP address, device ID, browser type, operating system, cookie IDs	automatic
Usage	page views, clicks, search queries, transaction time-stamps	automatic
Correspondence	Intercom chats, support tickets, e-mails, call notes	you
Underwriting Inputs	capacity selections, risk-rating parameters you enter	you

We do not knowingly collect children's data or special-category data via the Website or Platform.

4 How we collect data

1. Direct – information you enter in forms, chats or e-mails.
2. Automated – cookies, SDKs and log files (see Cookie Policy).
3. From your organisation – when an admin creates or updates your user account.

5 Why we use your data & our legal bases

Purpose	Lawful basis (UK GDPR art. 6)	Key legitimate interests
Operate, administer and secure the Platform	Contract (b)	—

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Detect bots, fraud & abuse (Cloudflare, Auth0 Device IDs)	Legitimate interest (f)	Keep Platform and market participants safe
Provide real-time live-chat support (Intercom)	Legitimate interest (f)	Efficient customer support
Measure features & improve UX (Mixpanel analytics)	Legitimate interest (f) or Consent (a)	Service improvement based on anonymised usage patterns
Comply with FCA, Lloyd's, HMRC regulations and sanctions rules	Legal obligation (c)	—
Send optional marketing, event invites & white-papers	Consent (a)	—

When we rely on legitimate interests we have balanced them against your fundamental rights, in accordance with the ICO's LIA guidance, and determined that they are not overridden.

6 Cookies & similar tech

We only set Strictly Necessary cookies by default. Functional & Analytics cookies load *only* after you give consent in our banner or settings centre. Details are in our [Cookie Policy](#).

7 Who we share data with

Recipient	Relationship	Safeguards
GCP and MS Azure (EU regions)	Cloud hosting processor	UK GDPR art. 28 DPA
Auth0 – Okta	Identity & access management	SCCs/IDTA for US storage
Google Cloud CDN, Cloudflare	DDoS & bot mitigation	SCCs/IDTA
Intercom	Support & product tours	SCCs/IDTA
Mixpanel	Product analytics	SCCs/IDTA
Lloyd's market participants	Co-insurance & compliance	UK GDPR art. 26 arrangement
Regulators & authorities	FCA, HMRC, ICO, courts	Legal obligation

Recipient	Relationship	Safeguards
Professional advisers	Product advertising	SCCs/IDTA, review of appropriate control measures

We never sell, rent or monetise your data.

8 International transfers

Some processors store data in the United States. Where this happens we rely on:

- the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU SCCs;
- robust technical measures such as encryption in transit & at rest; and
- transfer impact assessments (TIAs) updated annually.

You can request details of the relevant safeguards by contacting the DPO.

9 Automated decision-making & profiling

Machine-learning models calculate indicative risk-pricing displayed in the Platform. The models act on risk parameters only – they are not used to take decisions about natural persons. You can request human review of any automated output.

10 Marketing communications

We will only send you newsletters or event invitations if you explicitly opt in, and you can unsubscribe at any time via the link in each e-mail or by emailing privacy@ki-insurance.com. Choosing not to receive marketing does not affect your Platform access.

11 Data security

We apply ISO 27001-aligned controls, including:

- TLS 1.3 encryption in transit and AES-256 at rest;
- least-privilege IAM & quarterly access reviews;
- multi-factor authentication for all staff & users;
- continuous vulnerability scanning & annual penetration tests.

12 Data retention

Data set	Standard period	Rationale
Platform account & audit logs	Life of account + 7 y	FCA/Lloyd's record-keeping
Support tickets & chats	Resolution + 3 y	Evidence of service quality

Data set	Standard period	Rationale
Analytics events	+ 3 y analytics period	ICO guidance on proportionality
Marketing consents & opt-outs	Consent withdrawal + 7 y	PECR compliance
Contracts & invoices	Contract end + 7 y	HMRC tax rules

In exceptional cases (e.g. litigation hold or fraud prevention) we may keep data longer.

13 Your rights

You can exercise the following rights at any time:

1. Access – obtain a copy of your data.
2. Rectification – correct inaccurate data.
3. Erasure – request deletion where data is no longer needed.
4. Restriction – ask us to stop using your data while we resolve an issue.
5. Portability – receive data you provided in CSV/JSON.
6. Objection – object to processing based on legitimate interests.
7. Withdraw consent – opt out of marketing or analytics at any time.

Email privacy@ki-insurance.com or use the in-Platform “Privacy request” form. We respond within one month (extendable to 3 months for complex requests). You can also complain to the ICO (ico.org.uk) or, if you are in the EEA, to your local supervisory authority.

14 Complaints & contact

If you have concerns about our use of your data, please contact the DPL first. If we cannot resolve your issue, you have the right to complain to the ICO (UK) or your local EEA regulator.

Data Protection Lead

Ki Insurance, The Leadenhall Building, 122 Leadenhall St, London EC3V 4AB
privacy@ki-insurance.com |

15 Changes to this notice

We may update this notice from time to time. When we make material changes we will highlight them on the Website and notify registered users by e-mail. The version and date at the top of the page tell you when it was last reviewed.