

Collingwood Insurance Company Limited

Privacy Notice



Data Protection

We are governed by the Data Protection Regulation applicable in both the United Kingdom and Gibraltar. Under this legislation **we** are required to tell **you** the following information. It explains how **we** may use **your** details and tells **you** about the systems **we** have in place that allow **us** to detect and prevent fraudulent applications for insurance policies and claims. The savings that we make help **us** to keep premiums and products competitive.

In order to provide **our** services, **we** will collect and use data about individuals, this means **we** are a 'data controller'.

The legal basis for processing **your** data is the performance of an insurance contract arranged between **you** and **us**. **We** are registered for the purposes of, and exercise control over, the processing of personal data, for which **we** carry specific responsibilities.

This privacy notice may be updated from time to time, the latest version can be accessed from www.collingwoodinsurancecompany.com.

Why we need your data

Insurance Administration Purposes

The personal data **we** collect will depend on **our** relationship with **you**. For example, **we** will collect and hold more detailed information about **you** if **you** become a customer than if **you** simply receive a quote. Certain types of personal data are considered to be "special categories of data" due to their more sensitive nature. Sometimes **we** will ask for or obtain special categories of information because it is relevant to **your** insurance policy or claim.

Where **we** refer to personal data, as set out in these notices, it is also deemed to include special category data, for example; medical conditions or convictions.

The information that **you** give **us** will be used by **us** and **your insurance intermediary** and anybody appointed by **us** or them for the purposes of providing **you** with a quotation with a view to entering into an insurance contract, administering **your** insurance policy or a claim. It may be disclosed to reinsurers, regulatory authorities, **our** service providers and third parties for the purposes of administering **your** insurance policy or claim, as well as monitoring compliance with regulatory requirements. **We** may share **your** personal information with other companies within **our** group.

Where this happens, **we** will ensure that anyone to whom **we** send **your** information agrees to treat it with the same level of protection as if **we** were dealing with it.

If **you** provide personal data on behalf of or about another person, **you** confirm that they have given **you** permission to give the information to **us** and **your insurance intermediary** and that **we** and they may process it.

We and **your insurance intermediary** may undertake checks against publicly available information (such as DVLA records for MyLicence checks, electoral roll, county court judgements, bankruptcy orders or repossessions). These checks may be made when **you** take out insurance with **us** or if **you** make a claim and the information shared with anyone acting on **our** behalf to administer **your** insurance policy or a claim (e.g. loss adjusters or investigators).

Credit Searches

To help **us** prevent fraud and to check **your** identity, **we** and **your insurance intermediary** may search files made available to **us** by credit reference agencies, who may keep a record on that search.

How we will use your data

Underwriting Purposes

We will examine the potential risk in relation to **your** prospective or current policy (including anyone else likely to be involved, for example **your** age and the age of any other prospective drivers), so **we** can:

- consider whether to accept the relevant risk;
- make decisions about the provision and administration of insurance policies and related services for **you** (and members of **your** household or company depending on **your** policy type);
- validate **your** claims history (or the claims history of any person likely to be involved in the insurance policy or claim) at any time, including upon application for insurance, in the event of an accident or a claim, or at a time of renewal.

DVLA

This paragraph applies where **you** have agreed **we** may access Driver & Vehicle Licensing Agency 'DVLA' records:

Information will be collected from **you** to enable **us** to examine the potential risk in relation to **your** policy so **we** can provide **your** (or that of any person covered by this policy for whom **we** hold details) Driving Licence Number ("DLN") to the DVLA to confirm **your** (or that of any person covered by this policy for whom we hold details) licence status, entitlement and relevant restriction information, in addition to endorsement/conviction data. Searches may be carried out prior to **you** purchasing cover and, in the event **you** purchase a policy, at any point throughout the duration of **your** insurance policy including at the mid-term adjustment and renewal stage(s). A search of the DLN with the DVLA should not show a footprint against **your** (or that of any person covered by this policy for whom we hold details) driving licence. For details relating to personal information held about **you** by the DVLA, please visit www.dvla.gov.uk.

Motor Insurance Database

Information relating to **your** insurance policy will be added to the Motor Insurance Database ("MID") managed by the Motor Insurers' Bureau ("MIB"). The MID and the data stored on it may be used by certain statutory and/or authorised bodies including the Police, the DVLA, the DVANI, the Insurance Fraud Bureau and other bodies permitted by law for purposes not limited to, but including:

- Electronic Licensing;
- Continuous Insurance Enforcement;
- Law enforcement (prevention, detection, apprehension and or prosecution of offenders);
- The provision of government services and or other services aimed at reducing the level and incidence of uninsured driving;
- If **you** or anyone covered by this policy are involved in a road traffic accident (either in the UK, the EEA or certain other territories), insurers and or the MIB may search the MID to obtain relevant information;
- Persons (including his or her appointed representatives), pursuing a claim in respect of a road traffic accident (including citizens of other countries) may also obtain relevant information which is held on the MID.

It is vital that the MID holds **your** correct registration number. If it is incorrectly shown on the MID **you** are at risk of having **your** vehicle seized by the Police.

You can check that **your** correct registration number details are shown on the MID at www.askmid.com. **You** should show these notices to anyone insured to drive the vehicle covered under this insurance policy.

Claims Management Purposes

In the event of a claim, **we** may need to disclose personal information with any other party involved in that claim, such as third parties involved in the incident, insurers, solicitors or representatives and medical teams (either relating to third parties or appointed by **us**), the Police or other investigators. **We** may also have to investigate **your** claims and conviction history.

Management Information Purposes

We will analyse insurance and other markets for the purposes of: risk assessment, performance reporting, portfolio assessment and management reporting.

Anti-fraud Purposes

Fraud prevention and detection

In order to prevent and detect fraud **we** may at any time:

- Share information about **you** with other organisations and public bodies including the Police; and/or
- Undertake credit searches and additional fraud searches; and/or
- Check and/or file **your** details with fraud prevention agencies and databases, and if **you** give **us** false or inaccurate information and **we** suspect fraud, **we** will record this.

We and other organisations may also search these agencies and databases to:

- Help make decisions about the provision and administration of insurance, credit and related services for **you** and members of your household or company depending on **your** policy type; and
- Trace debtors or beneficiaries, recover debt, prevent fraud and to manage **your** accounts or insurance policies; and
- Check **your** identity to prevent money laundering, unless **you** furnish **us** with other satisfactory proof of identity.

We can, on request, supply further details of the databases **we** access or to which **we** contribute.

Claims history

Under the conditions of **your** policy **you** must tell **us** about any Insurance related incidents (such as fire, water damage, theft or an accident) whether or not they give rise to a claim. When **you** tell **us** about an incident **we** will pass information relating to it to industry databases.

We may search databases when **you** apply for insurance, in the event of any incident or claim, or at time of renewal of **your** insurance policy (if applicable), to validate **your** claims history or no claims bonus or that of any other person or property likely to be involved in the insurance policy or claim; this includes, but is not limited to:

- Claims and Underwriting Exchange (CUE)
- Motor Insurers Anti-Fraud & Theft Register (MIAFTR)

How your data will be processed

Insurance agencies and industry databases

We may pass information to the Claims and Underwriting Exchange Register (CUE) and the Motor Insurers' Anti-Fraud and Theft Register (MIAFTR), run by the Motor Insurers' Bureau (MIB). The aim is to help **us** to check information provided by **you** and also to prevent fraudulent claims. These registers may be searched in considering any application of insurance in connection with the policy. **We** will pass any information relating to any incident (such as an accident or theft), which may or may not give rise to a claim under this insurance policy and which **you** have to notify **us** of in accordance with the terms and conditions of this insurance policy, to the relevant registers.

Other insurers and third party firms

We may pass information about **you** and this insurance policy to other insurance companies with whom we reinsure **our** business or who are dealing with a claim made under this policy. In addition, information may be passed to other insurance related organisations in common with industry practice or other third party firms to perform **our** contract or services. Such companies may be located in countries outside the UK. **We** will not transfer Personal Data outside the EU, unless necessary to perform **our** contract or services and in such circumstances **we** will ensure the Standard Contractual Clauses are in place prior to the transfer taking place. This ensures the similar level of security of **your** data as if it was transferred to a company within the EU.

Information on products and services

Where **we** have relevant consent, **we** may use the details **you** have provided to send **you** information about **our** other products and services or to carry out research. **We** may contact **you** by letter, telephone or email. Please be reassured that **we** won't make **your** personal details available to any companies other than those that are contracted by **us** to provide services relating to **your** insurance contract with **us**. If **you** would prefer not to receive information from **us** or those companies who provide services on **our** behalf, simply tell **our** service provider when **you** call or write to them at:

Head of Risk and Compliance
Collingwood Insurance Services (UK) Limited
Collingwood House
Redburn Court
Earl Grey Way
North Shields
Tyne and Wear
NE29 6AR

Your insurance intermediary

In the event that **we** are unable to continue to trade with **your** insurance intermediary because they have ceased to trade through bankruptcy or liquidation, or in the event that their relevant FCA authorisation is revoked, **we** reserve the right to pass **your** insurance policy and all details on to another intermediary. If you do not wish for this to happen then please put **your** request in writing to **us**.

How long we will keep your data

We will keep **your** personal information for as long as reasonably necessary to fulfil the purposes set out in this notice and to comply with **our** legal and regulatory obligations. **We** have a detailed retention policy in place which governs how long **we** will hold different types of information for. The exact time period will depend on the purpose for which **we** collect that information, for example:

- MyLicence Data for Policies not taken up: no more than 29 days
- Quotes: 6 months
- Policies including MyLicence Data: 7 years
- Claims: 7 years
- Complaints: 7 years

In some circumstances depending on the nature of **your** policy and any claims made under it, data may be retained for a further period. It is retained for as long as a potential claim might be made or whilst a claim is being processed.

Automated Decision Making

We use automated processes to make decisions. These automated processes use data provided by **you**, other records **we** hold about **you** in our systems and data sourced from third parties. For example, this may include driving licence database, claims databases, no claims discount databases and fraud databases.

In order to provide **you** with a price for **your** insurance policy, **we** need to obtain data from **you**. This includes **your** personal information, motor conviction history, claims history and what **you** are looking to insure, for example the vehicle **you** drive.

Once **you** have provided **us** with data, **we** carry out checks to validate this data (e.g. confirming **your** identity) and enrich it with data from third party sources. For example, **we** use the vehicle registration number **you** provided to source additional information on the vehicle **you** drive.

We calculate **your** insurance risk premium using pricing models to assess the data, as part of this we may make predictions on the likelihood that a claim will be made and the likely severity of a claim. This assessment is based on various factors including information about the area **you** live in such as the likelihood of crime and the cost of repairs in **your** area. All insurers will use different weightings to set their price and this is confidential to each insurer.

Once **we** have prepared a full view of **your** profile, **we** may be able to provide you with a price.

We also make automated decisions throughout the life of **your** policy, for example before offering **you** a renewal or when dealing with a claim.

Where **we** make an automated decision using personal data which has a legal or similarly significant effect, **you** have certain rights in relation to that decision. In particular, **you** have the right to receive meaningful information about the logic involved in relation to the decision, the right to human intervention and the right to obtain an explanation of the decision and challenge it. For more information about this right and how to exercise it please see Your rights and your personal data section below.

Your rights and your personal data

You are entitled to receive a copy of the information **we** hold about **you**. A request for personal data is free, unless the request is manifestly unfounded or excessive, in which case a reasonable administration fee may be charged.

We take reasonable steps to ensure that the information **we** hold about **you** is accurate and where necessary up to date and complete. **You** are entitled to ask for any inaccurate personal data held by **us** to be rectified. **You** are entitled, in certain circumstances, to request that **your** personal information held by **us** is erased (subject to meeting certain criteria). Both of these rights are subject to **our** legal obligations under the regulations.

You have the right to restrict or object to the processing of **your** personal data, subject to **our** legal obligations under the regulations. Please note in some circumstances **we** will not be able to cease processing **your** information, for example if **you** have a live insurance contract with **us** or an ongoing claim under **your** insurance contract.

You have the right to data portability which allows **you** to obtain the information previously provided to **us**, in a structured, commonly used and machine readable format. **You** have the right to request for this data to be transmitted to another data controller or processor, where this is possible.

You have the right to object to the processing of **your** personal data in respect to direct marketing or on grounds relating to **your** particular situation at any time.

If **you** have been subject to an automated decision, **you** can request **us** to review it, **you** can request information regarding the logic involved, **you** can request human intervention and if **you** do not agree with the outcome, **you** can ask **us** to review it.

If **you** would like to find out more about **your** data protection rights or exercise any of the rights mentioned above, **you** can contact **our** service provider:

Head of Risk and Compliance
Collingwood Insurance Services (UK) Limited
Collingwood House
Redburn Court
Earl Grey Way
North Shields
Tyne and Wear
NE29 6AR

Email: complianceemail@collingwood.co.uk

If **you** wish to raise a complaint about how **we** have handled **your** personal data, **you** can contact **our** Data Protection Officer:

Data Protection Officer
Collingwood Insurance Company Limited
7.02 World Trade Center
Bayside Road
Gibraltar
GX11 1AA

Email: enquiries@collingwood.gi

If **you** are not satisfied with **our** response or believe **we** are processing **your** personal data in a way which is not in accordance with the law, **you** can complain to the Gibraltar Regulatory Authority at the following address:

Gibraltar Regulatory Authority
2nd Floor
Eurotowers 4
1 Europort Road
Gibraltar
GX11 1AA