

The Product

The Samsung Care+ product provides you with comprehensive insurance coverage for your Samsung devices. Data processing by bolttech entities (as further explained below) for Samsung Care+ includes managing your coverage, processing insurance claims, repairing or replacing your insured mobile devices, and communicating with partners and service providers to provide these services.

Insurance benefits are provided by AmTrust Specialty Limited.

Amtrust's privacy policy can be found at

[ASL Privacy Notice](#)

Samsung

Samsung's privacy policy can be found on Samsung's website

Insurance contract handling is provided by bolttech Insurance Services (UK) limited

Claims administration and fulfillment is provided by Bolttech Device Protection (Ireland) Limited as administrator.

Depending on your needs, Bolttech Ireland Limited works with authorized repair service providers and other service partners to provide you with a complete insurance service.

1. General information on data protection

This Policy only covers the processing of your data carried out by bolttech entities that act as controllers independent of the insurer. Bolttech Insurance Services (UK) Limited is responsible for administering the contract jointly with the insurer, and Bolttech Device Protection (Ireland) Limited is responsible for managing claims (hereinafter collectively referred to as "bolttech Data Controllers").

Here we inform you about the processing of personal data in the context of the provision of the above-mentioned insurance services for mobile devices under the controllership of the bolttech Controllers mentioned above. If in the following a reference to "we" is made, this means that the corresponding regulation applies to both bolttech Controllers. If data processing differs per bolttech Controllers, these are mentioned individually

Personal data in this context is any information relating to an identified or identifiable natural person (hereinafter referred to as "data subject").

The responsible bolttech data controllers and addressees for the exercise of the rights of you as the data subject are:

• For the insurance contract handling

bolttech Insurance Services (UK) limited (in the following referred to as BT UK)

27 Old Gloucester Street
London WC1N 3AX

• For the processing of insurance claims

Bolttech Device Protection (Ireland) Limited (in the following referred to as BT IE)

77 Sir John Rogersons Quay
DUBLIN 2 D02 VK60,

2. Applicable law

References to GDPR in this document refer to the UK GDPR, as retained in UK law under the Data Protection Act 2018 and amended by the Data (Use and Access) Act 2025. Where applicable, EU GDPR may also apply for cross-border processing.

3. Data and categories of data as well as processing purposes

a. Data and data categories

(1) Personal data

In order to provide the insurance services, we collect and process the following personal data:

- **Contact details:** title, surname, first name, full address, email address, telephone number, date of birth
- **Device data:** details about your mobile devices (make, model, price, IMEI numbers)
- **Insurance Data:** Information about your claims, claims, reports, and information to support your claim

(2) Technically generated data

In the context of the use of our digital services on our websites, the following data (Usage Data) may also be collected through our digital services and analytics platforms (e.g., Google Analytics, VWO), subject to user consent and in compliance with the EU General Data Protection Regulation (GDPR). Use of cookies and similar technologies complies with the UK Privacy and Electronic Communications Regulations (PECR). Consent is obtained where required.

- Device and Application Information
- Device type, manufacturer, model, operating system
- Screen resolution, language settings, app version, installation date, and usage frequency
- Network and Connection Data
- Mobile network provider, connection type (e.g., Wi-Fi, LTE), network latency
- Session and Identifier Data
- Session ID, authentication tokens, user agent string, cookie identifiers
- Interaction and Behavioral Data
- Clickstream data, mouse movements, scroll behavior, time spent on pages, navigation paths, form interactions, and participation in A/B tests or heatmap tracking
- Error and Diagnostic Data
- Crash reports, error messages, performance metrics, and diagnostic logs
- Location Data
- Approximate geolocation derived from IP address or GPS (where applicable and consented)

(3) Data contained on repair equipment

Device Data on Repair: If you submit your device for repair without first resetting it to factory settings as expected from you in the Insurance Terms and Information sent to you as part of the claim submission, it may still contain personal information, account login credentials, photos, contacts, messages, or other sensitive information that may inadvertently become known to third parties.

b. Purposes and their legal basis for which the personal data is processed

(1) Provision of the contractually agreed service

In the following cases, the data processing serves to carry out the contractual required service in accordance with Art. 6 (1) (b) GDPR:

i. Insurance Contract

In order to conclude and administer the Insurance contract BT UK collects and processes your data to provide the insurance contract you have requested, including customer communication, policy administration and customer care.

ii. Claims processing

BT IE is processing all data necessary for the handling of insurance claims, the coordination of repair and replacement services, the communication with service partners.

iii. Data protection during repairs

BT IE's repair partners are authorized to delete personal data that has remained on devices submitted for repair to protect your privacy but they are not obliged to.

iv. Customer

We process your data to process customer inquiries, complaints and communications, and to collect and manage customer feedback on the services provided.

(2) Legitimate interest

In the following cases, we collect and process the data within the framework of a legitimate interest in accordance with Art. 6 para. 1 lit. f) GDPR. In certain cases, processing may rely on recognized legitimate interests under Article 6 of the UK GDPR, as amended by the Data (Use and Access) Act 2025.

i. Fraud and abuse prevention

Preventing fraud, money laundering, terrorism and other crimes by monitoring and analyzing transaction patterns and behavior.

ii. Technical improvements

Process Usage Data to improve the functionality of the Website and to correct software or process errors.

iii. Improve service quality

As part of the telephone contact, individual conversations about the training can be listened to or recorded. You will be informed about this before the interview and will be given the opportunity to object to it.

iv. Business

Analysis and optimization of our services as well as internal reporting to the bolttech Group.

(3) Legal obligation

We process your data to comply with legal, accounting and tax obligations pursuant to Art. 6 (1) (c) GDPR, in particular:

- Retention of business records
- Compliance with regulatory requirements
- Reports to authorities

(4) Consent

In the following cases, we collect and process data within the framework of consent pursuant to Art. 6 (1) (a) GDPR:

i. Marketing Communications

Sending marketing materials, product information and promotions [only with explicit consent].

ii. Data analysis and profiling

In individual cases according to specific information prior given to the consent.

4. Recipients or categories of recipients of personal data

a. Data transfer within the bolttech Group

Personal data may be shared with other companies affiliated with the bolttech Controllers that provide support services and for reporting purposes also outside the EEA under applicable Standard Contract Clauses.

b. Transfer to external third parties

The data you provide will be shared with the following categories of recipient:

i. Insurance company as independent controller

AmTrust Specialty Limited as an insurer to provide the insurance services

ii. Service partners and processors

- **Authorized Repair Providers:** For repairs and replacements of your insured mobile devices. They have the right to erase all personal data on the devices and reset the devices to factory settings before they start repairing. However, deletion is not guaranteed.
- IT service providers and other processors providing technical services
- As part of telephone contact with the bolttech companies, AI-supported language agents can be used for translation. A biometric analysis of voice data is not carried out.

iii. Authorities and public bodies

Government agencies or public bodies when required by law or necessary to prevent/combat crime

iv. Samsung

For contractually necessary customer administration.

c. Processor

Processors are contractually obliged in accordance with Art. 28 GDPR to comply with strict security requirements in accordance with the provisions of data protection laws.

5. Storage period and criteria for storage duration

a. Storage for insurance benefits

Contract data: For the duration of the insurance contract after the end of the contract in accordance with statutory retention periods.

Damage data: After submission of the claim in accordance with insurance law requirements and statutory retention periods.

b. Storage for support and troubleshooting

After a transaction is completed, the data can be stored in the operational system for support and troubleshooting purposes for a period necessary to solve such topics.

c. Storage for legal requirements

Business documents are stored in accordance with the respective statutory retention periods.

d. Storage for legitimate interests

Anti-fraud and business development data will be stored for a reasonable period of time according to business needs and retention periods set by the law unless deleted or anonymized earlier.

e. Deletion criteria

Data is deleted when:

- The purpose of the processing no longer applies
- Legal Retention Periods Expire
- you withdraw your consent and there is no other legal basis
- The data is no longer required for the original purposes

6. Places of data processing

As a matter of principle, we only process your personal data within the European Union and in other countries with an adequate level of data protection or outside of those within bolttech group based on Standard Contract Clauses with sufficient guarantees.

Data transfers to third countries:

If personal data is processed outside the EU/EEA or the UK in individual cases, we ensure by means of appropriate safeguards under the UK GDPR and EU GDPR:

adequacy decisions of the EU Commission, or

- Standard contractual clauses in accordance with Art. 46 GDPR, or Other appropriate safeguards under GDPR]

7. Automated decision-making

Automated Damage Assessment:

As part of claims processing, automated procedures can be used for the initial assessment of claims. These can lead to automated preliminary decisions, but these will always be subject to manual review.

Fraud detection systems:

Automated fraud detection systems can trigger further manual review of suspicious transaction patterns.

Your rights in automated decision-making:

In accordance with Articles 22A–D of the UK GDPR, you have the right to human intervention, to present your point of view, and to challenge the decision.

8. Secure communication

For the transmission of confidential information, we recommend contacting us via our secure website forms or by post. If you contact us by e-mail or other unencrypted channels, complete data security cannot be guaranteed.

9. Special notes on the repair process

a. Data deletion before repair:

Before submitting your device for repair, you will be explicitly asked to delete all personal data, log out all accounts, and reset the device to factory settings. This measure is required to protect your privacy and prevent third parties from gaining access to your personal information. If you miss to do so, you carry any risk of such data being lost or involuntarily disclosed.

b. Processing of remaining data:

If you do not comply with this request and there is still personal data on the device, our repair partners are entitled to delete this data immediately and completely and to reset the device to factory settings before the repair begins.

c. Disclaimer:

We accept no liability for loss of data or unauthorized access by third parties if you have not properly reset your device prior to submitting it for repair. Although our repair partners have the right to delete data, we cannot guarantee that all data is protected from possible inspection. The responsibility for proper data deletion prior to device submission lies with you as the customer.

10. Your rights

a. Right to erasure

You have the right to have your personal data deleted in accordance with Art. 17 GDPR, if:

- The data is no longer required for original purposes
- You withdraw your consent
- The data has been processed unlawfully
- Legal deletion obligations exist

Exceptions: The right of deletion does not exist if the processing is necessary to fulfil statutory retention obligations or to assert legal claims.

b. Right to information

You can request information about the processing of your personal data at any time in accordance with Art. 15 GDPR. The information includes in particular:

- Processing Purposes
- Categories of data processed
- Recipients or categories of recipients
- Planned storage period
- Existence of data subject rights

c. Right to rectification

You have the right to have incorrect personal data corrected or incomplete data completed (Art. 16 GDPR).

d. Right to restriction

Under certain legal conditions, you have the right to restrict processing (Art. 18 GDPR).

e. Right to data portability

Under certain legal conditions, you have a right to receive or transmit personal data concerning you in a structured, commonly used and machine-readable format (Art. 20 GDPR).

f. Right to object

You have the right to object at any time to the processing of your personal data based on legitimate interests (Art. 21 GDPR). This applies in particular to:

- Direct marketing (at any time without giving reasons)
- Other processing based on legitimate interests (in special circumstances)

g. Withdrawal of consent

If the processing is based on your consent, you can revoke it at any time (Art. 7 para. 3 GDPR). The revocation does not affect the lawfulness of the processing carried out up to the revocation.

h. Right of appeal

You have the right to complain about the processing of your data to a supervisory authority. Competent supervisory authorities:

For Bolttech Device Protection Limited:

Data Protection Commission

21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

For bolttech Insurance Services (UK) limited

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Telephone: 0303 123 1113

Fax: 01625 524510

Phone: +43 1 52 152-0

E-Mail: dsb@dsb.gv.at

i. Exercising your rights

To exercise your rights, please contact:

Email: privacy@bolttech.eu

Please understand that we will take appropriate measures to ensure that you are the correct authorized person.

11. High data security standards

We protect the data stored on our servers according to the current state of the art by means of suitable technical and organizational measures as required by the law.

Data breaches:

In the event that a data breach is discovered, we have processes in place to take prompt mitigating measures and, if necessary, notify the relevant supervisory authorities and data subjects in accordance with the legal requirements.

12. Changes to the Privacy Policy

Since changes in the law or changes to our internal company processes may make it necessary to adapt this data protection provision, we reserve the right to make changes. We will inform you of any significant changes in good time.

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