

## **PRIVACY NOTICE**

By submitting any information about you and/or others (in which case you will obtain express consent from those individuals affected and will inform them of how their information is being used) you and they consent to its use as set out in this Privacy Policy.

### **1. Who we are and our approach to your privacy**

Curwins Insurance Services Ltd is authorised and regulated by the Financial Conduct Authority. The privacy and security of your personal information is very important to us so we want to assure you that your information will be properly managed and protected whilst in our hands. Please read this notice carefully as it explains how we collect and use your personal information.

You can ask for further information about our use of your personal information or complain about its use, by contacting our Data Protection Officer **Jacqui Winters** at: **Curwins Insurance Services Ltd, 249 Dean Cross Road, Plymouth, PL9 7AZ**

### **2. What information do we collect and where do we get it from?**

In order for us to provide our services to you and to manage those services we will ask you to share your personal information with us. The circumstances in which we use your information, the reasons why we ask for it and details of how we will use it are explained in section 3 of this notice. The information we collect about you varies depending on your particular circumstances and requirements and may include, for example:

- general information about you such as your name, address, contact details and date of birth;
- information about what and/or who you want to insure, such as vehicle details and named drivers, your home, travel details and companions, commercial details;

- your claims and credit history;
- financial details, such as bank account and card details;
- sensitive personal information, such as your health and criminal convictions;
- information about your use of our website such as your IP address, which is a unique number identifying your computer.

We may collect personal information from the following sources:

- you or someone connected to you as part of a quotation or claim;
- publically available sources of information, such as social media and networking sites;
- third party databases made available to the insurance industry as well as databases where you have given your permission to share information with a third party like us. For more information about these sources, please contact the Data Protection Officer using the details set out in section 1 of this notice;

If you have provided information to us about someone else, you would have confirmed that you have the consent of these individuals to share their personal information with us. You should share this privacy notice with all individuals whose personal information you have shared with us as it may also apply to them.

### **3. Why do we collect this information and how will we use it?**

We may collect and use your personal information under the following circumstances or for the following reasons:

**a) To provide you services relating to an insurance quotation and/or insurance policy such as:**

- assessing your insurance application and arranging your insurance policy, checking databases showing no claims discount entitlement and driving licence records;
- managing your insurance policy including claims handling and issuing policy documentation to you;
- providing you with the services described in your policy documents.

The collection and use of information such as your name, address, date of birth, claims history, what/who you would like to insure, medical conditions for travel insurance and conviction details for motor insurance is necessary to provide you with a quotation and/or policy. Without this information, we will be unable to assess your application and/or provide claims services. Our assessment of your insurance application may involve an automated decision to determine whether we are able to provide a quotation and/or the price. The decisions involve the use of insurer systems and are dependent on the information you provide us (for example: post code, vehicle type and conviction details for motor insurance, health details for travel insurance and/or type of property for home/commercial insurance) to produce a result as to whether we are able to provide a quotation and/or what the relevant price for your policy should be. If you object to an automated decision that is required to determine your insurance premium then we will be unable to provide you with an insurance quotation or renewal.

**b) Where we have a justifiable reason, such as:**

- keeping records about you and our correspondence with you as well as your current and past insurance policies and history of insurance claims. This is so that we can appropriately and effectively manage our relationship with you as well as satisfy any

legal and regulatory obligations we may have to keep such records.

- and detecting fraud, financial crime and anti-money-laundering. We may use your personal information to prevent fraud and in doing so may:
  - collect personal information about you from databases as described in this notice and from publically available sources (such as social media and networking sites);
  - share your personal information with fraud prevention agencies. Your personal information will be checked with and recorded by a fraud prevention agency. If false or inaccurate information is provided and fraud is identified, details will be passed to the fraud prevention agency. This information will be accessed and used by us, law enforcement agencies and other organisations to prevent fraud and money laundering, for example: when checking details on applications for credit and credit related or other facilities; managing credit and credit related accounts or facilities; recording debt; checking details on proposals and claims for all types of insurance; and checking details of job applicants and employees. Other organisations may search the databases held by these fraud prevention agencies when you make an application to them for financial products. If such companies suspect fraud, we will share your personal information with them. The information we share may be used by those companies when making decisions about you. We and other organisations may access and use,

from other countries, the information recorded by fraud prevention agencies;

- share your personal information with operators or registers available to the insurance industry to check information you provide. These include the Claims and Underwriting Exchange Register and Motor Insurance Anti-Fraud and Theft Register. We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents and suppliers;
- (for Motor Insurance only) share it with the Motor Insurance Database (MID) which may be used to establish whether a driver is insured to drive a vehicle and/or for preventing or detecting crime. If you are involved in an accident in the UK or abroad, the MID may be searched to obtain relevant policy information. You can find out more at [www.mib.org.uk](http://www.mib.org.uk);
- use any personal information obtained about you, or anyone you have provided us information about, to carry out the above profiling activity as part of our investigations into fraudulent behaviour. Should fraud be identified as a result of such profiling activity, this could result in the rejection of an application for insurance, a claim and/or voidance of your policy.
- using information collected from databases we use together with the personal information you give us, to help us to improve and develop our internal databases and systems in order to improve the products and services we offer. For more information about how we communicate our products and services, please refer to section 4 of this notice.

- we may anonymise and combine the information you have given us to understand more about you, create new products and services as well as helping us with our marketing.
- We may also use CCTV recording equipment in and around our premises for monitoring and security purposes.

#### **c) You have given us your permission:**

- to use your sensitive personal information in order to provide you with a quotation, price and/or the services set out in your policy documents for example: handling claims or for making reasonable adjustments as a result of a disability you have told us about or your religious beliefs. Where you have provided sensitive personal information about someone connected to you, for example named drivers, you would have confirmed that you have their permission to share this information with us;
- to use personal or sensitive information about a child in order to provide you with a quote related to travel insurance or fulfil the services outlined in your policy documents, such as handling a claim.

#### **d) For details about how we use your information to communicate our similar products and/or services, your use of our websites and email communications, please refer to section 4 of this notice.**

#### **4. How we communicate with you about our similar products and services and information about your use of our website**

We will contact you, in order to communicate our products and/or services to you which we believe may be of interest to you and which relate to your general insurance needs.

There may be times when we will require your permission to provide information about products and services to you, such as:

- where the product or service is not similar to those that we currently provide to you but we believe you may be interested in it; or

- when you have opted out of us sending details of or contacting you in relation to the products and services we offer.

We may communicate with you by post, email, SMS, telephone and/or digital methods such as social media and online advertising, unless you have told us you do not want us to. Where you no longer hold a policy with us or we have provided you with a quote in the past, we will keep you informed about our products and services for a period of up to 3 years if contacting you by telephone or for up to 5 years if contacting you via other means.

We may look to develop and enhance the information we hold about you with the aim of improving our product and service offerings and how we communicate these to you, where you have given us permission or where we believe that our products and service may be of interest to you. We may collect personal information about you which, when combined with the personal information you have given us, helps us to target and tailor communications which we believe may be more relevant to you. For further information about the third party databases we use, please contact the Data Protection Officer using the details set out in section 1 of this notice.

#### **Use of your personal information when using our websites and email communications:**

When you visit our website we may collect information from you such as, your email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit. We use third parties to collate IP addresses to help us understand our Internet traffic data and data regarding your browser type and computer.

The open nature of the internet is such that data may flow over networks without security measures, and may be accessed and used by people other than those for whom the data is intended. Whilst this is outside of our control, we do take the protection of your information

very seriously and aim to apply appropriate levels of security at all times.

#### **5. Who might we share your information with?**

We may share your personal information with:

- organisations that have a specific role laid out in law such as statutory bodies, regulatory authorities and other authorised bodies;
- other organisations where we have a duty to or are permitted to disclose your personal information by law (e.g. if we received a valid request from the police or other third party organisation in the interest of preventing and detecting crime);
- fraud prevention agencies and operators of registers available to the insurance industry to check information and prevent fraud. This is outlined in more detail under section 3 of this privacy notice;
- credit reference agencies to check your credit history. This check will be recorded on your credit reference file without affecting your ability to apply for credit or other financial products;
- third parties we use to recover money you may owe us;;
- another company, if our business or part of it is bought or taken over by that company to ensure your insurance policy can continue to be serviced or as part of preliminary discussions with that company about a possible sale or take over;
- other third parties if you have given us your permission to do so or there is sufficient reason to believe they are acting on your behalf.

Unless required by law, we would never share your personal data without the appropriate and necessary care and safeguards being in place.

#### **6. How long will we keep your information?**

We will keep your information only for as long as is reasonably necessary for the purposes set out in this

privacy notice and to fulfil our legal and regulatory obligations. For further information about how long we will keep your information, please contact the Data Protection Officer using the contact details outlined in section 1 of this notice.

#### 7. **How will we deal with others acting on your behalf?**

To help manage your insurance policy we will deal with individuals you nominate, including third parties we reasonably believe to be acting on your behalf provided they are able to answer our security questions. However, for your protection, we will need to speak to you directly, your legal representative, someone you have nominated and given us permission to discuss your personal details, or power of attorney should you require changes to your contact address, policy coverage or to cancel the policy.

#### 8. **Your rights**

You have a number of rights concerning the personal information we use, these include the right to:

- ask for access to and a copy of your personal information;
- ask us to correct or delete the personal information;
- ask us to restrict or object to the use of your personal information at any time;
- where you have previously given us your permission to use your personal information,

withdraw that permission. Where your permission is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you do not wish us to contact you again;

- complain to the Information Commissioner's Office at any time if you object to the way we use your personal information. For more information please go to [www.ico.org.uk](http://www.ico.org.uk);
- object to an automated decision including profiling. For details about the profiling activity we undertake, please refer to section 3 of this notice.

To discuss your rights or make a request, please contact the Data Protection Officer using the details outlined in section 1 of this notice.

Please note that in some cases even when you make a request concerning your personal information, we may not be required, or may not be able, to honour it as this may result in us not being able to fulfil our legal and regulatory obligations or there is a minimum statutory period of time for which we have to keep your information. If this is the case then we will let you know our reasons.