

This Privacy Notice is related to the collection, use, processing and sharing of your personal data, including sensitive personal data, by any member of gig-Bahrain.

The Data Manager of your personal data is Bahrain Kuwait Insurance Company (BKIC or gig-Bahrain) you have or may have a relationship with. Gig-Bahrain is committed to ensuring that your personal data is protected under Bahrain Personal Data Protection Law (PDPL) (Act No. 30 of 2018).

1. DETAILS ON HOW WE COLLECT YOUR PERSONAL DATA

1. gig-Bahrain collects your personal data directly from you via different communication channels such as emails, phone calls, face-to-face meetings or online when you request for proposal, throughout the issuance of insurance policy, during registration process and completion of application forms, in the payment process, and during your engagement with gig-Bahrain to provide you with services
2. gig-Bahrain also collects your personal data indirectly from:
 - a. Internet, social media, public records, brokers and agents, Third Party Administrators (“TPAs”), hospitals, Social Insurance Organisation (GOSI) and Third party service providers.
 - b. Banks for Decreasing Terms and Credit Life policies
 - c. Human Resources Department of Corporate Companies for issuing Group Life policy
3. For third-party claims, gig-Bahrain may collect your personal data form other insurance companies, garages, lawyers, and courts.

2. THE LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA

gig-Bahrain only processes your personal data including sensitive personal data based on one or more of following lawful basis under Bahrain PDPL:

Purpose	Lawful Basis
Fulfil obligations arising from contract agreements and policies between you and gig-Bahrain mostly for the provision of our services such as underwriting insurance policy, amendments, cancelations or renewals to policies, opening of account, selling or disposing salvage, road side assist and replacement vehicles.	Contractual obligations
Process payment transactions and online payments	Legal obligations
Claims opening, processing, settlement & recoveries	Legal obligations Contractual obligations
Carry out due diligence activities by performing Know Your Customer (KYC) verification	Legal obligations
Monitoring through CCTV cameras for the safety and security of individuals and assets	Legitimate Interests Data Owner Consent
Providing access to gig-Bahrain facilities and assets through access cards	Legitimate Interests Data Owner Consent
Initiating and following-up on any complaint, lawsuit, and criminal proceedings between you and gig-Bahrain and coordination with external lawyers to manage court cases	Legal Obligations Contractual Obligations
Obtain confirmation from GOSI for any outstanding claim for the insured to ensure no duplication of indemnity	Legal Obligations Contractual Obligations
Online backups, restoration of backups and provide storage and maintenance of all data	Legitimate Interests
gig-Bahrain systems’ support and maintenance activities	Legitimate Interests Data Owner Consent
Perform technical assessments and testing of IT systems security	Legitimate Interests Data Owner Consent
Store your contact details electronically in our records	Contractual Obligations Legitimate Interests

Purpose	Lawful Basis
Share your details with reinsurers to share the risk and premiums	Data Owner Consent Legitimate interests
Determine the premium rating and claims reserves and assess the risk	Contractual obligations Legitimate interests
For Medical and Life insurance: Provide you with regular reports, and annual assessment on share of risk with respect to insurance and premium received	Contractual obligation
Social media and market research	Legitimate interest Data Owner Consent
Send you notifications for renewals, new branches opening, or release of new products	Legitimate interest Data Owner Consent
Upload your motor insurance details to the E-gov website	Legal obligations
Handle enquiries about policies and online business and ensure satisfaction	Contractual obligations Data Owner Consent
Maintain the relationship with you as existing customer and provide you with advice about our insurance products and services.	Legitimate interest Data Owner Consent
Comply with gig-Bahrain internal policies and procedures	Contractual Obligations Legitimate Interests

3. AUTOMATED DECISION MAKING AND PROFILING

gig-Bahrain may take decisions based on automated processing of personal data including profiling of an individual or group for the following processes:

1. Actuarial Unit department may determine the premium and claims reserves and assess the risks.
2. Medical department may perform profiling of data based on:
 - a. Age and gender (Age band & Gender premium rates) to calculate the premium for the purpose of policy underwriting, endorsement or cancelation, or for reinsurance arrangements.
 - b. Gender and nationality for further analysis of claims.
3. Life department may perform profiling based on job designation to calculate the premium rates for the purpose of underwriting Group Life policy and reinsurance arrangements.
4. Motor Underwriting department may perform profiling based on age to provide gig-Bahrain's Management with reports on customers with specific age range have done accidents
5. Motor Claims department may perform profiling based on age group and age of driving license group for the purpose of claim opening, processing, settlement and recoveries.
6. Corporate Communications department may perform profiling as a follower on gig-Bahrain's social media accounts to calculate the total number of customers based on the region, gender and age grouping of followers visiting the profile.

4. TYPES OF PERSONAL DATA WE PROCESS

Based on the above specified lawful reasons of processing your personal data, gig-Bahrain may handle and process your:

1. Identity details: full name, contact details including telephone numbers and email addresses, gender, marital status, family details, job title(s), location of birth, photograph, video, relationship to the policyholder, beneficiary or claimant.
2. Address details: residential address, employer address, correspondence address.
3. Identification details: identification numbers issued by government bodies (for example: CPR, passport copy, driver's license number, other government-issued identity number).
4. Financial information: bank account information, income and other financial information.
5. Insured risk: details about the insured risks which may include some personal data such as health data, criminal records data, and other special demographic and data categories.
6. Policy information: details about the insurance quotes and policies.
7. Anti-fraud data: details about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud databases, or regulators or law enforcement agencies.
8. Previous and current claims: details about current and previous claims which may include health data and criminal records.

9. Sensitive personal data such as ethnicity, religion, criminal records and health data including medical conditions, medical results, testing and records.

5. PERSONAL DATA SHARING

gig-Bahrain may share your personal data including sensitive personal data for the below mentioned reasons:

1. Internally with gig-Bahrain's subsidiaries when there is a legitimate business interest.
2. With third parties when required by the law, or where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so. These third parties include external auditors, system support vendors, and governmental bodies and may include the following:
 - a. External Actuarial for obtaining actuarial opinion
 - b. Insurance brokers to administer our relationship with you
 - c. Third Party Service Providers
 - d. Banks to process payment transactions including online payments and if Bank interest is involved, the original Policy may be delivered to the Bank.
 - e. Reinsurers and reinsurers' brokers to share the risks and premiums and further claims analysis
 - f. External surveyors to conduct the survey in order to conclude estimation value
 - g. Attorneys for managing court cases between you and gig-Bahrain
 - h. Other insurance companies for recovery and settlement of claim, if the insured is not at fault
 - i. Garages to carry out vehicle repairs and deliver the vehicle to you.
 - j. Third Party Administrators ("TPAs") to provide us the list of Medical providers/ hospitals/clinics along with membership cards, administer medical insurance claims, and keep track of policies due for renewal

6. SECURITY OF YOUR PERSONAL DATA

Your personal data will be processed as per gig-Bahrain's Personal Data Protection Framework. We use reasonable and appropriate measures to protect your personal data from unintentional or unauthorized destruction, accidental loss, unauthorized alteration, disclosure or access, or any other form of processing, taking into account the risks involved in the processing and the nature of the personal data.

7. RETENTION PERIOD OF YOUR PERSONAL DATA

gig-Bahrain retains your personal data based on legal retention period requirements, the validity of the contract, fulfilling its intended purposes, and historical archiving. We securely destroy and erase or anonymize your personal data to ensure that it cannot be restored after exceeding the specified retention period. In the majority of cases this will be for minimum of ten years from the end of your relationship with gig-Bahrain.

8. YOUR RIGHTS AS A DATA OWNER

You have the right to request gig-Bahrain to:

1. Access your personal data processed by gig-Bahrain
2. Change your personal data when it is inaccurate or incomplete
3. Remove, block or restrict your personal data when:
 - a. Purpose of personal data is no longer valid
 - b. Processing of personal data is unlawful
 - c. Processing of personal data lacks the legitimate interest of gig-Bahrain
 - d. Deletion is necessary for compliance with the law
 - e. Personal data is inaccurate
 - f. You wish to withdraw your consent
4. Submit an objection when personal data is used for:
 - a. Direct marketing
 - b. Processing that may result in defamation or discrimination causing possible financial or emotional loss
 - c. Decision making and the decision is taken based only on automated processing
5. Withdraw your consent at any time to process or transfer your personal data for a specific reason

gig-Bahrain has the right to reject your request. gig-Bahrain will inform you about the rejection along with the reason for rejection within 15 business days of receiving the request. In case your request is incomplete, gig-Bahrain will inform you within 10 days of receiving the request to complete your request. Further, you have the right to complain to Bahrain Personal Data Protection Authority/Ministry of Justice.

9. YOUR ROLE TO KEEP YOUR PERSONAL DATA ACCURATE

It is essential for gig-Bahrain to keep your personal data up to date and accurate. Therefore, kindly provide your updated information in case there is any change to your personal data during your business relationship with us.

10. UPDATE ON PRIVACY NOTICE

gig-Bahrain has the right to review and update the privacy notice. In case of any changes, we will inform you of any substantial change in how we process your personal data.

11. CONTACT US

gig-Bahrain welcomes your comments regarding this Privacy Notice. If there is any concern related to processing your personal data, please do not hesitate to reach out to our Data Protection Supervisor (DPS) throughout the below contact details: DPS Email Address: DPS@gig.com.bh

gig-Bahrain
BKIC Tower 2775, road 2835, block 428, Seef District, Kingdom of Bahrain

We will take commercially and reasonable efforts to promptly determine and remedy the problem.

Please note: You have the right to withdraw your consent at any time by contacting our DPS or Customer Care as long as withdrawal will not stop us from performing our legal and contractual obligations. Additionally, if you failed to provide us with any of the above personal details, we may not be able to process your personal data and comply with the legal and contractual requirements which we have entered with you e.g. issue of insurance policy, process payments and claims etc.