



PRIVACY POLICY

Mayfair's Privacy Statement

Mayfair Insurance Company Limited respects your privacy and is committed to protecting your personal and private information.

We recognize that when you choose to provide us with your personal information, you trust us to act with the highest level of responsibility to handle and safeguard that information and in this regard, we endure to lawfully, fairly and transparently express how we shall your personal data through this privacy policy.

This privacy statement will help describe to you how Mayfair Insurance collects, uses and processes your personal information through use of our website <https://ke.mayfairinsurance.africa/> and any products or services offered to you by Mayfair Insurance.

The policy is pursuant to with the Data Protection Act of 2019, which became effective on the 11th November 2019

Why We Collect Personal Information

Mayfair Insurance collects information to allow us serve you in the best possible way and to ensure that your needs are met through use of our products and services.

What Personal Information We Collect

The information Mayfair Insurance collects includes but is not limited to the following:

- General identification such as name, gender, date of birth, marital status, profession.
- Contact information such as postal address, email address, telephone number.
- Data submitted or made as part of the insurance issuance and claim process such as video, photographic images or audio recordings
- Sensitive data such as claim record, past claim experience available, country of origin, religion
- Government issued documents such as IDs, passports, PIN numbers, driving licenses, car registration.
- Financial information such as bank accounts and account history, credit scores and history, assets.
- Online information through use and visit to our websites
- Social media data such as profile data when you interact with our social media sites
- Information from other sources such as publicly available information from social media services and sources made commercially available

How We Collect Personal Information

Mayfair Insurance collects information in the following ways:

1. Using information, you have consented to give us through:
 - Engaging with our website and software applications availed by us through mobile devices and computers and also through interaction with our social media pages.
 - By direct submission of insurance application forms, claim forms, email communication and other forms of communication in your dealings with us.

2. Using information obtained from other sources through third parties by submission of your information to approved insurance intermediaries such as:
 - Brokers
 - Agents
 - Persons acting on your behalf

We may also obtain information obtained from the below third parties/service providers:

- Insurance investigators
 - Claim investigators
 - Courier services
 - Re-insurance companies
 - Advocates
 - Travel insurance agents
 - and any other third parties involved in your business relationship with us.
3. Using information indirectly received:
 - Where the data is contained in a public record
 - Where you have deliberately made the data public
 - Where you have consented to the collection from another source
 - Where the collection from another source would not prejudice your interests
 4. We may find it necessary to collect information from another source where it is needed for:
 - The prevention, detection, investigation, prosecution and punishment of crime
 - The enforcement of a law which imposes a pecuniary penalty
 - The protection of your interests or another person
 5. Using information from automated technologies e.g., cookies. Cookies are text files with small pieces of data that are used to identify your computer as you visit our website. We use these cookies and similar technologies to recognize you on subsequent visits and to allow our website to remember you. We may use information obtained from cookies for the following purposes:
 - To help you move around the website and use its features. The cookies assist you to receive the services you have requested for effectively.
 - To allow the website remember choices you make and preferences you have to give you better functionality and personal features
 - To have a visual insight on trends and website traffic to analyze the use of our website
 - To help us improve the efficiency, effectiveness and user-friendliness of our website and understand how effective our adverts are.
 6. We may also collect your information through business referrals and you attending events organized or partnered by us where our marketing members may collect documents and/or information from you and convey the same to the company for processing of your insurance policy /claim where it is deemed necessary.

The data collected shall be used and processed for the intended purpose. If the data collection results and it being used for commercial purpose, the same will be done in as per the guidelines in the Data Protection Act 2019.

How We Use The Personal Information Collected

Mayfair Insurance uses your personal information as summarized below.

Purpose	Lawful Basis
To Manage Our Client Engagements – We use your personal information to communicate with you, to address your queries, requests and complaints as well as to administer customer service.	<ul style="list-style-type: none"> • Performance of the contract - we use your personal information to help us better serve you with our products and services and to fulfill our obligation in relation to the contract • Consent from you - we only use your personal information for the specific purpose you have asked us to do so. Your consent may be withdrawn at any time
To Carry Out Regulatory and Compliance Obligations – We may process your personal information to fulfil necessary obligations such as those for “Know Your Customer” (KYC) and the Anti-Money Laundering	<ul style="list-style-type: none"> • Legal obligation – where we are required by law to collect your personal information to meet the legal requirements • Performance of the contract - we use your personal information to help us better serve you with our products and services and to fulfill our obligation in relation to the contract • Legitimate interests – To assist us in providing professional services, operating our business and bettering our services • Prevention of Fraud – To detect and avoid possible criminal acts
To Administer Claims – We may use your personal information for the validation and processing of your claims	<ul style="list-style-type: none"> • Performance of the contract - we use your personal information to help us better serve you with our products and services and to fulfill our obligation in relation to the contract • Prevention of Fraud – To detect and avoid possible criminal acts
For Process & Service Improvement – personal information is used to ensure that we understand how we can better improve both our services and how we go about our processes in relation to our clients’ needs and requests	<ul style="list-style-type: none"> • Legitimate interests – To assist us in providing professional services, operating our business and bettering our services
For marketing purposes – we may provide you with information on our products and services	<ul style="list-style-type: none"> • Legitimate interests – To assist us in providing professional services, operating our business and bettering our services

How We Share The Personal Information Collected

Your Personal Data may be disclosed to any of the following and for any/one of the purposes mentioned above:

- Mayfair Insurance use branches to manage its operations and due to this, authorized persons working in our branch network may come into contact with your data.
- Independent contractors, third party service providers Professional advisers and agents providing services to Mayfair Insurance.
- Our reinsurance partners
- Regulatory Authorities e.g., Insurance regulatory Authority (IRA), Governmental Authority e.g., Kenya Revenue Authority (KRA), Legal Authority e.g., law courts
- Persons in connection with any legal proceedings, to obtain legal advice as well as in relation to exercising /defending any legal rights.
- Entities that conduct background checks e.g., credit bureau or credit reference agency any criminal records bureau (CRB) e.g., Directorate of Criminal Investigations (DCI)
- Third parties to provide references but only with your consent /at your request
- Persons who may be required by Law and/or Regulation for disclosure to be given
- Third parties to whom we may transfer our rights and/or obligations under any agreement e.g., a merger, acquisition or takeover

How Long We Retain The Personal Information Collected

- Mayfair Insurance may retain your personal information for as long as may be reasonably necessary to satisfy the intended purpose for which it was collected. We may also keep your personal information for a longer retention period as permitted or required by law and also as consented by you.
- Your personal information will be securely destroyed when it is no longer required and also as per your request and in a manner as may be specified at the expiry of the retention period.
- We may also retain your contact information for the purposes of invitations to you for insurance renewals every now and then.
- Your contact information may also be used to send you notifications that inform you of our renewal notices and claim updates. You may however withdraw your consent from receiving these notifications

Processing Personal Data of Minors

Mayfair Insurance shall process data in relation to children only on the below conditions:

- When we receive consent from the child's parent or guardian
- When the processing is in such a manner that protects and advances the rights and best interests of the child

We shall incorporate the necessary measures to ensure mechanisms are in place to validate age verification and consent. Mayfair Insurance shall endure to process the data in strict accordance with the Data Protection Act of 2019.

Rights Regarding Your Data

Under this privacy policy and in relation to certain circumstances, you have the below rights:

- Right to access the information Mayfair Insurance has in relation to you.
- Right of rectification - you have the right to request us to alter/change/correct any information we have in relation to you that may be incorrect or outdated
- Right to erasure (right to be forgotten)– you have the right to have your personal information deleted; the information may be deleted where we have no other obligation to process it and where it is no longer necessary to use your information for the initial purpose
- Right to withdraw consent: where the lawful basis relied upon by the company is your consent, the right to withdraw such consent at any time without having to explain why
- Right to be informed: the right to be provided with certain information about how we collect and process your personal data
- Right to restrict the processing of your personal information further. This could be the case where its accuracy is in dispute, and it may not be processed until its accuracy is in order. We take just steps to ensure that the personal information we hold about you is accurate and complete.
- Right to data portability - where we may provide your information to you or another data controller in a structured, commonly used and machine-readable format. The processing of the information is however on condition that your consent is given, it is aimed at satisfying the performance of a contract of which you are part of, and it doesn't infringe on the rights and freedom of others. We are to comply with your data portability requests, free of charge and within a period of one month. This period may be extended for a further two months where data portability requests are complex or numerous. Once your data is transferred, the other party will now be responsible for the care of your personal information.
- Right to objecting to processing – you have the right to oppose the processing of your personal information at any given time. This objection is however subject to us as Mayfair Insurance demonstrating compelling legitimate grounds for the processing which override your interests, rights and freedoms
- Right to object to direct marketing – direct marketing is the communication of any advertising or marketing material which is directed towards you. Where your data is used for this purpose, you have the right to object the use of your information. Upon your request, your information will no longer be used for this purpose. it is however not in our practice to provide direct marketing to insurance policyholders.
- Right to object automated individual decision making – this relates to decisions based on automated processing using your personal information. Any automated processing of personal data intended to evaluate certain personal aspects relating you shall not be based on sensitive categories of your personal data.
- Right to complain - If you have concerns in relation to the way Mayfair Insurance processes your personal data, you can either contact us by writing or email under info@mayfair.co.ke.

Access and Changes To Your Personal Data

In regard to your right to access your data, you may request us to provide you with the personal data we hold on you. This can be done by filling our personal data request form and submitting it to us either

physically at any of our branches or via email info@mayfair.co.ke. We shall commit to reverting to your request within one month of receipt of the request.

In regard to your right to rectification and in the event where the personal data we hold on you /part of it is incorrect or incomplete, you may wish to have the data amended/completed accordingly. This can be done by filling our personal data amendment form and attaching the necessary documentation. Once done, you should submit the subject form to us either physically at any of our branches or via email. We shall endeavor to revert to your request within one month of receipt of the request.

In accordance with the country's privacy and data protection laws, please note that some Personal Data may be exempt from access, correction, objection or deletion.

Consent and What You Need To Know About It

By using our website, services and our products, you agree to be bound by this statement of privacy.

If you find this statement agreeable on behalf of/as a representative of an entity, you represent and warrant that you have the authority to bind that entity to our privacy statement, by using our products and/or accessing our site, if you do not accept it in entirety, you must inform us immediately indicating what part of our privacy statement you are not agreeable to.

By providing your personal information or personal information of someone included in your policy to Mayfair Insurance, you acknowledge that we may use it only in the ways set out in this Privacy statement as well as in the Data Protection Act.

Withdrawal of Consent

We may ask for your consent for certain uses of your personal information. In the instances that we do this, you have the right to withdraw your consent to further use of your personal information.

Withdrawal of consent, however, may not discredit/refute any processing we carried out prior to you withdrawing your consent. Also, please be advised that in certain circumstances, we may not be able to process your insurance if you withdraw your consent.

Mayfair Insurance does not solely rely on consent for processing personal information; our reliance is mainly on other legal bases such as where it is necessary for the performance of a contract to which you are a party to and where we have Legitimate interests

Marketing Communications

Mayfair Insurance may from time to time use your information to notify you about our products and services that may be of interest to you. We may relay this communication via email or telephone.

If you do not wish to be receiving these information updates in this manner, you may opt-out by clicking on the link to "Do Not Consent" on the email or by contacting us via email or branches.

We shall endeavor to comply with your opt-out request(s) as soon as possible.

Security Safeguards Of Personal Information

Mayfair Insurance is dedicated to ensuring that your personal data is handled carefully and secured safely. We have put in place the necessary measures i.e., legal, organizational, physical, technical, which

are consistent with applicable data privacy security laws to ensure your data is protected from unauthorized access, theft, security breaches, loss, modification or loss.

If we happen to suspect that your data has been breached, accessed without authority, transferred to a third party irregularly or your information has been compromised, we shall notify you on the same.

You should be aware that the Internet is not a secure form of communication and sending and receiving information over the Internet carries with it risks including the risk of access and interference by unauthorized third parties. We do not accept responsibility or liability for the confidentiality, security or integrity of your Personal Data in connection with its transmission over the Internet.

Where You Can Find Our Privacy Policy

This document is available on our website <https://ke.mayfairinsurance.africa/> and you may view it whenever you wish to be informed on how we collect and treat your personal data. A copy of the privacy policy may also be provided to you together with our policy documents

Updates To Our Privacy Policy

Mayfair Insurance reserves the right to amend this privacy policy at any time and we shall regularly review the policy as we see fit. Once revised or altered, we shall inform you by indicating the latest date it was updated.

How You May Reach Us

Incase of any query on the privacy policy, you may reach us on any of the below:

HEAD OFFICE - NAIROBI

 0724 / 733 256925

 info@mayfair.co.ke

8th Floor | Mayfair Centre

Ralph Bunche Road | Nairobi | Kenya

P. O. Box 45161- 00100

MOMBASA OFFICE

 0715 583 003, 0733 347 354

 msa@mayfair.co.ke

Ground Floor | Mayfair House

Junction of New Nyali Road & Silo Road

P.O. Box 95986 – 80106

ELDORET OFFICE

 053 20 32741, 32742

 eldoret@mayfair.co.ke

2nd floor | Rupa's Mall

Uganda Road | Eldoret

P.O. Box 9044 – 30100