Collingwood

Your Privacy Matters

We're committed to protecting your personal information

We understand that your personal information is important to you and it's important to us too.
Whether you're getting a quote, buying insurance, making a claim or contacting us for help, we'll always use your information responsibly, keep it secure and explain what we are doing clearly.

This document explains how and why we use your personal information

Our promise to you

- ✓ Explain things in plain English
- ✓ Only ask for information we need
- ✓ Be open about how we use it
- ✓ Protect your information and respect your rights

This privacy notice explains:

What we collect
Information such as your contact details, policy information and claims history.

Why we use it
To provide insurance services, verify information and support our customers.

Who we share it with
Insurers, service providers, fraud prevention organisations and trusted partners.

Your rights
You can access, correct or object to how we use your information in certain circumstances.

How we protect it
We use security measures to help keep your information safe and secure.

Introduction & Who we are

This privacy notice explains how Collingwood Insurance Services (UK) Limited ("CISL") and Collingwood Business Solutions Limited ("CBSL"), ("Collingwood", "we", "us" or "our") collects, uses and protects your personal information.

CISL are an insurance intermediary authorised and regulated by the Financial Conduct Authority (FCA). Our firm reference number is **310870**.

CISL is registered with the Information Commissioner's Office (ICO) under registration number **Z7099126**. CBSL is registered with the Information Commissioner's Office (ICO) under registration number **Z5260160**

This notice explains how and why we use your personal information when you ask for a quote, buy or manage an insurance policy, make or discuss a claim, use our website, or use any service provided by Collingwood.

Please read this notice carefully as it explains how we and/or carefully selected third parties we work with, collect and use your personal information. For information about what cookies are and how we use them, please read our Cookie Notice.

Understanding Personal Data

Personal data is information about you that identifies you or could be used to identify you. We need some personal data to provide insurance services, support our customers, help prevent fraud and meet our legal and regulatory obligations.

Everyone's personal data is different, depending on the products and services they use.

Your data rights

You have the right to:

Be Informed To be clear about how and why we use your information	**Access your Information** To ask what personal information we hold about you	**Correct your information** To ask us to fix anything that is wrong or out of date
Erase your information To ask us to delete your information in certain situations[1].	**Restrict how we use it** To ask us to limit how we use your information in certain situations	**Move your information** To ask for your information in a format you can reuse or share with another company
Object To object to how we use your information if we rely on a "legitimate interest"	**Automated Decision Making** To ask about any automated decisions we make about you and to request human review where the law allows.	**Raise a Concern** To tell us if you are unhappy with how we have handled your information so we can investigate and help.

Accessing your personal data

If you would like a copy of the personal information we hold about you (a Subject Access Request), please contact our Data Protection Officer using the details at the end of this notice.

We will usually respond within one month and may need to verify your identity before responding.

We will provide the personal information we hold about you, although this does not always include every document, email or record where it appears.

[1] This right does not always apply where we are required to keep information for legal, regulatory or fraud prevention purposes

Who uses your information

When you ask for a quote, buy a policy or contact us, more than one company may use your information. Each company has a different job.

Collingwood Insurance Services (UK) Limited (CISL)

The company that arranges and manages your insurance

We act as an insurance intermediary (broker) and service provider.
We use your information to:

Give you a quote	Set up your policy	Make changes to your policy	Take payments and give refunds	Answer your questions	Meet our legal and regulatory responsibilities

Collingwood Business Solutions Limited (CBSL)

The company that supports us

CBSL owns CISL and helps us provide our services.

It may help with:

- Technology and computer systems
- Finance and payment support
- Data and reporting services
- Administrative support
- Claims support services

CBSL will usually use your information for CISL or the insurer.

Collingwood Insurance Company Limited (CICL)

The Insurer

CICL is the insurer shown on your policy, it may use your information to:

- Decide whether it can insure you
- Work out the price
- Set the policy terms
- Manage claims
- Prevent and detect fraud
- Meet its legal and regulatory responsibilities

You can find out more about how CICL use your data in their privacy notice.

CISL helps arrange and manage your insurance, CICL provide your insurance, and CBSL supports both companies by providing business support and claims services.

What information do we collect?

We collect information to give you a quote and provide your insurance.

The information we need will depend on the product you choose and how you use our services.

About You	▪ Title ▪ Name ▪ Date of Birth ▪ Address ▪ Phone number ▪ Email address
Driving & Vehicle Details	▪ Driving licence details & driving history ▪ Claims & convictions ▪ Vehicle details ▪ How the vehicle is used ▪ Details of other drivers
Your Policy	▪ Quotes ▪ Policies details & cover selected ▪ Changes made to the policy ▪ Renewal and cancellation records ▪ Documents linked to the policy
Payment Information	▪ Payment method ▪ Transaction details ▪ Premium finance information
When you contact us	▪ Call recordings ▪ Emails, letters & live chat ▪ Complaints ▪ Notes made by our teams ▪ Information about any support you need
Claims & Checks	▪ Accident & claim Details ▪ Photos & evidence ▪ Medical information linked to a claim ▪ Reports from insurers, solicitors or claim partners ▪ Identity check results ▪ Fraud prevention information.

Who we collect information from

We collect personal information from different places, depending on the product or service you use.

This may include information from:

- you, when you ask for a quote, buy a policy, make changes, contact us or make a complaint;
- policyholders, named drivers, nominated people or anyone authorised to act on your behalf;
- price comparison websites, introducers, brokers or other business partners who send your details to us;
- insurers, including the insurer shown on your policy;
- claims handlers, repairers, engineers, solicitors, medical experts and other people involved in a claim, including information received from Winn Solicitors where they are supporting claim handling services;
- credit reference agencies, identity checking providers and fraud prevention organisations;
- Creditsafe and TransUnion, where we need to complete credit, affordability, identity or fraud checks;
- the DVLA, where you have given permission for us to check driving licence information;
- finance providers, payment providers and banks;
- regulators, law enforcement agencies, government bodies or public authorities where required or allowed by law;
- public records and publicly available sources, where it is lawful and relevant to use them; and
- our websites, online forms, call recordings, emails, live chat, social media messages and other contact you have with us.

If you give us information about another person, for example a named driver or you nominate someone to help you manage your policy, you must tell them about this privacy notice and make sure they are happy for you to share their information with us.

Special Category Information

Some information is more sensitive and needs extra protection. This can include information about your health or disability.

We do not routinely ask for special category information. However, we may collect or receive it if we need it to:

- Provide support to you,
- understand your needs,
- manage your policy,
- deal with a claim
- handle a complaint
- prevent harm; or
- meet our legal and regulatory obligations.

Where you tell us about a vulnerability, health condition, disability or support need, we may record relevant information so we can understand your circumstances. We will only use health or disability information when the law allows us to.

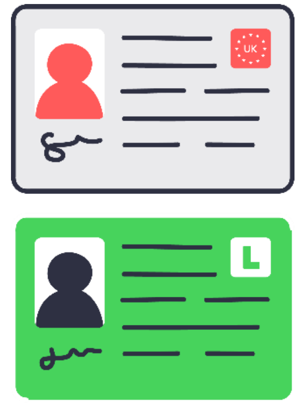
We may use it to give you the right support, meet our legal duties or help protect someone from serious harm. We will only record information that we need and take extra steps to keep it safe.

Criminal Convictions and Offences

We may collect information about criminal convictions, offences, endorsements and driving disqualifications where this is necessary to arrange, administer or renew an insurance policy, assess risk, prevent fraud, investigate claims, or meet legal and regulatory requirements.

We will only use this information when the law allows us to. We will only use what we need and will take extra steps to keep it safe.

Driving licence checks with the DVLA



Where you have given us permission, we may check driving licence information with the Driver and Vehicle Licensing Agency (DVLA).

We may do this for you, or for any driver covered by the policy, if we hold their details and have permission to carry out the check

We use this information to help us:

- confirm driving licence details;
- check licence status and entitlement
- check relevant restrictions;
- check endorsements, convictions or disqualifications;
- assess insurance risk
- provide a quote;
- manage your policy
- make changes to your policy;
- deal with renewal; and
- help prevent fraud or incorrect information being used.

We may carry out DVLA checks before you buy a policy and, if you buy a policy, during the life of the policy. This may include when you make a change or when your policy is due for renewal.

A DVLA check should not leave a visible footprint on your driving licence record.

If we cannot confirm the information we need, this may affect whether we can offer, continue or renew your insurance.

Credit reference and affordability checks

To help us assess applications, prevent fraud and meet our legal and regulatory responsibilities, we may obtain information about you from credit reference agencies.

We may obtain this information through Creditsafe. Creditsafe uses its data partner, TransUnion, to provide consumer credit and identity information.

The information we receive may include:

- information used to confirm your identity;
- credit commitments;
- payment history;
- public record information; and
- information used to support creditworthiness, affordability, identity and fraud checks.

We use this information only where we have a lawful reason to do so. This may include assessing an application, checking affordability, verifying identity, preventing fraud, managing risk, or meeting legal and regulatory requirements.

Creditsafe Business Solutions Limited is authorised and regulated by the Financial Conduct Authority. Its FCA Firm Reference Number is 742313.

TransUnion International UK Limited is authorised and regulated by the Financial Conduct Authority. Its FCA Firm Reference Number is 805757.

You can find out more about how Creditsafe and TransUnion use personal information in their own privacy notices.

Automated systems & Artificial Intelligence (AI) decision support and profiling

We may use automated systems, including artificial intelligence (AI), to help us provide our services. These tools may support activities such as risk assessment, fraud prevention, identity checks, affordability checks, record management and customer support.

We may also use automated systems to assess insurance risks and support underwriting decisions. This may include determining whether a quote can be offered, the level of risk presented, and the premium that may apply.

These tools may use personal information to produce indicators, scores, recommendations or risk assessments. This helps us work more efficiently and apply checks consistently.

Automated systems are used as part of our decision-making process, but where required we will ensure appropriate human oversight and review.

You can contact us if you would like more information about how we use automated systems or if you wish to discuss or challenge a decision.

Technology supports our decisions.
People make the difference.

Why do we use your information?

We don't just want you to know what personal data we collect, we think it's important that you understand why we collect it too.

We must have a legal basis (lawful reason) for using your personal information under Data protection laws.

Consent	Contract	Legal Obligation	Vital Interest	Public Task	Legitimate Interests

You can find out more about lawful bases on the ICO’s website.

We use your personal information to provide our insurance services and support you throughout your insurance journey. We will only use your information when we have a lawful reason to do so.

Depending on the product or service you use, we may use your information to:

- provide a quote;
- arrange and manage your insurance policy;
- make changes to your policy;
- process payments and refunds;
- renew or cancel your policy;
- verify your identity and driving licence information;
- carry out credit, affordability and fraud prevention checks;
- investigate and manage claims;
- provide support if you need extra help;
- respond to questions, complaints or feedback;
- improve our products, services and customer experience; and
- meet our legal, regulatory and security obligations.

The lawful reasons we use your information:

What we use your information for	Lawful reason
Providing a quote	Contract
Arranging and managing your policy	Contract
Processing payments and refunds	Contract
Managing renewals and policy changes	Contract
Handling claims	Contract and Legal Obligation
Checking driving licence information with the DVLA	Contract and Legitimate Interests
Carrying out credit, affordability and identity checks	Legitimate Interests and Legal Obligation
Preventing and detecting fraud	Legitimate Interests and Legal Obligation
Supporting vulnerable customers	Legal Obligation and Legitimate Interests
Responding to complaints and customer enquiries	Contract, Legal Obligation and Legitimate Interests
Improving products and services	Legitimate Interests
Sending information about our own similar products and services to existing customers (where permitted under PECR soft opt-in rules)	Legitimate Interests
Sending marketing communications where consent is required	Consent
Sharing your information with selected partners so they can contact you about their products or services, where you have agreed to this	Consent
Meeting regulatory and legal requirements	Legal Obligation

We do not sell your personal information.

We only use your information to provide our services, support our customers, prevent fraud, meet our legal and regulatory obligations, and where permitted, tell you about products and services that may be relevant to you.

Who we share your information with

We may share your personal information with other organisations where we need to do so to provide our services, manage your policy, handle claims, prevent fraud, meet legal or regulatory requirements, or where you have agreed to us sharing it.

This may include:

- Collingwood Business Solutions Limited (CBSL), which provides business support services;
- Collingwood Insurance Company Limited (CICL), the insurer for certain products;
- Creditsafe and TransUnion for credit, affordability, identity and fraud prevention checks;
- the DVLA, where driving licence checks are required;
- insurers, reinsurers and underwriting partners;
- claims handlers, solicitors, repairers, engineers, medical experts and other claims service providers, including Winn Solicitors who support certain claims and out-of-hours First Notification of Loss (FNOL) services;
- fraud prevention, identity verification and crime prevention organisations, such as the Claims and Underwriting Exchange (CUE), the Insurance Fraud Bureau (IFB) and other organisations involved in the prevention and detection of fraud and financial crime;
- payment service providers, premium finance providers and banks;
- technology suppliers, cloud hosting providers and other service providers who help us operate our business;
- regulators, ombudsmen, law enforcement agencies and government bodies; and
- selected marketing partners where you have consented to your information being shared for marketing purposes.

We only share the information that is needed for the purpose concerned. Where a supplier processes information for us, they must follow our instructions and protect the information they handle.

Where we store or send your information

We mainly use and store personal information in the United Kingdom (UK).

Sometimes, we may need to share personal information with organisations located outside the UK or the European Economic Area (EEA). This may include insurers, reinsurers, claims suppliers, fraud prevention agencies, technology providers, cloud service providers, data suppliers, and other organisations that help us provide our products and services.

Where personal information is transferred outside the UK or EEA, we will make sure that appropriate safeguards are in place to protect it. These safeguards may include:

- International Data Transfer Agreements (IDTAs);
- the UK Addendum to Standard Contractual Clauses (SCCs);
- approved contractual clauses issued by the UK Government or relevant supervisory authorities; or
- transfers to countries that have been recognised by the UK Government as providing an adequate level of protection for personal information.

We will only transfer the personal information that is necessary for the purpose concerned and will take appropriate technical and organisational measures to keep it secure.

If you would like more information about international transfers of your personal information or the safeguards we use, please contact us using the details in this privacy notice.

Marketing

We may use your personal information to tell you about products and services that may be relevant to you.

If you are an existing customer, we may contact you about our own similar products and services where permitted by the Privacy and Electronic Communications Regulations (PECR). We do this because we have a legitimate business interest in promoting products and services that may be relevant to our customers.

You will always have the opportunity to opt out of receiving these communications when we collect your information and in every marketing message we send.

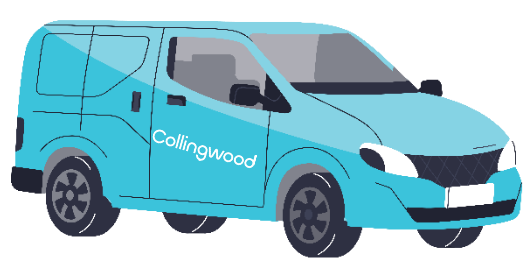
Where PECR requires us to obtain your consent before sending marketing communications, we will only do so where you have agreed to receive them. You can withdraw your consent at any time.

Where you have specifically agreed, we may share your personal information with carefully selected partners so they can contact you about their products and services. This could include partners offering products or services that may be relevant to your insurance needs. We will only share your information for these purposes where you have given your consent, and you can withdraw that consent at any time.

You can opt out of marketing communications or withdraw your consent at any time by:

- clicking the unsubscribe link in our emails;
- following the instructions in a text message;
- contacting us using the details in this privacy notice.

Withdrawing your consent will not affect the lawfulness of any processing carried out before your consent was withdrawn.



How Long We Keep Your Information

We will only keep your personal information for as long as we need it.

How long we keep information depends on the type of information, the product or service you use, and the reason we collected it.

We may need to keep records to manage your policy, deal with claims and complaints, prevent fraud, meet legal and regulatory requirements, and protect our legal rights.

Some common examples are shown below:

Record Type	What it includes	Retention Period
Quote Records	Information provided when requesting a quote	**6 months**
MyLicence Checks	Driving licence information obtained through the MyLicence service	**29 days**
Policy Records & Documents	Policy applications, policy documents, endorsements and policy correspondence	**7 years**
Standard Claims	Claim records, evidence and claim correspondence	**7 years from the date the claim is closed**
High Value Claims	Complex or high-value claims that may have a longer legal lifespan	**15 years from the date the claim is closed**
Claims Involving Children	Claims where the claimant is under 18 years old	**7 years after the claimant reaches age 21**
Call Recordings & Live Chat	Telephone calls & online chat conversations and related records	**2 years**
Physical Post	Incoming post and supporting documents that have been scanned into our systems	**Scanned then retained for 6 months**

Even if you ask us to delete your information, there may be times when we cannot do so immediately. For example, we may need to retain information to:

- comply with legal or regulatory requirements;
- deal with claims, complaints or disputes;
- prevent and detect fraud or financial crime; or
- establish, exercise or defend legal claims.

When we no longer need your information, we will securely delete it, anonymise it, or dispose of it in line with our retention policy.

Cookies and Similar Technologies

We use cookies and similar technologies on our websites to help them work properly, keep them secure, understand how they are used and improve your experience.

Some cookies are necessary for our websites to operate. Other cookies help us analyse website performance, understand customer journeys and, where you agree, provide personalised content and marketing.

When you visit our website, we may collect information about how you use it, including technical information about your device, browser and pages visited.

Where your consent is required, you can choose which optional cookies you would like to accept when you visit our website. You can change your preferences at any time using the **Change Cookie Preferences** link on our website.

For more information about the cookies we use and how to manage them, please see our Cookie Notice.

Consent and Withdrawing Consent

Where we rely on your consent to process personal information, you can withdraw your consent at any time.

This may include consent for:

- marketing communications;
- sharing your information with selected partners for marketing purposes; and
- optional cookies and similar technologies.

Withdrawing your consent will not affect the lawfulness of any processing carried out before your consent was withdrawn.

You can withdraw your consent by contacting us, using the unsubscribe option in our marketing communications, or updating your cookie preferences on our website

Keeping Your Information Secure

We take the security of your personal information seriously. We use technical, organisational and physical security measures designed to protect information from unauthorised access, loss, misuse, alteration or disclosure.

Access to personal information is limited to those who need it for legitimate business purposes. We regularly review and update our security measures to help keep your information safe.

Contacting us about your personal information

If you have any questions about this privacy notice, want to exercise your data protection rights, or have concerns about how we use your personal information, please contact our Data Protection Officer (DPO) by emailing compliance@collingwood.co.uk. We may contact you to clarify or discuss your request if we need more information to help us identify what you are asking for and respond appropriately.

You can also

- **write** to us using the address below;
- **contact** our Customer Service Team by phone or email;
- use the **live chat** service on our website; **or**
- **contact us through any of our usual customer contact channels.**

We may need to verify your identity before responding to your request. This helps us keep your information secure.

Our Address:

Data Protection Officer
Collingwood Insurance Services (UK) Limited
Collingwood House
Redburn Court
Earl Grey Way
North Shields
NE29 6AR

If you use artificial intelligence (AI) tools to help prepare correspondence or complaints, please ensure the information provided is accurate and reflects your personal circumstances.

Making a Complaint

If you are unhappy with how we have handled your personal information, please contact our Data Protection Officer first and we will do our best to resolve your concerns. If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO), the UK's independent authority for data protection and privacy rights.

You can find more information about making a complaint on the ICO website (www.ico.org.uk).

Links to Other Websites

Our websites and communications may contain links to other organisations' websites. We are not responsible for the content, security or privacy practices of those websites. We recommend that you read their privacy notices before providing personal information.

Changes to This Privacy Notice

We may update this privacy notice from time to time to reflect changes in our services, legal requirements or the way we use personal information.

The latest version will always be available on our website. The "Last Updated" date at the end of each page in this notice shows when it was most recently revised.