

Collingwood Insurance Company Limited Privacy Notice

Collingwood Insurance Company Limited ("CICL", "we", "our", "us") is committed to protecting your privacy. This Notice applies to visitors to our website, prospective policyholders, policyholders, and drivers covered by a CICL policy purchased from an insurance intermediary, as well as the subsequent administration of such policies (including insurance claims that arise thereafter). It sets out how we collect and use personal information.

Changes to this Notice

CICL will occasionally update this Notice to reflect company and customer feedback. CICL encourages you to periodically review this Notice to be informed of how it is protecting your information. This statement was last updated on 26/06/2023.

Data Protection

We are governed by the Data Protection Regulation applicable in both the United Kingdom and Gibraltar. Under this legislation we are required to tell you the following information. It explains how we may use your information and tells you about the systems we have in place that allow us to, for example, detect and prevent fraudulent applications for insurance policies and claims. The savings that we make help us to keep premiums and products competitive.

In order to provide our services, we will collect and use data about individuals, which means we are a 'data controller'.

If your interaction with us is restricted to visiting this website, you give us consent to collect your personal data. If after you give consent and you change your mind, under Data Protection legislation you have the right to withdraw your consent at any point. To do this, send an email to our Data Protection Officer on enquiries@collingwood.gi addressed to the Data Protection Officer.

In the event you obtain quotations and subsequently purchase cover from your insurance intermediary, our legal basis for processing your data is the performance of an insurance contract arranged between you and us. We are registered for the purposes of, and exercise control over, the processing of personal data, for which we carry specific responsibilities.

Why we need your data

Viewing our website only

This enables us to track activity on our website. CICL may collect personally identifiable information, for example but not exclusively e-mail address or name.

Quotations are separately provided, and policies are sold, by third party Insurance Intermediaries therefore you are encouraged to review their privacy notices so you can understand how your information is collected, used and shared. CICL is not responsible for the privacy notices of such firms.

Obtaining insurance quotations and purchasing cover

The personal data we collect will depend on our relationship with you. For example, we will collect and hold more detailed information about you if you become a customer than if you simply receive a quote. Certain types of personal data are considered to be "special categories of data" due to their more sensitive nature. Sometimes we will ask for or obtain special categories of information because it is relevant to your insurance policy or claim.

Where we refer to personal data, as set out in these notices, it is also deemed to include special category data, for example, medical conditions or convictions.

The information that you give us will be used by us and your insurance intermediary and anybody appointed by us or them for the purposes of providing you with a quotation with a view to entering into an insurance contract, administering your insurance policy or a claim. It may be disclosed to reinsurers and to regulatory authorities for the purposes of administering your insurance policy or claim, as well as monitoring compliance with regulatory requirements.

Where this happens, we will ensure that anyone to whom we send your information agrees to treat it with the same level of protection as if we were dealing with it.

If you provide personal data on behalf of or about another person, you confirm that they have given you permission to give the information to us and your insurance intermediary and that we and they may process it.

We and your insurance intermediary may undertake checks against publicly available information (such as DVLA records for MyLicence checks, electoral roll, county court judgements, bankruptcy orders or repossessions). These checks may be made when you take out insurance with us or if you make a claim and the information shared with anyone acting on our behalf to administer your insurance policy or a claim (e.g. loss adjusters or investigators).

Credit Searches

To help us prevent fraud and to check your identity, we and your insurance intermediary may search files made available to us by credit reference agencies, who may keep a record on that search.

How we will use your data

Underwriting Purposes

We will examine the potential risk in relation to your prospective or current policy (including anyone else likely to be involved, for example your age and the age of any other prospective drivers), so we can:

- consider whether to accept the relevant risk;
- make decisions about the provision and administration of insurance policies and related services for you (and members of your household or company depending on your policy type);
- validate your claims history (or the claims history of any person likely to be involved in the insurance policy or claim) at any time, including upon application for insurance, in the event of an accident or a claim, or at a time of renewal.

DVLA

This paragraph applies where you have agreed we may access Driver & Vehicle Licensing Agency 'DVLA' records:

Information will be collected from you to enable us to examine the potential risk in relation to your policy so we can provide your (or that of any person covered by this policy for whom we hold details) Driving Licence Number ("DLN") to the DVLA to confirm your (or that of any person covered by this policy for whom we hold details) licence status, entitlement and relevant restriction information, in addition to endorsement/conviction data. Searches may be carried out prior to you purchasing cover and, in the event you purchase a policy, at any point throughout the duration of your insurance policy including at the mid-term adjustment and renewal stage(s). A search of the DLN with the DVLA should not show a footprint against your (or that of any person covered by this policy for whom we hold details) driving licence. For details relating to personal information held about you by the DVLA, please visit www.dvla.gov.uk.

Motor Insurance Database

Information relating to your insurance policy will be added to the Motor Insurance Database ("MID") managed by the Motor Insurers' Bureau ("MIB"). The 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 or anyone covered by this policy 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. You should show these notices to anyone insured to drive the vehicle covered under this insurance policy.

Claims Management Purposes

In the event of a claim, we may need to disclose personal information with any other party involved in that claim, such as third parties involved in the incident, insurers, solicitors or representatives and medical teams (either relating to third parties or appointed by us), the Police or other investigators. We may also have to investigate your claims and conviction history.

Management Information Purposes

We will analyse insurance and other markets for the purposes of: risk assessment, performance reporting, portfolio assessment and management reporting.

Anti-fraud Purposes

Fraud prevention and detection

In order to prevent and detect fraud we may at any time:

- Share information about you with other organisations and public bodies including the Police; and/or
- Undertake credit searches and additional fraud searches; and/or
- Check and/or file your details with fraud prevention agencies and databases, and if you give us false or inaccurate information and we suspect fraud, we will record this.

We and other organisations may also search these agencies and databases to:

- Help make decisions about the provision and administration of insurance, credit and related services for you and members of your household or company depending on your policy type; and
- Trace debtors or beneficiaries, recover debt, prevent fraud and to manage your accounts or insurance policies; and
- Check your identity to prevent money laundering, unless you furnish us with other satisfactory proof of identity.

We can, on request, supply further details of the databases we access or to which we contribute.

Claims history

Under the conditions of your policy you must tell us about any Insurance related incidents (such as fire, water damage, theft or an accident) whether or not they give rise to a claim. When you tell us about an incident we will pass information relating to it to industry databases.

We may search databases when you apply for insurance, in the event of any incident or claim, or at time of renewal of your insurance policy (if applicable), to validate your claims history or no claims bonus or that of any other person or property likely to be involved in the insurance policy or claim. This includes, but is not limited to:

- Claims and Underwriting Exchange (CUE)
- Motor Insurers Anti-Fraud & Theft Register (MIAFTR)

How your data will be processed

Insurance agencies and industry databases

We may pass information to the Claims and Underwriting Exchange Register (CUE) and the Motor Insurers' Anti-Fraud and Theft Register (MIAFTR), run by the Motor Insurers' Bureau (MIB). The aim is to help us to check information provided by you and also to prevent fraudulent claims. These registers may be searched in considering any application of insurance in connection with the policy. We will pass any information relating to any incident (such as an accident or theft), which may or may not give rise to a claim under this insurance policy and which you have to notify us of in accordance with the terms and conditions of this insurance policy, to the relevant registers.

Other insurers

We may pass information about you and this insurance policy to other insurance companies with whom we reinsure our business or who are dealing with a claim made under this policy. In addition, information may be passed to other insurance related organisations in common with industry practice. Such companies may be located in countries outside the UK and Gibraltar but within the European Economic Area ("EEA").

Information on products and services

Where we have relevant consent, we may use the details you have provided to send you information about our other products and services or to carry out research. We may contact you by letter, telephone or e-mail. Please be reassured that we won't make your personal details available to any companies other than those that are contracted by us to provide services relating to your insurance contract with us. If you would prefer not to receive information from us or those companies who provide services on our behalf, simply tell our service provider when you call or write to them at:

Head of Risk and Compliance
Collingwood Insurance Services (UK) Limited
Collingwood House



Redburn Court
Earl Grey Way
North Shields
Tyne and Wear
NE29 6AR

Your insurance intermediary

In the event that we are unable to continue to trade with your insurance intermediary because they have ceased to trade through bankruptcy or liquidation, or in the event that their relevant FCA authorisation is revoked, we reserve the right to pass your insurance policy and all details on to another intermediary. If you do not wish for this to happen then please put your request in writing to us.

How long we will keep your data

We will keep your personal information for as long as reasonably necessary to fulfil the purposes set out in this notice and to comply with our legal and regulatory obligations. We have a detailed retention policy in place which governs how long we will hold different types of information for. The exact time period will depend on the purpose for which we collect that information, for example:

- Policies: 7 years
- Claims: 7 years
- Complaints: 7 years

In some circumstances depending on the nature of your policy and any claims made under it, data may be retained for a further period. It is retained for as long as a potential claim might be made or whilst a claim is being processed.

Your rights and your personal data

You are entitled to receive a copy of the information we hold about you. A request for personal data is free, unless the request is manifestly unfounded or excessive, in which case a reasonable administration fee may be charged.

We take reasonable steps to ensure that the information we hold about you is accurate and where necessary up to date and complete. You are entitled to ask for any inaccurate personal data held by us to be rectified. You are entitled, in certain circumstances, to request that your personal information held by us is erased (subject to meeting certain criteria). Both of these rights are subject to our legal obligations under the regulations.

You have the right to restrict or object to the processing of your personal data, subject to our legal obligations under the regulations. Please note in some circumstances we will not be able to cease processing your information, for example if you have a live insurance contract with us or an ongoing claim under your insurance contract.

You have the right to data portability which allows you to obtain the information previously provided to us, in a structured, commonly used and machine readable format. You have the right to request for this data to be transmitted to another data controller or processor, where this is possible.

You have the right to object to the processing of your personal data in respect to direct marketing or on grounds relating to your particular situation at any time.

If you have been subject to an automated decision and do not agree with the outcome, you can ask us to review it.



If you would like to find out more about your data protection rights or exercise any of the rights mentioned above, you can contact our service provider:

Head of Risk and Compliance
Collingwood Insurance Services (UK) Limited
Collingwood House
Redburn Court
Earl Grey Way
North Shields
Tyne and Wear
NE29 6AR

Email: complianceemail@collingwood.co.uk

If you wish to raise a complaint about how we have handled your personal data, you can contact our Data Protection Officer:

Data Protection Officer
Collingwood Insurance Company Limited
7.02 World Trade Center
Bayside Road
Gibraltar
GX11 1AA

Email: enquiries@collingwood.gi

If you are not satisfied with our response or believe we are processing your personal data in a way which is not in accordance with the law, you can complain to the Gibraltar Regulatory Authority at the following address:

Gibraltar Regulatory Authority
2nd Floor
Eurotowers 4
1 Europort Road
Gibraltar
GX11 1AA