

# Uinsure Privacy Policy

As an insurance product provider, we will need to collect personal information about you, and possibly your family, to arrange and administer your policy, and to handle any claims that you may make.

Your right to privacy is important to us and we are committed to keeping it protected. This Privacy Notice will explain how we use the personal information we collect about you and how you can exercise your data protection rights.

This Privacy Notice will help you understand the following:

## How do we collect your personal information?

There are a number of ways in which we may collect your personal information. If you have received a quote or purchased this policy from a financial adviser, your financial adviser will have provided us with your personal information on your behalf. We may also collect personal information directly from you:

- via enquiry, registration and claim forms;
- via feedback forms and forums;
- when you purchase any of our products or services;
- when you fill out a survey, or vote in a poll on our website;
- through quotes and application forms;
- via our telephone calls with you, which may be recorded;
- when you provide your details to us either online or offline;
- through our use of cookies. You can find out more about this in our cookies policy which can be found [here](#).
- We may also collect your personal information from:
  - publicly 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;
  - credit reference agencies; and
  - any other policyholders or anybody authorised by you to provide us with your personal information.

## What personal information do we collect?

The information we collect will depend on the type of insurance policy that you wish to receive a quote for and whether or not you purchase the policy. Below are the types of information that we would typically collect from you:

- contact details such as your name, email address, postal address and telephone number;
- details of any other persons included on your policy;
- identification information such as your date of birth;
- financial information such as bank details, credit card details and information obtained as a result of any credit checks that we may undertake;
- information relevant to your insurance policy such as details about your property, previous insurance policies or claims;
- information relevant to your claim or your involvement in the matter giving rise to a claim;
- information about the nature of your business and commercial assets;
- your marketing preferences; and
- any other information that we may ask you or that you provide to us.
- In certain circumstances we may also use information about your health but we will only do this where allowed by law or if you give us your consent.

## How do we use your personal information?

We will use your personal information to:

- assess your application or renewal for an insurance quote;
- submit your application to our panel of insurers to enable them to provide you with a quote;
- verify the information provided;
- confirm your identity;
- assess your financial standing;
- prevent fraud;
- complying with our legal or regulatory obligations;
- improve our products, services, training and security;
- resolve any complaints you may have;
- administer and maintain your policies;
- assist you with claims and enquiries;
- maintain your insurance records; and
- facilitate our quality and compliance monitoring.

## Legal grounds for processing your personal information

Data protection laws require us to meet certain conditions before we are allowed to use your personal information in the manner described in this Privacy Notice. To use your personal information, we will rely on one or more of the following grounds:

- Performance of contract: We need to use your personal information in order to provide you with the policy (which is a contract of insurance between you and us), and perform our obligations under it (such as making payments to you in respect of a claim made under the policy);
- Consent: In certain circumstances, we may need your consent unless authorised by law in order to use personal information about you which is classed as "special categories of personal data";
- Necessity to establish, exercise or defend legal claim: If you, or we, bring a legal claim against the other, we may use your information in either establishing our position, or defending ourselves in relation to that legal claim;
- Compliance with a legal obligation: Where laws or regulations may require us to use your personal information in certain ways; and
- Legitimate Interests: We will also process your personal information where this processing is in our legitimate interests. For example, it is in our legitimate interests to ensure that you are kept up to date with changes to our systems and the products that you offer to your customers.
- We will always act reasonably and give full and proper consideration to your interests when relying upon our legitimate interests when processing your data and you will always be given a choice over the use of your data for marketing purposes, which includes the ability to opt-out of certain types of communication.

## Automated decision making

Before we can offer you an insurance product or service, we may need to conduct the following activities, which involve automated (computer based) decision-making:

- Pricing and underwriting – this process calculates the insurance risks based on the information that you have supplied. This will be used to calculate the premium you will have to pay;
- Credit Referencing – using the information given, calculations are performed to evaluate your credit rating. This rating will help us to evaluate your ability to pay for the quoted products and services; and
- Automated Claims – some small claims may qualify for automated processing, which will check the information you provide, resulting in a settlement or rejection of your claim.
- The results of these automated decision-making processes may limit the products and services we can offer you. If you do not agree with the result, you have the right to request that we perform a manual reassessment using the same information that you originally provided.

## Who may we share your personal information with?

We may share your personal information with:

- your relatives or, guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with you such as your financial adviser or your lawyer;
- other insurers, business partners, agents or carefully selected third parties providing a service to us or on our behalf, such as processing our mail, communicating with customers on our behalf, providing IT systems and administrative services, claims handling services and the development and improvement of our internal systems;
- credit reference agencies which we may use to check your credit history. Any checks completed by us when calculating a quotation are only visible to you (if you request a copy of your credit file at the credit reference agencies) and are not visible to other organisations. This type of credit reference check will not affect your credit file;
- premium finance companies should you choose to spread the cost of your policy into monthly instalments. Premium finance companies may use a credit reference agency to check your credit history and assess your application for credit. These searches will be visible to other organisations and could affect your credit file. Premium finance companies may also report the payment history of your account with them to credit reference agencies;
- 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, for example 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;
- third parties we use to recover money you may owe us or to whom we may sell your debt;
- another company, if our business or part of it is bought or taken over by that company to make sure 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 companies or brands within the Uinsure group, for example, where we are unable to provide you with an insurance product we will check whether they have an insurance product, which may suit your needs;
- other companies when we are trailing their products and services which we consider may improve our services to you or our business processes; or
- 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.
- Sometimes your personal information may be sent to other parties outside of the European Economic Area (EEA) in connection with the purposes set out above. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this Privacy Notice, and in doing so may rely on certain "transfer mechanisms" such as the EUUs Privacy Shield, and the standard contractual clauses approved by the European Commission. If you would like further information please contact us.

- Under this Privacy Notice we may be required to transfer all of your data to another provider when requested by Virgin Money unless you inform us otherwise. You will be given 30 days' notice and details of where your data will be transferred and how you can opt out if you wish.

## How long will we keep your information?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with our legal and regulatory obligations. The time period we retain your personal information for will differ depending on the nature of the personal information and what we do with it. How long we keep personal information is primarily determined by our legal and regulatory obligations. We typically keep quote information for 3 years, and policy and claims records for up to 7 years from the end of our relationship each policyholder. As such, we will retain your personal information for up to 7 years after the last policy that you sold cancels. In some cases, such as if there is a dispute or a legal action we may be required to keep personal information for longer.

## Your rights

You have a number of rights concerning the personal information we use. You may request that we:

- provide you with details of the personal information we hold about you. All requests are free of charge, although for requests for the provision of personal information we hold about you we reserve the right to charge a reasonable administrative fee where, we believe an excessive number of requests are being made. Wherever possible, we will respond within one month from receipt of the request, but if we do not, we will notify you of anticipated timelines ahead of the one month deadline. Your personal information can be provided in a structured, commonly used, machine readable form when asked;
- correct inaccurate or incomplete personal information held about you;
- erase your personal information where you believe it is no longer required;
- restrict the processing of your personal information. You have the right to ask that suppress processing your personal information. We will continue to store your personal information but will no longer process it;
- stop your personal information from being used for profiling, direct marketing or research purpose;
- You have rights in relation to automated decision making and profiling, to reduce the risk that a potentially damaging decision is taken without human intervention; and
- perform a manual reassessment using the same information that you originally provided if we have used automated decision making and profiling and this is likely to be potentially damaging.
- Please note, 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, we will let you know our reasons. To make a request, please write to us at Uinsure Limited, PO Box 5524, Manchester, M61 0QR. To ensure that we do not disclose your personal information to someone who is not entitled to it, when you are making the request we may ask you to provide us with your name, address, date of birth, policy number(s) and a copy of your photo identification.

## Further information

If you require further information on, or wish to complain about, the way that we use your personal information, please write to us at Uinsure Limited, PO Box 5524, Manchester, M61 0QR.

If you believe we have not complied with our obligations in relation to the handling of your personal information you have a right to submit a complaint to the Information Commissioner. For further information please visit <https://ico.org.uk/global/contact-us/>