Newton Insurance - Privacy Policy

Effective Date: 30/09/2025

1. Introduction

Jordan International Insurance / Newton Insurance, a public shareholding company duly incorporated in the Hashemite Kingdom of Jordan, recognizes the importance of protecting the personal data and privacy of its customers.

This Privacy Policy explains the company's practices regarding the collection, use, disclosure, and protection of customers' personal data, in accordance with the **Personal Data Protection Law No. 24 of 2023** and related regulatory instructions issued by competent authorities.

This Policy briefly and clearly outlines how the Company processes customers' data, and we kindly invite you to read it carefully.

This Privacy Policy explains in plain language how we collect, use, share, and protect your personal data in line with the Jordanian Personal Data Protection Law No. (24) of 2023 and the related Central Bank of Jordan regulations.

2. Categories of Data Collected

Type of Data	Examples	Primary Purpose of Processing	Legal Basis
Identification and Contact Data	Name, address, national ID, date of birth, mobile number, email address	Creating client records, issuing and managing insurance policies, customer service communication, identity verification	Performance of the insurance contract; legal obligations (e.g., AML/CFT compliance); judicial decisions
Financial Data	Bank account details, payment history, claims history	Processing payments and collections, claims settlement, credit risk management	Contract performance; legitimate interest (debt recovery, fraud prevention); judicial decision
Sensitive Health Data	Medical history, test results, lifestyle details (e.g., smoking)	Risk assessment, medical underwriting, claims handling, offering suitable insurance products	Explicit consent; public interest in health insurance; judicial decision
Technical Data	Cookies, IP address, browser type, website activity	Enhancing user experience, performance analytics, cybersecurity protection	Legitimate interest (operation, optimization, and protection of website)

Type of Data	Examples	Primary Purpose of Processing	Legal Basis
Data from Third Parties	Data from insurance providers, hospitals, or public databases	· ·	Legitimate interest; legal obligation; judicial decision

3. Methods of Data Collection

The Company may collect personal data using one or more of the following methods:

- Directly from the customer through insurance applications (paper or electronic), telephone, email, or in-person communication with Company representatives.
- Automatically through analytics technologies such as cookies when visiting the Company's website.
- From third parties including employers, insurers, medical providers, regulators, or publicly available sources for verification purposes.

4. Marketing Communications

The Company may use customers' contact details to send promotional offers related only to its own products and services. Customers have the right to object at any time by using the unsubscribe link or contacting the Company through the communication channels below. The exercise of this right shall not affect the provision of core insurance services. The Company does not share customer data with third parties for their independent marketing purposes without the customer's explicit consent.

5. Data Sharing

The Company may share customers' data, when necessary and for the purposes described above, with regulatory authorities, insurers and reinsurers, brokers, technical and cloud service providers, payment processors, healthcare providers, legal advisors, accountants, and judicial authorities.

Such disclosures are governed by written agreements imposing strict confidentiality and data-protection obligations.

The following table summarizes typical data-sharing scenarios:

Type of Data	Recipient	Purpose of Sharing	Legal Basis	Frequency
Identification & Contact Data	Brokers, reinsurers, system providers, regulators	Pricing, policy issuance, relationship management	Contract performance; legal obligation	Regular

Type of Data	Recipient	Purpose of Sharing	Legal Basis	Frequency
Financial Data	Banks, regulators, collectors	Payment processing, anti-fraud, due diligence	Legal obligation; legitimate interest	Regular
Sensitive Health Data	Medical providers, loss adjusters, reinsurers	claims settlement	Explicit consent; contract performance; legal obligation	Case-based
Technical Data	IT and analytics providers	Cybersecurity, performance enhancement, analytics	Legitimate interest	Regular
Official Documents	Competent national authorities	Verification (KYC), AML/CFT compliance	Legal obligation	Regular

6. Data Retention

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected and to meet legal or regulatory requirements.

Records arising from due-diligence procedures and transactions are kept for not less than **five (5) years** after the transaction's completion or the end of the relationship — whichever is longer — in accordance with **Article 17 of the Anti-Money Laundering and Counter-Terrorist Financing Law No. 20 of 2021**.

After expiration of the retention period, data is securely deleted or anonymized.

7. Data Processing Methods

Personal data is processed using computers and other IT-enabled tools in accordance with the principles of confidentiality and integrity.

Access to data is limited to authorized personnel involved in operating the Company's systems (management, sales, marketing, legal, system administration) and, where necessary, to external service providers (IT hosting, courier services, communications agencies, etc.) acting as data processors under the Company's instruction.

8. Customers Rights

Customers have the following rights regarding their personal data:

- (a) **Access** to obtain a copy of their personal data held by the Company.
- (b) **Rectification** to correct inaccurate or incomplete data.
- (c) Withdrawal of Consent to withdraw previously granted consent at any time.
- (d) **Objection** to object to processing for direct-marketing purposes.

- (e) **Erasure ("Right to be Forgotten")** to request deletion of their data, subject to legal obligations requiring retention (e.g., five-year retention under the AML/CFT Law).
- (f) **Breach Notification** to report any personal-data breach affecting their information.

9. Children & Minors

If the data subject is under eighteen (18) years of age or lacks full legal capacity, consent for collection and processing must be provided by a parent or legal guardian on behalf of the data subject.

10. Cookies & Tracking Tools

The Company uses cookies and similar tracking technologies for analytics, performance measurement, and re-targeting, in line with this Policy. Customers can manage cookie preferences through their browser settings and the Company's Cookie Policy.

11. Policy Changes

Any material amendments to this Policy will be published on the Company's website and, where required, communicated to customers through appropriate channels before becoming effective. Continued use of the Company's services after the effective date constitutes acceptance of the updated Policy.

12. Contact Information

For any inquiries about this Policy, please contact us through any of the following:

Email: info@newtoninsurance.com

Phone: +962 6 5901150