

# Ki Privacy Notice & Cookie Policy

## Introduction

Welcome to the Ki's privacy notice.

Ki respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Separately, we handle the data of those whom we insure using the processes set out at <https://www.britisurance.com/privacy>.

## 1. Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how Ki collects and processes your personal data through your use of this website, including any data you may provide through this website. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and policies and is not intended to override them.

### Controller

Brit Group Services Limited (BGSL) is the controller and responsible for your personal data. BGSL is collectively referred to as "Ki", "we", "us" or "our" in this privacy notice.

We have appointed a data privacy officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy officer using the details set out below.

### Contact details

If you have any questions about this privacy notice or our privacy practices, please contact our data protection officer in the following ways:

Full name of legal entity: Brit Group Services Limited

Data protection officer: Tim Harmer - [Tim.Harmer@britinsurance.com](mailto:Tim.Harmer@britinsurance.com)

Postal address: The Leadenhall Building, 122 Leadenhall St, Lime Street, London EC3V 4AB

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### Third-party links

This website includes some links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The data we collect about you

'Personal Data', or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes; first name, surname, last name, company.
- Contact Data includes; email address.
- Technical Data includes; internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Usage Data includes; information about how you use our website, products and services.
- We do not take or store any of your financial information such as credit card details.

We also collect, use and share 'Aggregated Data' such as statistical for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any 'Special Categories' of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 3. How is your Personal Data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Contact Data by filling in forms or by corresponding with us by email or otherwise. This includes Personal Data you provide when you:
  - o register for information or updates from Ki;
  - o create an account on our website;
  - o subscribe to our service;
  - o give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy (below) for further details.

Technical Data from the following parties:

- analytics providers such as Google Analytics, HotJar or Mixpanel
- search information providers such as Google
- chat functionality such as Intercom

## 4. How we use your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal obligation.

### Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(d) Usage (e) Marketing Communications (f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

### Opting out

You can ask us to stop sending you marketing messages at any time by logging into the website and by following the opt-out link included within the website footer.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of product/service experience or other interactions with Ki.

### Cookies

Like most websites and apps, we use cookies. By using the Ki website you agree to our use of cookies. You can view all the cookies we use on your internet browser or you can get in touch if you have any questions. Cookies never hold any personally identifiable data and are used to: track and analyse behaviour or remember preferences you've set. They can also be used to show you specific adverts when you're on other, non-Ki owned, websites. You can turn off cookies in your browser settings. Try searching in your 'Help' section, or have a look at <http://www.aboutcookies.org> You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie policy.

### The Cookies that Ki Uses

By using the Ki website, you agree that we can place cookies on your device as described below:

Cookie Name	Purpose	Expiry
<b>Intercom (Essential Cookies)</b>		
intercom-id	Anonymous visitor identifier cookie. As people visit your site they get this cookie.	9 months
intercom-session	Identifier for each unique browser session. This session cookie is refreshed on each successful logged-in ping, extending it to 1 week from that moment. The user can access their conversations and have data communicated on logged out pages for 1 week, as long as the session isn't	1 week

	intentionally terminated with `Intercom ('shutdown')`, which usually happens on logout.	
<b>Google Analytics (Analytics Cookies)</b>		
_ <b>ga</b>	Used to distinguish users.	2 years
_ <b>gid</b>	Used to distinguish users.	24 hours
_ <b>gat</b>	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named <code>_dc_gtm_G-JS11TMP7GY</code> .	1 minute
<b>AMP_TOKEN</b>	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.	30 seconds to 1 year
_ <b>gac_G-JS11TMP7GY</b>	Contains campaign related information for the user. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out.	90 days
<b>Hotjar (Analytics Cookies)</b>		
_ <b>hjid</b>	Hotjar cookie that is set when the customer first lands on a page with the Hotjar script. It is used to persist the Hotjar User ID, unique to that site on the browser. This ensures that behaviour in subsequent visits to the same site will be attributed to the same user ID.	365 days
_ <b>hjRecordingLastActivity</b>	This should be found in session storage (as opposed to cookies). This gets updated when a visitor recording starts and when data is sent through the WebSocket (the visitor performs an action that Hotjar records).	365 days

_hjTLDDTest	When the Hotjar script executes we try to determine the most generic cookie path we should use, instead of the page hostname. This is done so that cookies can be shared across subdomains (where applicable). To determine this, we try to store the _hjTLDDTest cookie for different URL substring alternatives until it fails. After this check, the cookie is removed.	Session
_hjLocalStorageTest	This cookie is used to check if the Hotjar Tracking Script can use local storage. If it can, a value of 1 is set in this cookie. The data stored in _hjLocalStorageTest has no expiration time, but it is deleted almost immediately after it is created.	Under 100ms
_hjIncludedInPageviewSample	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's pageview limit.	30 minutes
_hjIncludedInSessionSample	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's daily session limit.	30 minutes
_hjAbsoluteSessionInProgress	This cookie is used to detect the first pageview session of a user. This is a True/False flag set by the cookie.	30 minutes
<b>Mixpanel (Analytics Cookies)</b>		
_mp_da555ea04cfb68c92fe4fd579c5b515e_mixpanel	Used to distinguish users in Mixpanel.	One year

#### Use of third-party data providers

Ki rely on third parties to increase the amount of data available to the Ki Algorithm. This includes geocoding using addresses provided from the Schedule using the Google Maps APIs. Google's Privacy Policy can be found [here](#).

## Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Disclosures of your Personal Data

We may disclose your personal data to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy notice.

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

## 6. International transfers

We may transfer or share your data outside the UK or the European Economic Area. We will always take steps to ensure your data is treated and transferred securely with appropriate safeguards and controls in place.

## 7. Data security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

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

## 8. Data retention

How long will you use my Personal Data for?

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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

By law we have to keep basic information about our customers (including Contact, Identity, and Transaction Data) for six years after they cease being customers for legal purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data.

If you wish to exercise any of the rights set out above, please contact us at [hello@ki-insurance.com](mailto:hello@ki-insurance.com)

No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

'Legitimate Interest' means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our Legitimate Interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our Legitimate Interests against any potential impact on you in respect of specific activities by contacting us.

'Performance of Contract' means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

'Comply with a legal obligation' means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

Your legal rights

You have the right to:

Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where



we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time following your request.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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