# Personal data protection & Pay as you Drive insurance

Personal data protection & security aspects related to ITS applications - ITS Action Plan



Frederic Bruneteau, Managing Director, PTOLEMUS Brussels - 12<sup>th</sup> June 2012

## Who we are

# PTOLEMUS Consulting Group

- The 1<sup>st</sup> international strategy consulting firm specialized in telematics, location-based services & mobility
- Strategy combined with real industry expertise and operational experience
- A focus on achieving results for our clients
- Close links with the mobility ecosystem
  - Advisory Board Member of EENA<sup>(1)</sup>
  - Member of ERTICO's<sup>(2)</sup> eSafety Forum and eCall HeERO Observers Group
  - Close connections to national ITS organisations, ACEA<sup>(3)</sup>, ASECAP<sup>(4)</sup>, GSMA<sup>(5)</sup>, etc.
  - Speakers at most leading industry events & conferences
  - Regular contributor to Telematics Update
  - Steering Committee Member of Mobile Monday (Brussels)

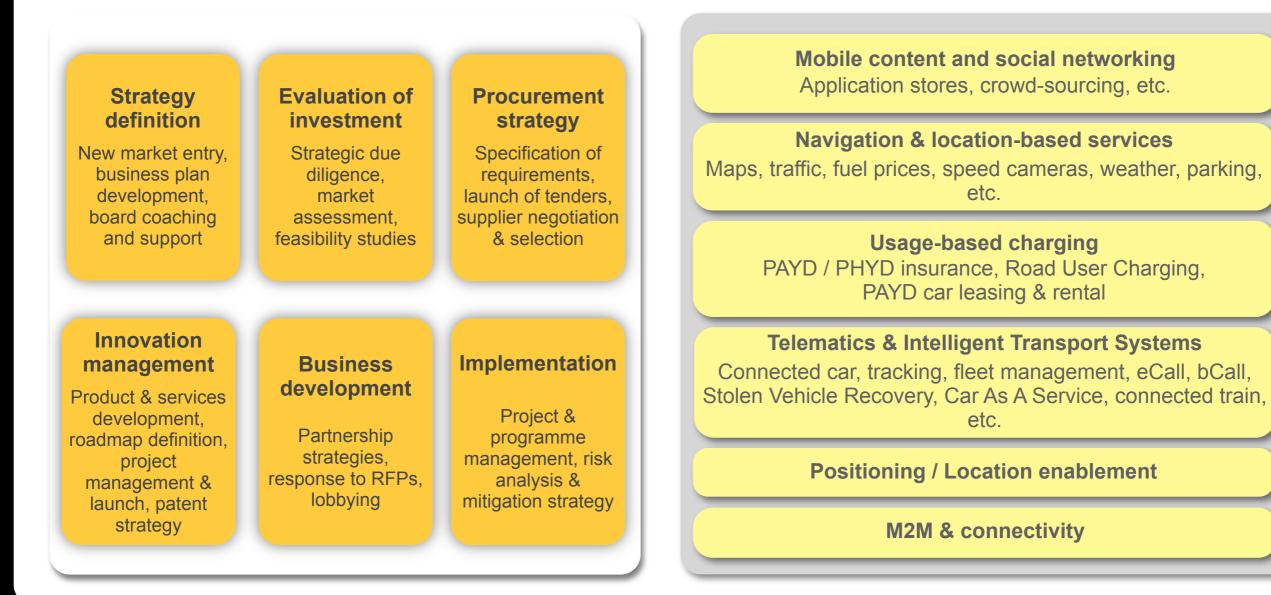


from Ptolemy, the Egyptian savant who built the 1<sup>st</sup> map of the world in the 2<sup>rd</sup> century

### **PTOLEMUS** is the first management consulting firm focused on telematics and geolocation

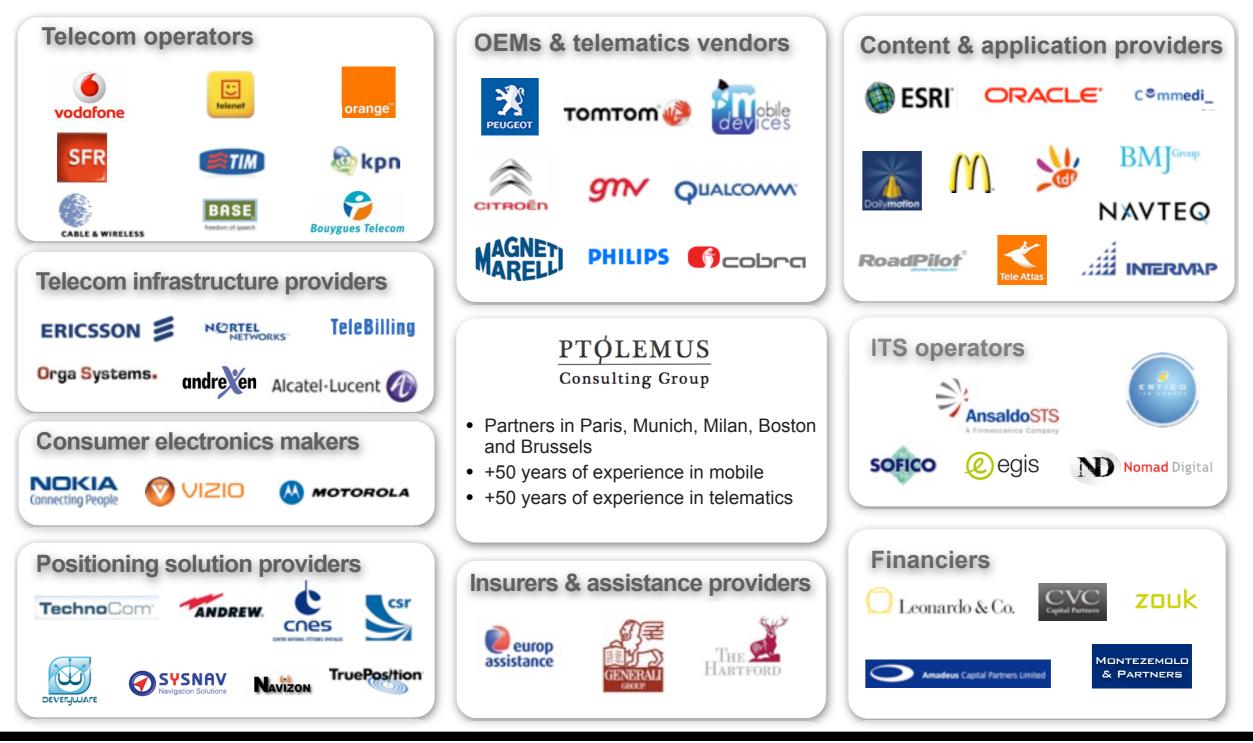
**Our fields of expertise** 

### **Our consulting services**



#### PTOLEMUS in PAYD

# We have acquired substantial experience in helping all players in the *geo-connected mobility* ecosystem



#### Introducing PTOLEMUS

# **PTOLEMUS** just published the Insurance Telematics study, the most comprehensive report on the subject



More than a research study, a real strategic market analysis

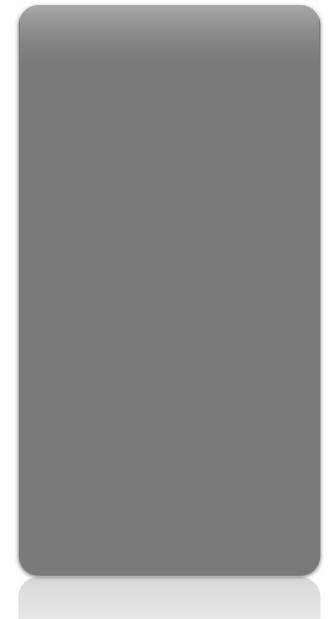
- 410 pages of analysis on the PAYD / PHYD market based on
  - 85 interviews in 18 countries
  - 230 figures (charts, tables...)
  - 2 years of research
  - Our experience & vision of the ecosystem incl. OEMs and TSPs
- **Case studies & learnings** from ALD Automotive, Amaguiz, Coverbox, Discovery Insure, GM OnStar, Hollard Insurance, Insurethebox, Liberty Mutual, MAIF-MACIF, Norwich Union, Octo Telematics, Progressive, Solly Azar, State Farm, Unipol, Uniqa, Zurich
- A strategic analysis of the value chain evolution including
  - The impact of eCall
  - The impact of the smartphone
  - The impact of the Test-Achats / gender ruling

- 10-year market forecasts
  - Country's readyness to telematics
  - Forecasts for the US, Italy, the UK, France, Germany and Russia - Based on bottom-up estimates of the number of policies for each insurer in EU countries, the USA and in South Africa
- **Insurer's telematics market model** results in Italy, the UK, France and Germany
- A handbook of suppliers' solutions including our own evaluation & ranking
- A complete set of **recommendations** to underwriters, TSPs, OEMs and governments

In this presentation, we will use several expressions interchangeably - Although they have slightly different meanings

- Pay as you Drive (PAYD) insurance
- Pay how you Drive (PHYD) insurance
- Insurance telematics
- Usage-based insurance (UBI)



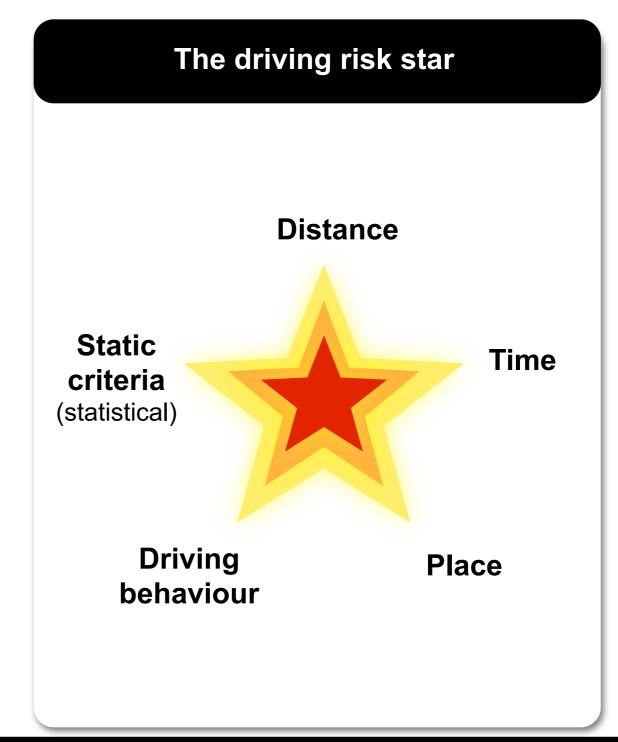


# **PTOLEMUS** For a detailed definition of these terms, please refer to our Insurance Telematics Study

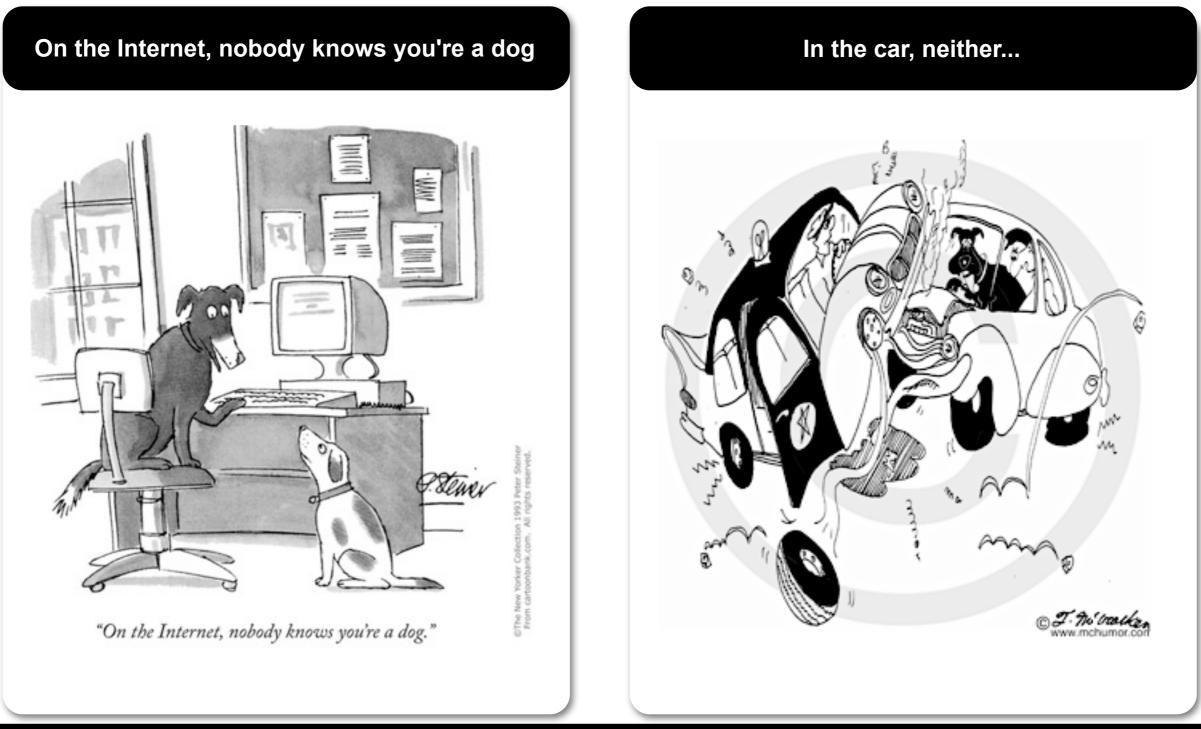
# What is insurance telematics?

#### Its basic principles

- Most current insurance policies use static / statistical criteria to evaluate drivers' risks - Age, gender, vehicle make & age, place of residence, occupation, etc
- Insurance telematics is a policy based on these criteria and 4 new dynamic parameters
- It requires the customer's acceptance to obtain this data through a telematic device installed in the vehicle

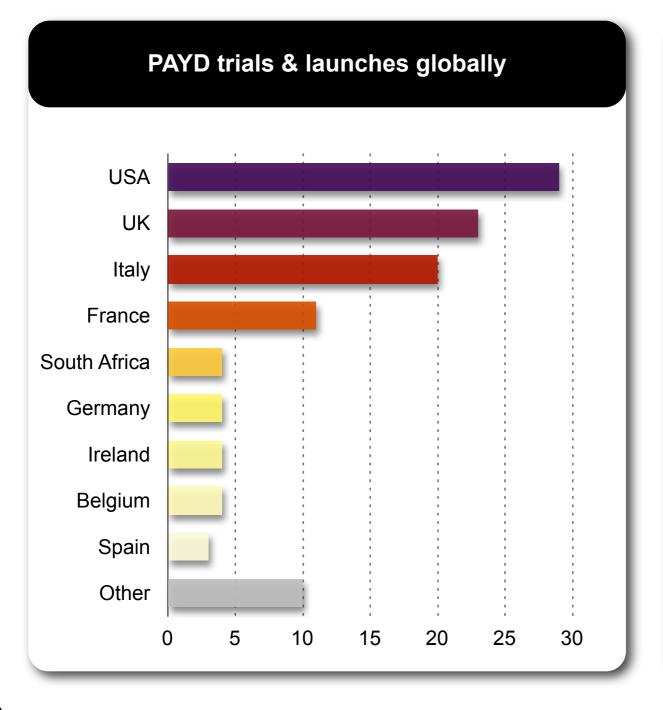


# In the current motor insurance market, good drivers are paying for... dogs



# PTOLEMUS Source: The New Yorker, mchumor.com

# Despite insurers' concerns about user's acceptance of PAYD, it is gradually becoming mainstream



#### PAYD has passed the trial phase

- 94 trials and **54 commercial launches** worldwide
- Success stories in multiple countries, notably Italy (Unipol) and the US (Progressive)
- Overall, we estimate PAYDequipped vehicles at 2.5 million worldwide
- In Europe, the **Test-Achats / gender ruling** will give further impetus to the PAYD market

# The rules over privacy are gradually becoming more transparent

#### In Europe

#### The **1995 Data Protection Directive** applies to PAYD and mandates that personal data shall be

- processed fairly and lawfully;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and not excessive in relation to the purposes for which they are collected/ processed;
- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data were collected

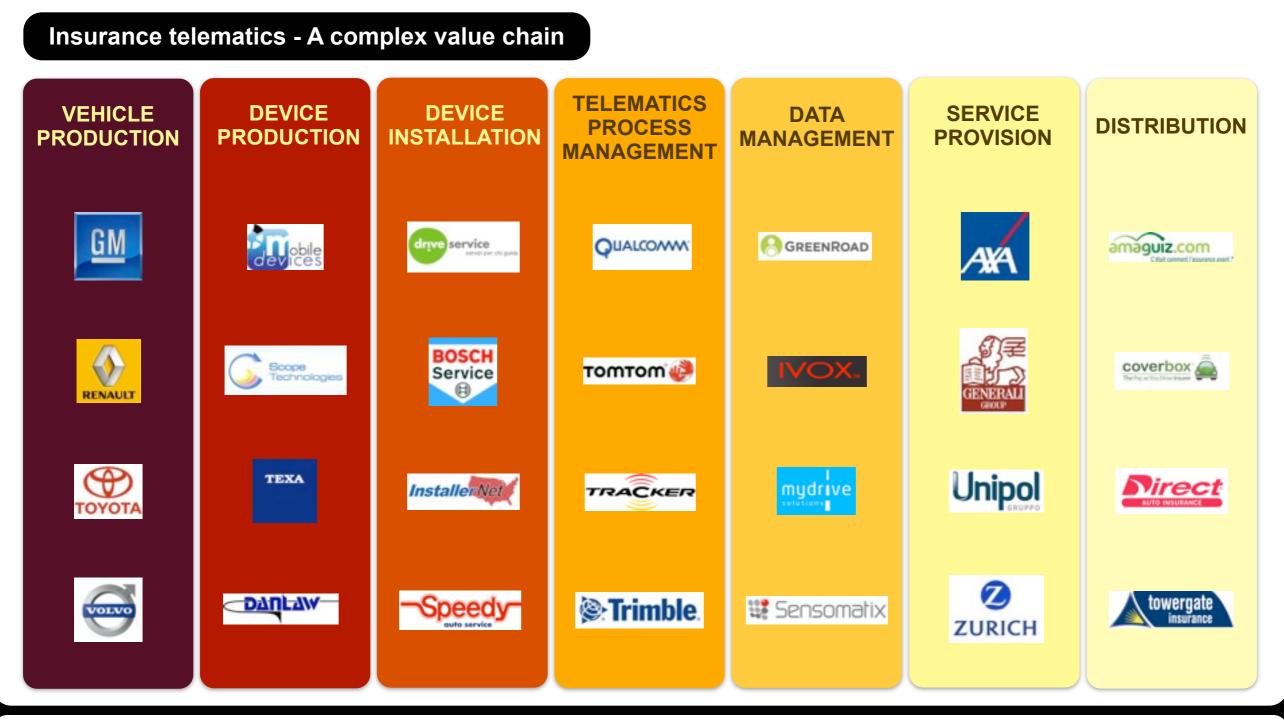
#### One example: France

- In 2005, CNIL prevented MAAF from launching a commercial PHYD trial as its system was recording live speed, thereby verifying law enforcement, which is forbidden
- In 2010, it issued a recommendation on PAYD, eCall and Stolen Vehicle Recovery
  - It clearly autorises PAYD and PHYD but sets clear limits
  - Personal location data should not be kept longer than required to calculate the premium
  - The use of driving data to establish the premium must be done in a transparent and objective manner
  - Speed can be used if averaged over a certain period
  - The user should remain regularly informed of the fact that his vehicle can be located

# With PHYD, the policyholder can have access to its driving behaviour data in real time



### Personal data can be controlled & processed by several players



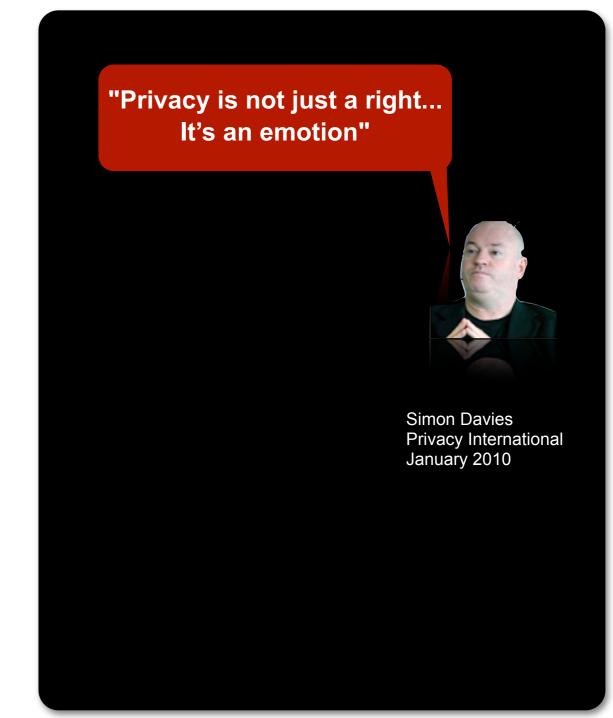
## It is in the insurers' interest to be seen as data protection friendly - Simply to attract customers to these new policies

- In 2008, **Norwich Union** failed -Notably due to privacy acceptance issues
- **Progressive Insurance,** the US **leader** of the PHYD market also made several attempts
- In 2010, it launched *Snapshot*, which
  - Reports mileage and driving behaviour but
  - Does not report the user's location (not GPS-enabled)
  - Allows the premium to be set after only 1 month of measurement
  - Stops the measurement after 6 months
- This is a **big success**, with around half a million customers



## In our view, insurers and their suppliers need to take privacy and security even more seriously

- The **trust** that customers put on insurers' ability to guarantee personal data protection will be key to success
- We believe that certain insurers' data protection and security issues are not handled as they should
- Numerous schemes, notably in the US, let customers believe that they do not have **control** over their data
- Most insurers & suppliers have not proven their ability to resist hacker attacks



# Key issues for regulators to consider

- Should they **promote PAYD** schemes as a way to reach currently unattainable CO<sub>2</sub> emissions objectives?
- Should there be specific data protection stipulations on insurance telematics?
  - How to give a **clearer guideline to insurers** about what is possible and what is not eg. to obtain long-term statistical data on driving behaviour?
  - Should the driving behaviour **data formats be standardised** so that policyholders can bring their data to another insurer?
  - How to avoid **fragmentation** and ensure **interoperability** of privacy protection frameworks in 27 countries?
  - How to avoid the **flight of** all **data managers** to lower, less regulated non-EU countries?
- How to avoid **excessive or misplaced regulation**, which could prevent this revolution in the auto insurance market?
- How to **open up the car's network**, to enable third parties to access relevant data for insurers and other third parties?

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### **Technology enables better and fairer auto insurance pricing. How to find the right balance?**



- We expect **PAYD** to represent **60 million policies** in Europe by **2020**
- In this domain, market forces have pushed insurers to take personal data protection issues seriously
- However, in Europe, the sector suffers from both unclear regulation- and privacy paranoia
- Better regulation should clearly **approve** PAYD/PHYD while setting **clear limits**
- This is a topic for the **aftermarket** but also for the **OEM** channel - particularly due to the implementation of eCall

### PTOLEMUS Consulting Group Strategies for Mobile Companies

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