

## Vision Vehicle Solutions Limited

### **PRIVACY POLICY: HOW WE USE YOUR INFORMATION**

Vision (“we, us, our”) is a trading name of Vision Vehicle Solutions Limited are committed to protecting your privacy. We take great care to ensure your information is kept safe and secure.

This policy explains how we will collect, store, use and share your personal information. We collect information in a number of ways including when you use our website, a third party website, submit an application form or provide information to us by post, email, phone or text.

#### **About us**

We are Vision Vehicle Solutions Limited and we are part of the Markerstudy Group of companies. We can be contacted at Vision Vehicles Solutions, Waterside House, Riverside Way, Uxbridge, UB8 2YF

Privacypolicy@visionvehicles.co.uk

Vision is an accident management company and established provider of credit hire and intervention hire, to motorists involved in road traffic accidents. We use our expertise in the motor insurance industry to provide a comprehensive and seamless service, from first point of contact to returning the hire vehicle.

#### **Explanation of some of the terms used**

**Data Controller** – means the person or entity which alone or jointly with others determines the purposes and means of the processing of personal data

**Data Protection Law** – the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998/2018.

**Markerstudy Group** – details of the Markerstudy Group can be found at [www.markerstudygroup.com/about\\_us](http://www.markerstudygroup.com/about_us)

**Sensitive Information** – this is also known as **Special Category Data** and includes information revealing, or about a person’s racial or ethnic origin, political opinions or trade union membership, religious or philosophical beliefs, health, sex life or sexual orientation, or genetic data and biometric data for the purpose of uniquely identifying a natural person. Information about criminal convictions is often included in this definition.

#### **Data Controllers**

For the purposes of the data protection law the data controller for the services we provide to you will be Vision Vehicle Solutions Limited. We are registered with the ICO, registration number Z7647863.

If you have engaged with us as a result of our partnership with brokers, body shops, insurance companies, solicitors, recovery agents, claims management companies and vehicle manufacturers then that third party will also be a data controller for the purposes of data protection law.

Depending upon the types of ancillary services you have decided to receive during your quote or renewal journey, other companies may also be considered a data controller in respect of those ancillary services. More information about third parties can be found in the ‘*Who do we share the information we collect about you with?*’ section below.

Where a third party data controller is involved in the provision of the insurance and ancillary services to you, we recommend that you also review their privacy policy as this will tell you how they will process your information.

### **Data Protection Officer**

We have appointed a Data Protection Officer to oversee our handling of personal information. Our Data Protection Officer can be reached at [dataprotection@markerstudy.com](mailto:dataprotection@markerstudy.com).

Please click on the relevant section below for detailed information regarding how we process your information.

### **Who do we collect information about?**

We collect information about the following types of individuals:

- Previous and current customers
- Previous and current parties covered under an insurance policy we administer, place or underwrite
- Person's authorised to speak to us on behalf of a customer
- Third party claimants
- Witnesses to incidents
- Experts instructed in relation to claims
- Business Partners

### **When do we collect information about you?**

We collect information about you:

- When you contact us to request our services
- On a claim under a policy
- When you contact us (by phone, email, through our website or otherwise) such as to update or check your details, complete surveys, provide feedback, fill in forms, participate in competitions or complete applications for insurance policies or other goods/services.
- When you register to use our website, subscribe to our services, search for a product, place an order on our website, participate in discussion boards or other social media functions on our website, leave any query or correspondence on our website, enter a competition, promotion or survey or when you report a problem with our website or any other activity undertaken with the Markerstudy group.
- From third party databases (for example claims underwriting exchange and government agencies)
- When you contact us to make a complaint.
- From third parties who are involved with the management and resolution of your claim/ accident

### **What information do we collect about you?**

Please see below for detailed information regarding the types of personal information we are likely to collect and use about you.

If you provide personal information to us about other individuals you agree: (a) to inform the individual about the content of this Privacy Policy; and (b) to obtain any consent where we indicate that it is required for the processing of that individual's personal data in accordance with this Privacy Policy. Please see below for detailed information regarding the types of personal information we are likely to collect and use about you.

### ***Personal Information:***

- General information such as your name, address, date of birth, email address and phone number
- Vehicle Registration Number
- Details of previous claims or services provided by us
- Identification information such as national insurance number and passport number
- Financial information such as payment card, bank account information and HPI checks
- Personal description when necessary for the administration of the claim (for example as part of a claim investigation)
- Photograph, mobile phone, video footage or CCTV
- Your driving licence details and driving history which may include tracking information or telematics information
- Details about you and your personal circumstances where this is appropriate in the administration of your claim for example information to allow us to identify a potentially vulnerable customer, to record your occupation as well as other information you (or a third party) may provide to us as part of the claim administration processes whether through phone, email, letter, or via a website, social media or online chat.
- We may collect information when you use our website including data that allows us to monitor your preferences and how you use our website. This helps us to organise our website content in order to improve your experience. The information we collect includes:
  - details of transactions you carry out through our website.
  - information that you provide by filling in forms on our website even if those forms are not submitted.
  - technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
  - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time)
  - products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- We may use cookies to collect information about how our website is used. Please see our [cookies policy](#) for more information about our use of cookies.

***Special Category (sensitive) Personal Information and Criminal Personal Information:***

- Information relating to your criminal history (including offences and alleged offences and any caution, court sentence or criminal conviction) for the purposes of fraud prevention investigations
- Other than as noted above, we do not actively request details about sensitive personal information. However it may be recorded if it is provided by you (or a third party) as part of the service administration process whether through phone, email, letter, or via a website, social media or online chat.

**How do we collect your information?**

We collect personal information from a number of different sources including:

- Directly from you or from someone else on your behalf by website, phone, email, SMS, paper documents or in person.
- From third parties (including brokers, body shops, insurance companies, solicitors, recovery agents, claims management companies and vehicle manufacturers)
- From other resources, for example, public databases, websites, other sources including HPI
- Other publically available sources, including ,but not limited to, Google Earth and social media
- Through customer surveys
- Via insurance industry fraud prevention and detection databases, as well as sanctions screening tools.
- From government agencies such as HMRC and from professional regulators.

## What are the purposes for which information about you is used?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing. When the information that we process is classed as special category or sensitive personal information, we must have an additional legal ground for such processing.

Whether you provide us with the information, or we collect information from you or we are provided with information from other sources, we may use this information:

### **a) To provide the contracted service**

**Legal grounds:**

- Our having an appropriate business need to use your information to provide insurance which does not overly prejudice you.
- Our providing your contract.

**Additional legal ground for sensitive personal information:**

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

### **b) To provide and manage your claim**

**Legal grounds:**

- Our having an appropriate business need to use your information to manage an insurance contract and claim which does not overly prejudice you.
- Our providing services under an insurance contract.

**Additional legal ground for sensitive personal information:**

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts
- The use is necessary in order for us to establish, exercise or defend our legal rights

### **c) Communicating with you and resolving any complaints that you might have**

**Legal grounds:**

- Our providing your contract
- Our having an appropriate business need to use your information to manage and respond to complaints which does not overly prejudice you

**Additional legal ground for sensitive personal information:**

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.
- The use is necessary in order for us to establish, exercise or defend our legal rights

### **d) To transfer to third parties for the purpose of providing you with the services required under the contract or other services which you have elected to receive from us in connection with the insurance contract.**

**Legal grounds:**

- Our providing contracted services

***Additional legal ground for sensitive personal information:***

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

**e) To transfer to third parties where you have elected to enter into a contract with that third party for separate services.**

***Legal grounds:***

- You have provided your explicit consent to allow us to provide the third party with your details to enable you to enter into a contract with that third party.

***Additional legal ground for sensitive personal information:***

- You have provided your explicit consent to the provision of these additional services which necessitate the transfer of sensitive personal information.

**f) Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.**

***Legal grounds:***

- Our providing your contract
- Our having an appropriate business need to use your information to ensure fraud is detected which does not overly prejudice you

***Additional legal ground for sensitive personal information:***

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts

**g) Complying with our legal or regulatory obligations**

***Legal grounds:***

- The use is necessary in order for us to comply with our legal obligations

***Additional legal ground for sensitive personal information:***

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.
- The use is necessary in order for us to establish, exercise or defend our legal rights

**h) Recover outstanding payments**

***Legal grounds:***

- Our having an appropriate business need to use your information in order to recover debts which does not overly prejudice you

***Additional legal ground for sensitive personal information:***

- The use is necessary in order for us to establish, exercise or defend our legal rights

**i) To improve our customer service**

***Legal grounds:***

- Our having an appropriate business need to use your information in the improvement of our customer service which does not overly prejudice you

**j) To measure the effectiveness of our advertising**

**Legal grounds:**

- Our having an appropriate business need to use your information to ensure our advertising is effective which does not overly prejudice you

**k) To provide data analysis in order to assist us with the pricing of our products and detect market trends.**

**Legal grounds:**

- Our having an appropriate business need to use your information which does not overly prejudice you.

**l) To personalise your repeat visits to our website and to improve our website, including as part of our efforts to keep our website safe and secure**

**Legal grounds:**

- Our having an appropriate business need to use your information which does not overly prejudice you.

**m) To notify you about changes to our services or products**

**Legal grounds:**

- Our having an appropriate business need to use your information to keep our customers up to date with changes to our products or services which does not overly prejudice you.

**n) To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes**

**Legal grounds:**

- Our having an appropriate business need to use your information to maintain our websites which does not overly prejudice you.

**o) To allow you to participate in interactive features of our services / website**

**Legal grounds:**

- Our having an appropriate business need to use your information to offer an interactive website for customers which does not overly prejudice you.

**p) Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics**

**Legal grounds:**

- we have a legitimate business need to provide secure and quality services

**Additional legal ground for sensitive personal information:**

- where appropriate we apply an exemption for Insurance purposes

**Who do we share the information we collect about you with?**

**Sharing within our Markerstudy Group**

We may share your information within the Markerstudy Group for the following reasons:

- To notify and provide updates to your insurer or administer in management of your claim (including where we act as an administrator for a Group company or the group insurance managing agent);

- To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our website, including as part of our efforts to keep our website safe and secure
- For legal, financial reporting and regulatory purposes.

### ***Sharing with third parties***

We may also share your information with selected third parties, in order to offer services to you or to perform any necessary functions on our behalf. This may include:

- Your relatives, executors or, guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with the claim such as your insurance broker or your lawyer
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your claim with us and make decisions on your behalf.
- Other third parties involved in the incident giving rise to the service e.g. the third party insurance company, claims administration company or solicitors
- We may share the personal information of any persons named on the policy with third parties if relevant for the administration of the claim
- Other third parties you have asked us to engage with
- Loss Adjusters
- Emergency Assistance Companies
- Solicitors
  - To manage claims (whether you are an insured or a third party claimant)
  - To manage legal cases brought against us or on our behalf
  - To manage regulatory investigations
- Business partners
  - Companies you have agreed may receive your information to allow you to enter into a contract with them (for example solicitors)
- Suppliers
  - Companies engaged by us to provide contracted services. This is a wide ranging list of companies and their use will depend upon the circumstances. For example,
    - To allow us to record our incoming and outgoing calls with you
    - in the event of a claim we may engage the services of recovery agents, car hire companies, mechanics or body shops, .
- Debt Collectors
- Survey companies

Disclosure of your personal information to a third party outside of the Markerstudy Group will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also share your information with:

- Search engine operators who can assist us in the improvement of our website.
- Prospective buyers, in the event that we sell any business or assets.
- Regulators and other authorised bodies, whenever we are required to do so by law.
- We believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

### ***Claims Checks***

We may also share your information with organisations that can check your claims history.

### **What is our approach to sending information overseas?**

We seek to ensure that data which is processed on our behalf as data controller is retained within the EEA but this is sometimes difficult (for example a UK supplier may have a server based outside of the EEA).

If we make a transfer of your personal information outside of the EEA we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards.

### **How long do we keep personal information for?**

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our contractual, legal and regulatory obligations.

We have implemented a Document Retention Policy which records of details how long various types of information should be retained. The Policy is reviewed on a regular basis to ensure that it aligns to current legal and regulatory requirements. The retention periods vary depending upon the circumstances of an individual matter but in general our retention periods for customer facing documentation can be set out as follows

Claims Documents	7 years from date of last settlement /order
Complaints	3 years from the complaint being resolved

If you would like further information regarding the periods for which your personal information will be stored, please see the contact details outlined in the "How to Contact Us" section below.

### **Automated decision making**

We do not use automated decision making

### **What marketing activities do we carry out?**

We do not actively market our products & services to policyholders or prospective customers. Please note that other companies within the Markerstudy Group of Companies may market to you for different products and services. Please refer to their privacy policy.

### **Your rights**

Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in the "How to Contact Us" section of this Privacy Policy.

Please note:

- In some cases we may not be able to comply with your request (e.g. we might not be able to delete your data) for reasons such as our own obligations to comply with contractual, legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.
- In some circumstances exercising some of these rights (including the right to erasure, the right to restriction of processing and the right to withdraw consent) will mean we are unable to continue providing you with the service and you may be required to pay a cancellation fee in accordance with your credit agreements.

### **The right to access your personal information**

You have the right to access a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests.



### **The right to rectification**

We take reasonable steps to ensure that the personal information we hold about you is accurate and up to date. However, if you do not believe this is the case, you can ask us to update or amend it.

### **The right to erasure**

In certain circumstances, you may ask us to erase your personal information.

### **The right to restriction of processing**

In certain circumstances, you are entitled to ask us to stop using your personal information.

### **The right to data portability**

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice.

### **The right to object to marketing**

You can ask us to stop sending you marketing messages at any time.

### **The right not to be subject to automated decision-making (including profiling)**

You have a right not to be subject to automated decision-making (as described above) and where automated decision-making is used in the assessment of your application or fraud prevention, you can contact us to request that any declined decision is reconsidered. If you want to opt out of automatic decision-making, let us know, although in some circumstances it may mean we can't offer you a quote or policy as some automated decisions are necessary to provide your insurance policy.

### **The right to withdraw consent**

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

### **The right to lodge a complaint with the ICO**

You have a right to complain to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations.

More information can be found on the ICO's website at: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

Making a complaint will not affect any other legal rights or remedies that you have.

### **How we protect your information**

We want you to have confidence in how we use and hold your data. We know that to achieve this we must preserve the security and confidentiality of your personal information. We have therefore developed a range of organisational, procedural and technical security measures designed to protect your personal information from unauthorized use or disclosure. Examples of some of these measures include:

- User and privileged account management including appropriate policies for password complexity, length and history.
- Auditing of system users and administrators.
- Regular backup schedules and disaster recovery environment for key systems and services.
- Secure file transfer methods are used to encrypt data.
- Usage of data loss prevention tools within the Group.

- Data breach detection: Security tools in place to detect unusual or abnormal activity.
- Data breach investigation: Audit and logging tools used to investigate any potential or reported breaches.
- Data breach response: A plan that pulls together our compliance, legal and IT security teams to ensure rapid assessment and mitigation of data breaches

### **Changes to our Privacy Policy**

We keep our Privacy Policy under review and it is updated periodically. For example, those changes may be due to government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on: 30<sup>th</sup> March 2018

### **How to Contact Us**

Please contact us if you have any questions about our Privacy Policy or to exercise any of your rights

Data Protection Officer,  
45 Westerham Road,  
Sevenoaks,  
Kent  
TN13 2QB.

Or by email to [dataprotection@markerstudy.com](mailto:dataprotection@markerstudy.com)

Where you have made the request by electronic means, the information will be provided to you by electronic means where possible.

### **Other websites**

Our website may contain links to other websites. This Privacy Policy only applies to our own website so when you link to other websites you should read their own privacy policies. If this policy conflicts with any written contract that we have with you then the written contract shall take precedence.

### **Complaints**

If you have a complaint about how we use your information then please contact us at:

Data Protection Officer,  
45 Westerham Road,  
Sevenoaks,  
Kent  
TN13 2QB.

If you have a complaint about the way in which your data has been processed, you can contact the ICO at: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).