

PRIVACY NOTICE

Please take time to read this document carefully as it contains details of the basis on which we will process (such as collecting, using, sharing, transferring) and storing your information. You should show this notice to all parties related to this insurance arrangement. If you have given us information about someone else, you are deemed to have their permission to do so.

If you have any questions or need further information you can e-mail info@mypolicy.co.uk or write to our Data Protection Officer, My Policy Limited, Prospect House, Halesowen B62 8DU.

Use of Information

We (My Policy Limited who is the insurance intermediary with whom you have arranged your insurance) and (My Policy Services Limited, who is a part of the My Policy Group business responsible for our actuarial services) will treat your personally identifiable information strictly in accordance with The General Data Protection Regulations (GDPR) with effect from 25th May 2018.

Data Controller and Data Processor

Principally we will ensure data is processed lawfully, fairly and in an open and transparent manner and ensure appropriate security measures are in place against unauthorised or unlawful processing or accidental loss, destruction or damage using appropriate technical or organisational measures (such as restricting access to key people within our organisation for certain aspects of your information; and periodically checking the level of security we apply to prevent unauthorised use, accidental loss, or misuse of your information).

We are governed by and shall operate strictly in accordance with contracts we have in place with our suppliers (e.g. Insurance Companies, our Software Provider, and similar providers of services to us) which set out our relationship as a processor as required by the GDPR.

As a controller we in certain circumstances also determine the purposes and means of processing data; in particular the data processed by My Policy Services Limited and other processors, such as in our capacity as a placement agent (e.g. when we act as a wholesale distributor of insurance) and our Telematics Device data processor (e.g. our selected third party, Wunelli Limited).

Lawful Bases

Collecting information about you

We will collect personal data which will include a variety of information about you (e.g. your name, address of residence, communication and contact details, and your date of birth). We will also collect where relevant to do so information relating to you indirectly by reference to an identifier (e.g. your IP address, which is a unique number identifying your computer, laptop or similar portable device).

Where required and appropriate to do so, we will also collect more sensitive personal information (such as details about an individual's motoring or criminal convictions, details of health, credit worthiness and other similarly sensitive information).

In certain circumstances (e.g. when an Insurance Company or similar provider of services to us requires us to do so) we will collect information from a variety of different sources (e.g. publicly available sources, such as social media and networking sites; third party databases generally available to the financial services sector, and the wider commerce and industry including, claims management firms, loss adjusters and or other suppliers appointed in the process of handling a claim or credit reference and similar agencies), including information from you regarding your past policies.

Using information about you

We will use information, including sensitive information, about individuals, and other parties related to our group companies' insurance activities, because it is principally:

- a) necessary for the performance of or to take steps for an individual to enter into a contract of insurance; or
- b) it is necessary for compliance with a legal obligation; or
- c) it is necessary to protect the vital interests of a data subject or another person; and
- d) necessary for our own legitimate interests or those of other controllers or third parties (e.g. to search at credit reference agencies, monitor e-mails, calls and other communications or for market research, analysis and developing statistics) except where such interests are overridden by the interests, rights or freedoms of the data subject.

These bases include, providing an insurance quotation, arranging and placement of a policy or wholesale facility, and providing administration throughout the lifecycle of an insurance arrangement as well as assisting with making a claim.

In certain circumstances, such as when you request a quotation, make changes to an existing policy or at each renewal of an insurance arrangement, our assessment may involve an automated decision to determine whether we are able to provide you with an insurance arrangement. You can object to us using an automated decision (see the individual rights section) however in those situations it may prevent us from being able to provide you with insurance.

When processing personal data for profiling purposes either undertaken as part of My Policy Limited's activities, including those as a wholesale distributor of insurance and by My Policy Services Limited, who is a part of the My Policy Group business responsible for our actuarial services; will ensure appropriate safeguards are in place, ensuring:

- a) processing is fair and transparent and provide meaningful information about the logic involved; as well as the significance and the envisaged consequences;
- b) use appropriate mathematical or statistical procedures for the profiling;

- c) appropriate technical and organisational measures are in place to enable inaccuracies to be corrected and minimise the risk of errors; and
- d) secure your personal data in a way that is proportionate to the risk to your interests and rights and prevents discriminatory effects.

We will also use your information when there is a justifiable reason for doing so, such as compliance with legal obligation (e.g. for the prevention and detection of fraud and financial crime, which may include processes which profile you); and for the recording and monitoring of telephone calls for auditing reasons.

Analytics (aggregated information)

By collecting information regarding your current, on-going and past insurance arrangements or policies we will use this to carry out research and analysis (including profiling) principally as part of the actuarial and wholesale services (but not limited to) activities we carry-on to provide insurance arrangements to you now and in the future.

We will do this in such a way, which involves large volumes of information being converted into statistical or aggregated data meaning a particular individual can no longer be identified.

Some aspects of the research and analysis undertaken are separate from using your information directly in connection with your insurance arrangement but are compatible with our activities as a provider of insurance.

Sharing your information

We will share information, including sensitive information, about you, and other parties related to this insurance because it is:

- a) necessary for the performance of or to take steps for you to enter into a contract of insurance; or
- b) necessary for compliance with a legal obligation; or
- c) necessary to protect your vital interests; and or,
- d) necessary for our own legitimate interests or those of other controllers or third parties; and
- e) necessary for a task carried out in the public interest or for an exercise of an official authority (e.g. a regulatory body).

This includes sharing your information with carefully selected third parties providing a service to us or on our behalf, these include, [Insurance Providers](#), My Policy Services Limited (including activities undertaken as a wholesale distributor of insurance) and or Wunelli Limited and or Close Premium Finance Limited.

What we will not do with your information

Unless required to do so by law, or for other similar reasons, other than those outlined (see sharing your information) we will never otherwise share personal information without good reason and without ensuring the appropriate care and necessary safeguards are in place; we will in any other event ask for your consent to share that information and explain the reasons.

How long we will keep information

We will only keep and or maintain information about an individual for as long as is necessary in providing our products and services or for compliance with a legal or regulatory obligation, including our legitimate interests or of a controller (e.g. My Policy Services Limited and other processors, such as our Telematics Device data processor (e.g. Wunelli Limited)).

This means, we will only keep, information that is necessary to keep, necessary to deal with queries, claims and for compliance with legal reasons, usually for a maximum retention period of 14 months for any quotations we may provide which are not converted and or up to a maximum period of 7 years after cessation of a product or service we have provided.

Where we are required to retain information beyond this period (e.g. for legal reasons) we will ensure the data we retain is minimised (so, in the example given here, this would be limited to information which is adequate and relevant for legal reasons).

In the interests of information security, we treat General Packet Radio Service (GPRS) data differently (See GPRS). This category of data is treated in the same way as sensitive data (please see the Sensitive Data section for more information).

This shall be in compliance with the GDPR legislations and using appropriate technical or organisational measures we will regularly:

- a) review the length of time we keep and or maintain information about you;
- b) consider the purpose or purposes why we hold the information about you in deciding whether (and for how long) to retain it;
- c) securely delete information about you that is no longer needed for this purpose or these purposes; and
- d) update, archive or securely delete information about you if it goes out of date.

Sensitive Data

In carrying out our duties as Data Controller and Data Processor we will collect sensitive information, about you, and other parties related to this insurance because it is:

- a) necessary for the performance of or to take steps for you to enter into a contract of insurance; or
- b) necessary for compliance with a legal obligation
- c) necessary to protect your vital interests;
- d) necessary for our own legitimate interests or those of other controllers or third parties; and
- e) necessary for a task carried out in the public interest or for an exercise of an official authority (e.g. a regulatory body).

What we mean by sensitive data includes information such as:

- a) about your health including medical conditions;

- b) motoring or other criminal convictions;
- c) a wide range of journey data (from your telematics device); and
- d) racial or ethnic origin or religious beliefs.

We will always apply additional organisational and technical measures for this category of data, including restrictions to access this data, and key-coding of journey data (this is where your journey data is secured with additional layers of security to prevent misuse and protect personally identifiable information).

GPRS Data

General Packet Radio Service (GPRS) is a packet orientated mobile data technology used by the Telematics Device/Smart Box to transmit information about the way in which the Motor Vehicle in which it is fitted is being driven.

Typically, this is the information you can view in your Driver Dashboard, which includes the last 20 journeys you have undertaken.

Because we treat this type of information in the same way as sensitive data we will only keep journey information that is necessary to keep, and purely for compliance with legal reasons (as described more fully within 'how long we will keep information'), for a minimum retention period of 7 years after cessation of a product or service we have provided.

We will apply appropriate organisational and technical measures for this category of data including restricting access to key people within our organisation for certain aspects of your information (typically this will be in relation to the journey data we maintain outside what you can access in your Driver Dashboard).

In the event that you no longer have a current or on-going insurance arrangement with us, we will usually, after a period of between 12 and 14 months we will take further steps to safeguard your journey data (this is where your journey data is secured with additional layers of security to prevent unauthorised access, misuse and to ensure we always protect personally identifiable information).

More detailed information about the types of information collected can be found in our Telematics Terms and Conditions, including the Telematics Device Terms and Conditions.

Use and storage of your information overseas

We will never knowingly transfer, store, or process information about you outside the European Economic Area (EEA). In any event, if we are compelled to transfer your information outside the EEA (e.g. because it is an insurance arrangement with an Insurance Company who is outside the EEA or part of a larger group of companies who pass information outside the EEA) it shall be in compliance with the conditions for transfer set out in the GDPR and or restricted to a country which is considered to have adequate data protection laws, and all reasonable steps shall typically have been undertaken to ensure the firm has suitable standards in place to protect your information.

Using our Website and Cookies

You will be asked to accept a cookie, which is a small file of letters and numbers that is downloaded on to your computer when you visit our website. This will be clearly explained to you when you visit our website and you will typically have to accept the cookie to benefit from the services our website can offer.

Cookies are operated in strict accordance with Privacy and Electronic Communications Regulations 2011 (PECR) and are widely used by many websites and enable our website to remember your preferences, recording information you have entered.

These same rules also apply if you access or use any other type of technology to gain access to information stored electronically by us (e.g. the My Policy Limited app using your smartphone or similar portable device or the My Policy Driver Dashboard).

Individual Rights

You have a number of rights relating to the information we hold about you, these rights include but are not limited to:

- a) a copy of your personal information we hold (we have a maximum of one month to give you this information);
- b) rectify information, if it is inaccurate or incomplete;
- c) request the deletion or removal of your personal data where there is no compelling reason for its continued processing;

- d) suppress processing of your personal data, when processing is restricted, we are permitted to store the personal data, but not further process it. We will retain sufficient information about the individual to ensure that the restriction is respected in future (see Marketing);
- e) object to certain uses of your personal information (see Marketing);

- f) in certain circumstances to not be subject to a decision when it is based on automated processing; and/or it produces a legal effect or a similarly significant effect on you;
- g) withdraw any permission you have previously provided; and
- h) complain to the Information Commissioner's Office at any time if you are not satisfied with our use of your information.

You can request a copy of your personally identifiable information we hold by contacting us. You have a right to data portability so we will normally, not only provide the information free of charge (however we may apply a charge where information requests are excessive) but we will provide that information in a format that is easily accessible, typically in a CSV format, should you require it to allow your information to be exchanged easily with other organisations.

For further information please e-mail info@mypolicy.co.uk or write to our Data Protection Officer, My Policy Limited, Prospect House, Halesowen B62 8DU.

Marketing Section

Separately we will always ask for your permission (consent) to contact you, including the means to contact you (such as by phone, or e-mail, push notifications, SMS text, or post) to tell you about;

- a) new products or services we have or are developing;
- b) trialling products and services which we think may improve our service to you or our business processes;
- c) offer you rewards;
- d) enter you into a competition.

We will typically ask for your permission when you first contact us (usually on our website), but you will maintain the right to easily withdraw your consent whenever you wish (unsubscribe). We will regularly review your consent to check that your relationship with us and the processing and the purposes have not changed.

We will have processes in place to refresh your consent at appropriate intervals, including any parental consents and act on withdrawals of consent (unsubscribe) as soon as we can and not penalise you if you choose not to give or later choose to withdraw your consent.

Analytics (consent to wider use)

In certain circumstances it may be helpful to us if we are able to use personally identifiable information we hold about you, specifically relating to your current, ongoing and past insurance arrangements or policies, on a wider basis, which means the information we may process may contain personally identifiable information which can identify an individual including after you no longer have any insurance arrangement with us.

If we want to do this, we will ask you specifically for your permission (consent) to use the information we hold about you for research and analysis (including profiling), such as when you take out or renew an insurance policy with any of our group companies. This activity will typically be undertaken as part of the actuarial services we carry-on to enable us to provide wider insurance arrangements to the insurance market now and in the future.

It is important that you understand that this is separate from using your information when you have an insurance arrangement in place with us and that it is not compulsory for you to allow us to do this.

If you choose to let us use your information in this way (specific consent) we will treat the information in the same way as sensitive data and we will only continue to process that information, including your GPRS journey information that is necessary for any such research, development and statistical analysis, in the same way as we would treat your information even if you cease to have in place any current insurance arrangement with us.

We will continue to apply additional organisational and technical measures for certain sensitive categories of data, including restrictions to access that data, and where appropriate key-coding of journey data (this is where your journey data is secured with additional layers of security to prevent misuse and protect personally identifiable information).

We will regularly review this specific (Research and analysis) consent to check that your relationship with us and the processing and the purposes have not changed.

We will have processes in place to refresh your consent at appropriate intervals, including any parental consents and act on withdrawals of consent (unsubscribe) as soon as we can and not penalise you if you choose not to give or later choose to withdraw your consent.

Group Companies

Our group companies (who from time to time may be operating under a number of trading names) include:

My Policy Limited who is an insurance intermediary, and also acts as a distributor (wholesaler) of insurance; and
My Policy Services Limited who provides our actuarial services.

For more information on the My Policy Group companies please visit www.mypolicy.co.uk

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