

## **Data Protection – Privacy Notice**

### **Introduction**

We recognise our responsibility to treat your personal information with care and to comply with all relevant legislation, in particular the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) – the “legislation”. This notice covers our requirement to provide you with information on how and why we use your personal data and of your rights under the legislation.

### **Data Controller**

We have provided you with a quotation and/or administer your insurance policy and are classed as the “data controller” which means we process your data. The contact details are shown at the foot of this notice. Your data may be passed to other parties, including Insurers, for the purposes of arranging your insurance. These parties could also be data controllers and where necessary will issue their own Data Protection Privacy Notices.

### **Personal Information**

We will use personal information about you mainly to provide you with a quotation from Insurers, arrange and administer your policy if you buy one through us, arrange Premium Finance/Consumer credit if required, inform you about our other products and services and statistical analysis.

Some of the personal information we ask you to provide may be sensitive (special category) as defined in the legislation such as information about your medical history. We can collect such information for insurance purposes without your specific consent but it will only be used for the purposes set out above. If you give us information about another person, in doing so you confirm that they have given you permission to provide it to us and that we may use their personal data in the same way as your own as set out in this notice.

### **Legal Basis for processing your Personal Information**

We are required to have a lawful basis (as defined) in order to process your personal data and the relevant bases which we use are show in the table below.

| <b>Purpose of processing</b>   | <b>Lawful Basis</b>  |
|--|--|
| Providing quotations; arranging and administering insurance policies     | Necessary for the performance of an insurance contract                                       |
| Arranging Premium Finance/ Consumer Credit                               | Necessary for the performance of a consumer credit contract                                  |
| Provision of information on products and services (Marketing)            | Our legitimate interests or your explicit consent  |
| To notify you of changes in our service                                  | Our Legal and Regulatory obligations   |
| To prevent and detect fraud, money laundering and other financial crimes | Our Legal and Regulatory obligations   |
| To meet general legal or regulatory obligations                          | Our Legal and Regulatory obligations   |
| Statistical analysis   | Our legitimate interests – to refine and enhance the products and pricing which we can offer |

### **Marketing**

We may contact you by email, text, telephone, mail or other agreed means to keep you up to date about our products and services. The legislation allows us to do this in our own commercial interests for certain communications with previous customers. In other circumstances we can only do so with your explicit consent. In all cases you can opt out from receiving such communications at any time.

### **Disclosure of your Personal Information**

As a necessary part of providing you with the services described above we may need to disclose your personal data to other third parties. These may include:-

Premium Finance companies, Computer bureaux/Software Houses, Insurers, Other Insurance Intermediaries, Insurance Industry databases, Government databases, Credit agencies, Regulatory authorities, the Police and other law enforcement bodies.

### **Fraud prevention and detection**

To prevent and detect fraud we may at any time:-

1. Share information about you with other organisations and public bodies including the Police.
2. Check and/or file your details with fraud prevention agencies and databases.
3. Undertake credit searches and additional fraud searches

We can supply on request further details of the databases which we use.

### **Credit Search Consent**

To make sure you get the best price and terms for your Insurance, we will use the widest possible range of Insurers available to us including some who now carry out searches of their own to protect customers from fraud and to verify identity. They do this using publicly available data which they obtain from a variety of sources, including a credit reference agency and other external organisations to whom they may need to pass some of your personal information. Their search will appear on your credit report whether or not you take out or renew a policy with them.

As well as these searches, some Insurers may use a credit check to ascertain the most appropriate payment options for you. This credit check will also appear on your credit report whether or not you take out or renew a policy with them.

### **Automated decision making and Profiling (if relevant)**

For our on-line systems we carry out automated decision making to decide whether we can provide insurance to you and at what price. For all our quotation systems we may use external data from Credit agencies, Electoral Roll, etc. to help in decision-making on pricing and risk acceptance. This may be regarded as “profiling” as defined in the legislation. The legislation for both of these requires safeguards in the event that they have a legal or similarly significant effect on individuals. We do not consider that our processing poses such risks but you have rights to further information on these processes as explained below.

### **Retention Period**

Your data will not be retained for longer than is necessary and will be managed in accordance with our data retention policy. In most cases the period will be for a maximum of 7 years following the expiry of an insurance contract unless we are required to retain the data for a longer period due to business, legal or regulatory requirements.

### **Your Rights**

You have the following rights in relation to our processing of your personal data:-

1. The right to be informed about how we use your personal data (This Privacy Notice)
2. The right to see a copy of the personal information we hold about you. (In most cases this will be free of charge)
3. The right to have personal information rectified if inaccurate or incomplete.
4. The right of erasure of your personal information where there is no compelling reason for its continued processing.
5. The right to restrict processing in certain circumstances, e.g. if its accuracy is being contested.
6. The right to data portability which, subject to certain conditions, allows you to obtain and reuse your personal data across different services.
7. The right to object to certain processing including for the purposes of direct marketing.
8. Rights to information in relation to automated decision making and profiling.

### **Contact us/Complaints**

If you have a complaint about how we use your personal information please contact us at the address below. You also have the right to lodge a complaint with the Information Commissioner’s office at any time. For further information on this Privacy Notice, to access your personal information or to exercise any of your other rights, please contact The Data Protection Manager, Gleaming Risk Services Ltd at Wigan Investment Centre, Waterside Drive, Wigan, WN3 5BA or at [martin@gleamingriskservices.co.uk](mailto:martin@gleamingriskservices.co.uk) or at 0330 113 4660