

Insurance Factory Limited – Motor and Home

PRIVACY POLICY: HOW WE USE YOUR INFORMATION

Insurance Factory Ltd (“we, us, our”) is 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 Insurance Factory Limited and we are part of the Markerstudy Group of companies. We can be contacted at 45 Westerham Road, Bessels Green, Sevenoaks, Kent TN13 2QB

We offer different types of insurance products and this privacy policy relates to our Motor and Home Insurance Policies (including policies with telematics)

You can find our Pet and Equine Insurance Privacy Policy and our Ancillary Products Insurance Privacy Policy through our website <https://www.insurancefactory.co.uk/>

We offer our Motor and Home policies under a number of brands including Equesure, Insurance Choice, Insurance Factory, Lancaster, Mobilers, Masterquote, Reis, Motorhome Protect, Musketeers and the Taxi Insurer

We, together with our group companies within Markerstudy Group provide insurance and associated services to our customers. We work with insurance companies to provide you with your insurance policy.

Explanation of some of the terms used

Aggregator – quote comparison websites such as ‘gocompare’/ ‘comparethemarket’

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

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 Insurance Factory Ltd. We are registered with the ICO, registration number Z7031675

When you take out an insurance policy then the third party Insurer will also be a data controller for the purposes of data protection law.

If you have elected to have a Telematics Unit, Smart Drivers Club Limited is also a Data Controller in respect of the data collected via that unit. It will also act as a processor for us in respect of some data.

Depending on how you were introduced to us there may be other companies who will also be considered a data controller. This could include, for example: a broker you have used to provide you with quotes; a company who has appointed us to provide insurance services on their behalf; e.g. aggregators.

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.

Who do we collect information about?

We collect information about the following types of individuals:

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

Telematics Specific

- Drivers of the vehicle, although we will not know who is driving the vehicle at any particular time

When do we collect information about you?

We collect information about you:

- When we are providing you with a quotation when you apply for amend or renew a policy.
- 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 quote or renewal journey, for example a broker that you use to find your insurance or an aggregator site

Telematics Specific

- The Telematics systems normally collect information while your vehicle is being used and transmit this to us and/or our suppliers some time later. Instances where the Telematics systems may send real-time data and alerts to us include where a collision or crash is detected, if the device's tamper alerts are activated, or if it is at your request, for example if your vehicle has been stolen and a Theft Tracking service has been activated or you request the last known location of your vehicle.

What information do we collect about you?

The personal information that we collect will depend on your relationship with us. We will collect different information depending on the type of policy you are taking out with us, whether you are a policyholder, covered party or beneficiary under a policy, website user, claimant, witness, expert, broker or other third party.

Please note, in certain circumstances we may request and/or receive sensitive personal information about you. For example we may need access to health records or details of any unspent criminal convictions for the purposes of providing you with a policy or processing claims, or for preventing, detecting and investigating fraud.

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 policies or quotes between you and us or between you and a member of the Markerstudy group/ Other Insurers
- Identification information such as national insurance number and passport number
- Financial information such as payment card or bank account information and information which is pertinent to the administration of the quote, policy or claim (for example whether you are a homeowner, credit score, county court judgements and bankruptcy for our commercial policies details of any prior involvement you have had with other companies who have ceased trading)
- Personal description when necessary for the administration of the policy (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
- information relevant to your claim or your involvement in the matter giving rise to a claim
- where applicable, information about the nature of your business and commercial assets
- Details about you and your personal circumstances where this is appropriate in the administration of your quote, policy or claim for example information to allow us to identify a potentially vulnerable customer, to record your marital status, occupation, home owner status, as well as other information you (or a third party) may provide to us as part of the quote, policy and /or claim administration processes whether through phone, email, letter, or via a website, App, social media or online chat.
- Information relevant to the scope of the quote or policy such as (for our motorsports policies) any relevant race licence or (for our commercial policies) required business licences,

affiliations, memberships of regulatory bodies or professional qualifications, information about your travel plans, destination and planned activities.

- Location at time of policy purchase
- 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](https://resources.markerstudy.com/retail/insurance-factory/cookies-policy/) (https://resources.markerstudy.com/retail/insurance-factory/cookies-policy/) for more information about our use of cookies.

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

- Details about your health but only if this information is pertinent to (i) the quote (for example medical conditions which are notifiable to the DVLA or for our travel policies relevant health history) , (ii) policy administration (for example to help us to identify a potentially vulnerable customer), (iii) a claim (for example to establish the quantum of damages sought and potentially recoverable under the policy) and (iv) our fraud prevention investigations.
- Information relating to your criminal history (including offences and alleged offences and any caution, court sentence or criminal conviction) but only if this information is pertinent to (i) the quote process (ii) policy administration (for example when you update us of any changes to your driving licence) and (iii) fraud prevention investigations.
- Information relating to any professional disciplinary action that you are or have been the subject of where this is pertinent to a commercial quote, policy or claim.
- We do not actively request details about your race and/or ethnicity but this information may be recorded if it is pertinent to (i) a claim (for example a physical description is given at the time of the incident resulting in the claim or in a later medical report or investigator report), (ii) a complaint (for example an allegation is made by you of racial discrimination) or (iii) our fraud prevention investigations. It may also be recorded if it is provided by you (or a third party) as part of the quote, policy and /or claim administration processes whether through phone, email, letter, or via a website, App, social media or online chat.
- We do not actively request details about your political opinions, religious or philosophical beliefs or trade union membership but this information may be recorded if it is provided by you (or a third party) as part of the quote, policy and /or claim administration processes whether through phone, email, letter, or via a website, app, social media or online chat.
- We do not actively request details concerning your sex life and/or sexual orientation but this information may be recorded if it is provided by you (or a third party) as part of the quote, policy and /or claim administration processes whether through phone, email, letter, or via a website, App, social media or online chat. In addition this information may be apparent from other information you have provided (for example details of your spouse if he/she is a named driver on the policy). Further this information may, in certain limited circumstances, be recorded in a medical report if that information is pertinent to a claim under the policy.

Telematics Specific

- The unit will be used to capture; date, time, speed, location and other associated vehicle and driving related information from your vehicle. This information includes: date,

time, latitude, longitude, speed, duration, distance, acceleration, braking, cornering and other associated vehicle information, including vehicle performance data.

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, on line chat, paper documents or in person
- From the Telematics Unit ((Smartplug™)
- From your company website
- From our records
- From other companies within the Markerstudy Group.
- From third parties (including brokers, aggregators, insurance companies, business partners, suppliers, payment and delivery services, third party claimants under a policy, medical representatives in the event of a claim, accident management companies, advertising networks, analytics providers, search information providers and credit reference agencies).
- From other resources, for example, risk assessment models, pricing data, statistics and other information from public databases, websites and other sources, including aggregator websites.
- Other publically available sources, including ,but not limited to, Google Earth and social media
- Through customer and broker 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 evaluate your insurance application and provide (and follow up) a quote

Legal grounds:

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

Additional legal ground for sensitive personal information:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law

b) To set you up as a policyholder including carrying out fraud, credit and anti-money laundering checks

Legal grounds:

- To carry out our obligations arising from any insurance contract entered into between you and us

Additional legal ground for sensitive personal information:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law,
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts

c) To evaluate your application and ability to pay for your policy by instalments (if applicable)

Legal grounds:

- Such use is necessary in order to provide your insurance policy

Additional legal ground for sensitive personal information:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law

d) To provide and manage your insurance policy and to provide you with a renewal quote when your policy is due to expire

Legal grounds:

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

Additional legal ground for sensitive personal information:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law

e) To provide and manage your claim (whether we are your insurers, we are acting for your insurer or whether you are a third party making a claim against us or a third party insurer for whom we act).

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 an insurance contract.

Additional legal ground for sensitive personal information:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law
- 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

f) Communicating with you and resolving any complaints that you might have

Legal grounds:

- Our providing your insurance 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:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law
- The use is necessary in order for us to establish, exercise or defend our legal rights

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

Legal grounds:

- Our providing the insurance contract
- Our providing other contracted services

Additional legal ground for sensitive personal information:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law

h) 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.

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

Legal grounds:

- Our providing your insurance 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:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts

j) 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:

- the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law
- The use is necessary in order for us to establish, exercise or defend our legal rights

k) 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

l) To provide you with information about goods or services which we offer under our brands and which we feel may interest you, including news updates and details of special offers (further details are provided in the 'Marketing' section below)

Legal grounds:

- You have provided your explicit consent which can be withdrawn at any time.

m) 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

n) 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

o) 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.

p) 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.

q) To notify you about changes to our services or products and /or to send you our newsletters or service bulletins to keep you up to date and informed

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 (or related topics) which does not overly prejudice you.

r) 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.

s) 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.

t) To transfer within the Markerstudy Group or to third parties for the purpose of conducting internet analytics.

Legal grounds:

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

u) For analytical purposes and to improve our products and services. Where possible we will anonymise such information.

Legal grounds:

- We have a legitimate business need to use your personal information for services improvement

v) 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:

the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law

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 obtain a quote;
- To administer and manage the insurance contract (including where we act as an administrator for a Group company or the group insurance managing agent);
- To provide you with services required as part of insurance contract for example through our claims management company or Auto Windscreen as required;
- To provide data analysis in order to assist us with the pricing of our products and detect market trends;
- Where you have given your explicit consent, for marketing purposes;
- 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
- To allow invoicing and to recover any outstanding payments;
- For legal 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, executor or guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with you such as your insurance broker
- 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 policy (including claims and cancellation) with us and make changes on your behalf.
- Our insurance partners such as brokers, other insurers, reinsurers or other companies who act as insurance distributors
- Other third parties who assist in the administration of insurance policies such as another Insurance Company if there has been an accident which requires a claim to or from that Insurance Company
- We may share the personal information of any persons named on the policy with third parties to obtain information which may be used by us to inform its risk selection, pricing and underwriting decisions
- Other third parties you have asked us to engage with
- Passing information to a third party for the purpose of validating your No Claims Discount (NCD) entitlement and this may be made available to other insurers
- Overseas assistance companies
- Loss Adjusters
- Clubs or Groups that you have elected to join (for example car club)
- Engineers
- Emergency Assistance Companies
- Your healthcare practitioner

- 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
 - Software Providers; who provide the technical infrastructure to allow us to provide your quote, policy and claims administrations
 - Aggregators (when you have used their website to obtain our quote): to verify the policies obtained through their sites
 - Clients: for whom we provide insurance policy and administration
 - Companies you have agreed may receive your information to allow you to enter into a contract with them (for example, reward schemes or claims management companies)
- Suppliers
 - Surveyors
 - 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,
 - Printing of invoices and policy documents
 - 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, gadget/device repair companies, house builders or other house repairers
 - Companies engaged by us to provide aspects of our communications with you (for example, web hosting, online chat provider),
- Credit reference agencies
- Debt Collectors
- Finance Providers
- Enquiry Agents/ Counter Fraud Investigators and fraud databases
- Survey companies
- Data analytics advisors
- Query search engine operators

Telematics Specific

- Smart Club Drivers Club who may in turn provide your data to other insurers to evaluate a future application for insurance . Please review their privacy policy which you can find at www.smartdriverclub.co.uk/
- Calamp –may process telematics data to provide the Smartdriverclub services
- Trakm8 –may process telematics data to provide the Smartdriverclub services
- Action 365 Limited –may process your personal data to provide the Smartdriverclub services on our behalf
- Close Brothers Premium Finance – if you apply for finance to pay for your insurance premium
- SI Digital – provide technology services for us and as a part of this they may process your personal data to allow us to provide an insurance quotation for you and assist us with data intelligence services

Information collected and shared when you make a claim

If necessary, we may also have to investigate your claims and conviction history in the course of administering a claim you have made under your policy with us. In the case of motor insurance, insurers pass information to the Claims Underwriting and Exchange Register (CUE), run by Insurance Database Services (IDS) and the Motor Insurance Anti-Fraud and Theft Register, run by the Association of British Insurers (ABI). This helps insurers check information and prevent fraudulent claims. When we deal with your request for insurance, we may search these registers. Under the conditions of your policy, you must tell us about any incident (such as an accident or theft) which may give rise to a claim. When you tell us about an incident, we will pass information to the Registers.

Information relating to your insurance policy will be added to the Motor Insurance Database ("MID") managed by the Motor Insurers' Bureau ("MIB"). 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 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.

Credit reference checks

In order to process your application, we may perform credit and identity checks on you with one or more credit reference agencies ("CRAs").

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organizations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at <https://www.transunion.co.uk/crain>. CRAIN is also

accessible from each of the three CRAs – clicking on any of these three links will also take you to the same CRAIN document:

Call Credit:

- www.callcredit.co.uk/crain

Equifax

- www.equifax.co.uk/crain

Experian:

- www.experian.co.uk/crain

Fraud prevention and detection

In order to prevent and detect fraud we may, at any time share information about you with our other group companies and with third party fraud detection databases. If false or inaccurate information is provided and fraud is identified details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information.

We and other organisations may also access and use this information 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
- recovering debt
- checking details on proposals and claims for all types of Insurance

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.

What is our approach to sending information overseas?

We may send your data outside the European Economic Area (EEA) if we are required to do so for a joint data controller (for example if an insurer is based 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

Quote Information	13 months
Policy Documents	7 years from cancellation of policy (Some policies have a longer retention as required by regulation)
Claims Documents	7 years from date of last settlement /order (This period may be extended if the claim involves a minor or the accident resulted in catastrophic injuries)
Complaints	3 years from the complaint being resolved or the policy retention period whichever is the longer

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

Some of our decisions are made automatically by inputting your personal information into a system or computer and the decision is calculated using certain automatic processes rather than our employees making those decisions. We may make automated decisions in the following situations:

Deciding your premium

We use the personal information that you and others provide to us about you, your family (if applicable to the insurance), property, where you live, and other non-personal information to determine your premium and eligibility. The price also depends on what options you have chosen to purchase. We also use information about how long you have been a customer, quote history, telematics data (if applicable) how many claims you have made and how much you pay in premiums to determine what terms you are offered at renewal.

Fraud prevention

We use computers to automatically run fraud and money-laundering checks which helps us to decide:

- whether someone might pose a fraud or money-laundering risk
- whether their behaviour is similar to that of known fraudsters or money launderers
- is inconsistent with information we already have about them
- if we think they are hiding their true identity

Approving your application

We may use scoring methods to assess and approve or decline your application, to verify your identity and determine finance charges, for example;

Examples of information used by our systems to do this include: your age, your postcode, your driving history. If you do not consent to us processing this information in this way, we may be unable to assess your application or offer you cover.

We use individual credit information about you provided to us by third parties in order to assess your suitability for insurance, the price we offer to you and the method of payment. The information used to assess your insurance risk includes: verification of your residence at address via bills and electoral roll, historic payment behaviour on financial products, prior insolvency and any prior county court judgements. If we are unable to validate your residence at the insured address or consider your historic payment behaviour with creditors to be significantly adverse we may vary our payment method or we may have to decline to offer you a price for your insurance risk.

Auto Renewal

We will ask you when you purchase your policy if you would like to opt in to auto-renewal. However, even if you opted in at this point, you have the right to opt out at any point.

You have rights not to be subject to automated decision making; please see the 'quote *your rights*' section below

Telematics Specific

We will also use the Telematics Data collect to determine whether we wish to offer you a further policy and if so the applicable premium. Some aspects of this assessment are completed automatically

What marketing activities do we carry out?

You are in control of whether we can use your personal information for marketing. We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving.

When we engage with you, we will ask you (on our website, by email or when we speak to you) whether you want us to contact you with marketing information that we think might interest you and if so by what method (email, phone, post, SMS).

We may send this information to you directly or via third parties such as search engine operators and marketing companies on our behalf.

When you first engage with us, you will be given an opportunity to opt out of receiving marketing. In addition, and if at any time you wish to unsubscribe from marketing then you may do so by following the unsubscribe instructions that appear in all marketing communications. Otherwise in respect of marketing from us you can always contact us using the details set out in your policy documentation to update your contact preferences or details. Although this will stop marketing communications we will of course continue to send you service related (non-marketing) communications where necessary.

Please note that there is no personal information used in our online ad campaigns so you will need to check your browser or social media settings to avoid seeing these.

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) will mean we are unable to continue providing you with cover under the policy and may therefore result in the cancellation of the policy. You will therefore lose the right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled. For some policies no refunds will be payable on cancellation, for other products a refund may be payable.

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.

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: 25th September 2019

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

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.