

Telematics Privacy Notice

SWAN General Ltd, (“SWAN”) is committed to protecting and respecting your privacy.

Scope

This privacy policy (“Privacy Policy”) together with our Mobile App License Agreement, and any other documents referred to therein, sets out the basis on which SWAN collects personal data from users, or which users provide, when using the SWAN app (the “App”) and how such personal data will be stored, processed or shared by SWAN. Please read the following carefully to understand our views and practices regarding your personal data and how SWAN will treat it. By registering to use the App, clicking the relevant tick boxes prior to installing the App and then using the App, you agree to the practices described in this Privacy Policy.

Who are we?

We are Swan General Ltd (“SWAN”, “we”, “us” or “our”), one of the largest insurance company in Mauritius, whose principal activity is to underwrite short term insurance business.

You should also read the Privacy Notice provided with your motor insurance policy documents, as it explains how we will use the information that you provide us and that we collect from you. You can find information on your rights, how to contact us and make a complaint in this notice.

Guiding Privacy Principles

- SWAN only collects and maintains the minimum amount of data necessary to provide the services SWAN offers
- SWAN does not sell any customer information
- SWAN does not share customer information with third parties unless expressly authorized by the customer – and then only as part of providing SWAN’s services, or required by law
- SWAN handles all collected data in the same uniform fashion – for prospective, current or former customers
- SWAN maintains physical, procedural and technological controls to protect customer information and to comply with privacy laws and regulations.

Information we collect

When you use the App, SWAN will collect information about your driving style and habits, such as acceleration, braking, speeding and cornering, amongst others. Collection and use of this information are based upon you giving explicit consent to this profiling when registering to use the App.

Once activated the telematics device will record and analyse data about your driving behaviour or anyone who drives your car. This information will be used to build up a profile of how your car is being driven. This information will be combined to form a driving score based on your driving behaviour.

SWAN will not collect personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person.

How we use the data collected from the telematics device?

We will use the data from the telematics device, for the purpose of assessing individuals' driving behaviour and to provide insurance policies which are reflective of driving behaviour among other rating factors.

We will use the information we collect through our telematics device:

- To profile and analyze the driving habits of users and create a personalized driving score for each user;
- To create aggregated statistics on all users of the App;
- To administer our App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To inform you about new features;
- To improve our App to ensure that content is presented in the most effective manner for you;
- To allow you to participate in interactive features of the App;
- As part of our efforts to keep our App safe and secure;

Your data may be used for the following purposes:

- To help us to understand safe driving behaviours, which we will use to develop underwriting of our motor insurance policies and to inform our development of similar products, services and systems;
- To help us deploy emergency services in the event of an accident;
- Subject to prior notice from SWAN and to your consent, to tailor your premium at renewal;

How our suppliers use your data and the telematics data?

When you give us your information, it will be shared with our Technology Supplier(s) and Analytics Supplier, Cambridge Mobile Telematics. ("CMT") whose principal place of business is, 101 Main Street, 14th Floor Cambridge, Massachusetts, United States of America 02142

Information collected by the telematics device will be used by our analytics suppliers for research and analytical purposes, both during and after your subscription period. Any information that our analytics supplier shares with third parties will be made anonymous and will not contain any of your personal information. This will prevent data or results being directly linked to you.

When do we use computers to make decisions about you?

Information recorded from your telematics device will be assessed automatically to generate your driving score. The driving score will be assessed against our internal models of driver behaviour to generate a driving score. This score can be accessed via your telematics portal.

Subject to prior notice from SWAN and to your consent, the driving score may be used to manage your motor insurance policy.