Lemonade

Data Privacy in Practice

Scott Fischer December 12, 2022





One of these things is not like the other





Open Questions in the Insurance Context

What is the best way to handle <u>tradeoffs</u>

• For fraud detection, for example, we want to ensure that users can't *manipulate*data. How much transparency can we actually provide?

What level of control can users have?

o In the traditional consumer context, users are allowed to delete their data for a potentially less personalized experience. In the car insurance context, for example, if we allowed users to delete data, we could end up with a skewed perception of risk. How do we balance this approach?

What are the best ways to provide users with <u>context</u>?

• Are Terms of Service or Privacy Policies the best way to achieve this? What should or could disclosure look like?

How should this UNIQUE industry think about privacy?

Intentional collection & use of a user's data

- What data are we collecting from users and why?
- Who has access to that data, and what can they use it for?
- What do users know about their data, and what control do they have?

How do insurers collect data?

Data directly from users

Ideally sensitive & personal data should come from the user

Data from 3rd party sources

• Data that relates to user behavior in other domains (e.g. house purchase)

Data indirectly provided

• User behavior (e.g. scrolling through the product)

Data generated within the company

• Data about a user that is generated, for example via machine learning (e.g. detection of whether a user has a swimming pool)

User data ranges in its sensitivity

Less Sensitive More Sensitive

Not user identifiable *E.g. Scrolling patterns*

User is identifiable and data is personal *E.g. Video footage*

Data is considered SPII (significant harm if compromised) E.g. SSN, Biometrics Less Sensitive

Not user identifiable *E.g. Scrolling patterns*

User is identifiable and data is personal *E.g. Video footage*

Data is considered SPII (significant harm if compromised) E.g. SSN, Biometrics

More Sensitive

And depending on how sensitive the data is, we should consider:

How it is collected

What user controls exist

Who can access the data internally & externally

Less Sensitive

More Sensitive

Not user identifiable E.g. Scrolling patterns User is identifiable and data is personal *E.g. Video footage*

Data is considered SPII (significant harm if compromised) E.g. SSN, Biometrics

The more sensitive the data, the more guarded access should be...

Can provide more broad access and use across use cases & features

Limited access for purposes that are predefined for users

Extremely limited access internally, and should be used only for a handful of purposes where no other data can be used

Less Sensitive

More Sensitive

Not user identifiable E.g. Scrolling patterns User is identifiable and data is personal *E.g. Video footage*

Data is considered SPII (significant harm if compromised) E.g. SSN, Biometrics

...and the more control and awareness users should have

Can be indirectly collected and stored without explicit consent

Provide users appropriate levels of awareness and control depending on the use case Explicitly seek user permission to collect or generate data

Allow users controls to be able to access and delete data

How do insurers collect data?

Data from 3rd party sources

- Data that relates to user behavior in other domains (e.g. house purchase)
- Need to hold 3rd party accountable for clarity during collection

Data directly from users

- Ideally sensitive & personal data should come from the user
- Purpose should be clear to users through the user experience

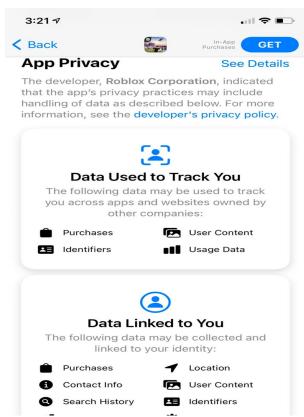
Data indirectly provided

- User behavior (e.g. scrolling through the product)
- Indirect behavioral data should not contain any sensitive information such as PII

Data generated within the company

- Data about a user that is generated, for example via machine learning (e.g. detection of whether a user has a swimming pool)
- When users provide information for generation, should be informed of how data may be used, especially for more sensitive cases

What do users know & control do they have?

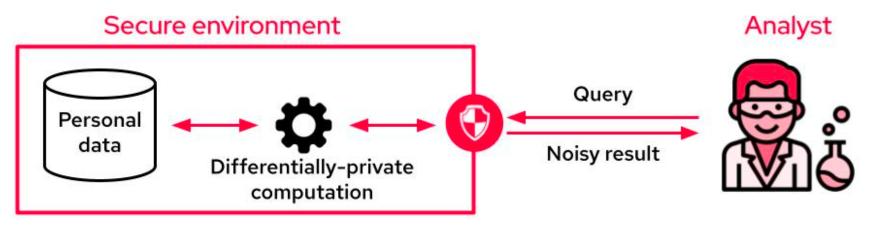


- Provide users context while the data is being collected
- Provide a common help center or space for users to understand what data is being collected, and for what purposes
- Account deletion == Data deletion
- Identify what data makes sense for a user to have control over, in terms of deletion, access, and usage

Technical innovations in the space

Techniques like Differential Privacy and Federated Learning are making it possible to add noise to or silos a user's data, while still providing access to train models

*not being used in Insurance yet – are these options?



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Thanks!