

## WHO WE ARE

Collingwood Insurance Services (UK) Limited (CISL) is authorised and regulated by the Financial Conduct Authority (FCA), registration No. 310870, and are registered in England & Wales, registration No. 4174235. CISLs registered address is *Collingwood Insurance Services (UK) Ltd, Collingwood House, Redburn Court, Earl Grey Way, North Shields, NE29 6AR.*

## LEGAL BASIS FOR PROCESSING

In order to provide our services we will collect and use personal data about you and anyone you provide personal data for. The legal foundation for processing this data is obtained on a contract basis, is for the performance of an insurance contract between you and your insurer.

We also collect other data from you to enable us as your insurance intermediary to provide our services; these include your mobile telephone number, email address, third party authority details, payment information including debit/credit card details and/or bank account number and sort code.

We have a legitimate interest to collect this information from you in order to provide our services including administer your online account.

If you download the Collingwood Roadhow app to assist you pass your theory test or practical driving test and assist you to become a better, safer driver, we may receive information from Roadhow to let us know that you have downloaded the app and are using the DVSA approved courses. We will use this information for fraud prevention to ensure only authorised CISL policyholders have access to the free Collingwood version of the app. We may also use this information to send non-personalised marketing via the Roadhow app, and if you have opted into Marketing we may send personalised offers via your Collingwood online account.

If you request a quote from us, we may share your information with carefully selected insurers to enable them to better forecast their future liability and to price their insurance products to you more accurately and competitively.

Please read the Roadhow Terms and Conditions and Privacy Policy to find out what personal data they collect about you, how they use it and your rights

## CONSENT

CISL are committed to protecting Your privacy and developing technology that gives You the most powerful and safe online experience. This privacy policy applies to all CISL websites and governs Our data collection and usage. By using the CISL websites, and acknowledging consent criteria during Your online or telephony journey You consent to the data practices described in this statement. When We require specific personal data from Yourself We will make it clear at that point what the data is We require, what the purpose is for collection and how CISL will use it.

## WITHDRAWING CONSENT

If after You give consent for CISL to process Your personal data and You change Your mind, under Data Protection legislation You have the right to withdraw Your consent at any point. To do this You will need to send an email to CISL on [compliance@collingwood.co.uk](mailto:compliance@collingwood.co.uk). This correspondence must be addressed to the Head of Risk and Compliance whose role comprises that of the Data Protection Officer.

If You chose to withdraw Your consent for Us to process Your personal data it will result in Us being unable to administer Your policy.

You have the right to withdraw Your consent to process information such as mobile telephone number, email address, Third Party Authority, bank details and any other additional information You provide Us, however, this may result in Us being unable to administer Your policy.

## WHY WE COLLECT YOUR PERSONAL INFORMATION

CISL will collect personal information from You, the customer, in order to provide products and services that meet Your needs. This will be in the form of providing an insurance quote, and if agreed upon, an insurance policy along with administering any insurance policy. In addition, personal data may be collected by CISL for the purpose of claims management.

## HOW WE WILL COLLECT YOUR PERSONAL INFORMATION

Your personal information will be collected by one of the following methods; online via the CISL suite of websites, by post, email, text or multimedia message, over the telephone or face to face. Your personal information will be collected once You start Your CISL insurance quote. We will collect it by asking You a series of questions, related to the products and services We are offering or providing. We require the answers to these questions to be factually correct and accurate.

## WHO WE WILL COLLECT PERSONAL INFORMATION FROM

We will only collect personal information from customers who proceed to make a quote or to take out a policy, this includes the Policy Holder, a named driver or any Third Party Authority who is to be named on the policy.

## WHAT PERSONAL INFORMATION WE COLLECT

CISL will collect the personally identifiable information from Yourself listed below;

- You full name;

- Your date of birth;
- You address;
- You home, work and/or mobile telephone number;
- Your email address;
- Your driving licence number;
- Driving Convictions; and
- Criminal Convictions.

### INFORMATION SHARING

CISL may share or receive Your personal information with/from carefully selected partners to support the processing and administration of your policy. We may also share or receive Your personal data with/from selected partners to provide a range of services, products and benefits to Your policy. In addition, CISL may share data with partners to help it perform statistical analysis, or provide customer support. All such partners are required to maintain the confidentiality of Your information. These partners are detailed below;

- AA (Automobile Association) for breakdown assistance;
- Aggregators (online price comparison sites);
- Carrot Insurance from Zurich for Insurance cover;
- Close Brothers for arranging credit to be repaid by direct debit;
- Collingwood Insurance Company Limited (CICL) for Insurance Cover;
- Coplus for insurance policy add-ons;
- Click4Assistance who provide our Live Chat facilities;
- Hamilton Internet Services Limited T/A My Car Needs A for processing MOT reminders on our behalf
- Infinity Tracking Limited for online statistical purposes.

- Motor Insurance Database (MID) and Motor Insurance Bureau (MIB) to confirm whether you have an insurance policy with CISL and to validate Your No Claims Bonus;
- MyLicence for validating Your Driving Licence type and any conviction data;
- Roadhow app for DVSA approved courses to assist you pass your theory and practical driving test and become a better/safer driver
- RS Fleet Installation Limited provide and fit telematics 'black boxes'; and
- Trak Global Group provide driving information that is collected via the telematics box.

### SECURITY OF YOUR PERSONAL INFORMATION

CISL secures the personally identifiable information You provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. When personal information (such as a credit card number) is transmitted to other web sites, it is protected through the use of encryption, such as Secure Sockets Layer (SSL) protocol.

### YOUR RIGHTS

You have the following rights as an individual which You can exercise in relation to the personal information We hold about You;

- The right to be informed of what We use Your personal data for;
- The right for You to request copies of personal data held about You<sup>1</sup>;
- The right for Us to rectify any errors identified with Your personal data;

- The right to have Your data deleted or removed<sup>2</sup>;
- The right to block or restrict Our processing of Your personal data;
- The right to data portability to move, copy or transfer personal data from one IT environment to another in a safe and secure way;
- The right to object to Us processing Your personal data or for direct marketing; and
- The right to lodge a complaint with CISL if You feel We are not handling Your personal data appropriately<sup>3</sup>.

Further information regarding Your rights can be found at; <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### INFORMATION RETENTION

CISL have a regulatory obligation to retain customer information for a period of seven years. This is to ensure We are able to service Your policy for its lifecycle and to support on the resolution of any claims that may occur during, or after, the policies duration. CISL retain personal data via computer secure servers and paper documentation storage.

If you obtain a quote from us but do not buy the policy, your personal details for that quote will only be held for 12 months.

### RECORDING TELEPHONE CALLS

We act in our legitimate interests as call recordings help us to meet our regulatory requirements to retain evidence of transactions, combat financial crime, provide the best level of customer service and to assist with complaints.

<sup>1</sup> Via a Data Subject Access Request

<sup>2</sup> Can only be performed in certain circumstances

<sup>3</sup> CISLs internal complaints procedure is detailed within Your policy Terms of Business Agreement.

## VISITORS TO OUR WEBSITES

When You visit a CISL website a third party service is used, Google Analytics<sup>4</sup>, to collect standard internet log information and details of visitor behaviour patterns. CISL do this to keep track of the web sites and pages Our customers visit within CISL, in order to determine which services are the most popular. This data is used to deliver customised content and advertising within CISL to customers whose behaviour indicates that they are interested in a particular subject area. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting Our website. If We do want to collect personally identifiable information through Our website, We will be up front about this. We will make it clear when We collect personal information and will explain what We intend to do with it.

## USE OF COOKIES

Cookies are small files stored on a computer's hard drive and are generally harmless. CISL do not track or collect any personally identifiable information of site visitors. We will not match any data gathered from Our site with any personally identifying information from any other source. We will not associate Your IP address with any other data held by any third party. We will link any IP addresses with the identity of a computer user. These cookies are;

| Cookie Name         | Cookie Policy                                                                                                             |
|---------------------|---------------------------------------------------------------------------------------------------------------------------|
| AdWords Retargeting | When You are browsing other websites We use these third party cookies to let us deliver personalised adverts to You, e.g. |

<sup>4</sup> Google Analytics utilise \_utma, \_utmb, \_utmc and \_utmz cookies for this purpose.

DoubleClick Retargeting

reminding you to return to complete Your quote.

You can control advert personalisation on Google and partner websites here: <https://adssettings.google.com/>

When You are browsing other websites We use these third party cookies to let Us deliver personalised adverts to You, e.g. reminding You to return to complete Your quote.

You can control advert personalisation on Google and partner websites here: <https://adssettings.google.com/>

When you are browsing social media sites such as Facebook, Twitter and You tube, We use these third party cookies to let Us deliver personalised adverts to You, e.g. reminding You to return to complete Your quote.

Social Media Retargeting

You can control advert personalisation from within the social media sites settings. For example <https://en-gb.facebook.com/ads/settings>

If You prefer that We do not collect data by using Cookies, You can disable this function via the [Collingwod.co.uk](http://Collingwod.co.uk) website or within Your browser

<sup>5</sup> Transport Layer Security.

settings and if You want to remove Cookies that are installed on Your computer, You should refer to the instructions for Your browser and/or operating system to locate the file or directory that stores cookies.

## PEOPLE WHO USE OUR LIVE CHAT SERVICE

CISL use third party providers, Click4Assistance and Drfit.com, to supply and support Our Live Chat services, which We use to handle customer enquiries in real time. If You use the Live Chat service We will collect Your name, email address, Policy Reference (optional) and the contents of Your Live Chat session. This information will be retained for a minimum of seven years and will not be shared with any other organisations, with the exception of the Live Chat suppliers. You can request a transcript of Your Live Chat session by contacting CISL on [webmaster@collingwood.co.uk](mailto:webmaster@collingwood.co.uk). This correspondence must be addressed to the Head of Risk and Compliance.

For further information regarding the privacy policy relating to Live Chat, please visit <http://www.click4assistance.co.uk/privacypolicy.aspx> and <https://www.drift.com/privacy-policy/>

## EMAILING US

We will monitor any emails sent to Us, including file attachments, for viruses or malicious software. Please be aware that You have a responsibility to ensure that any email You send is within the bounds of the law. If Your email service does not support a form of encryption, for example it does not support TLS<sup>5</sup>, You should be aware that any emails We send or receive may not be protected in transit.

## **SOCIAL MEDIA**

CISL's Social Media<sup>6</sup> account is managed internally. If You send a private or direct message via social media the message will be stored for seven years. Your messages will not be shared with any other third party.

Please keep in mind that if You directly disclose personally identifiable information or personally sensitive data through CISL public message boards, this information may be collected and used by others<sup>7</sup>.

For further information regarding the security of Your data within Social Media platforms please review their associated privacy policies.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

CISL will disclose Your personal information, without policy, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on CISL or its sites; (b) protect and defend the rights or property of CISL; and, (c) act under exigent circumstances to protect the personal safety of users of CISL, or the public.

## **LINKS TO OTHER WEBSITES**

This privacy policy does not cover the links within this site linking to other websites. We encourage You to read the privacy statements on any other website You may visit.

## **CHANGES TO THIS PRIVACY POLICY**

CISL will occasionally update this privacy policy to reflect company and customer feedback. CISL encourages You to periodically review this privacy policy to be informed of how it is protecting Your information.

It will be reviewed on an annual basis as a minimum, however it may be reviewed more often due to changes in regulation and feedback received. The last review and update was in April 2019.

## **CONTACTING CISL**

If You have queries surrounding this privacy policy, concerns or questions regarding the use of Your data or Our adherence to this privacy policy, please contact CISL on [compliance@collingwood.co.uk](mailto:compliance@collingwood.co.uk). This correspondence must be addressed to the Head of Risk and Compliance.

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<sup>6</sup> Facebook, Twitter and Instagram.

<sup>7</sup> CISL does not read any of Your private online communications.