

# PRIVACY NOTICE

## **You must read this Privacy Notice carefully as it explains how we use your personal information**

In taking out this Insurance Policy with Mulsanne Insurance Company Limited, **you** or **your insurance intermediary** have supplied **us** with **your** personal information, and this Privacy Notice explains how **we** will use it. In this Privacy Notice, "**we**", "**us**" and "**our**" refers to Mulsanne Insurance Company Limited.

When **we** say, "**you**" and "**your**" in this notice, **we** mean anyone whose personal information **we** may collect, including:

- Anyone seeking an insurance quote from **us** or whose details are provided during the quotation process.
- Policyholders and anyone named on or covered by the policy.
- Anyone who may benefit from or be directly involved in the policy or a claim, including claimants and witnesses.

## **Who we are**

Mulsanne Insurance Company Limited is an insurance company owned by Ormiston Holdco Limited and act as a Data Controller. **We** are part of a Group of Companies including Complete Cover Group Limited, Hyperformance Limited, Key Claims and Administration Services Limited, Dayinsure.com Limited and Abacai Technologies Limited.

**Our** offices are located at 5/5 Crutchetts Ramp, Gibraltar, GX11 1AA.

## **Providing consent**

When providing personal information about others, **you** confirm that **you** have the consent of these individuals to supply their personal information. **We** are unable to offer **you** any product or service unless **you** provide explicit consent for the collection and use of sensitive personal data as defined in data protection laws.

**You** have the right to withdraw consent at any time (see 'Your Rights'). This may limit or terminate the contract of insurance that **you** originally entered into with **us**. Due to legal obligations with road traffic laws and regulatory requirements **we** may not be able to remove **your** personal information.

## **How we use your information**

Before **we** provide services, goods or financing to **you**, **we** undertake checks for the purposes of preventing fraud and money laundering, and to verify **your** identity. These checks require **us** to process personal data about **you**. **Your** information includes personal details that **you** provided to **us** or **your insurance intermediary**, which is then used in a number of ways to process **your** insurance application, administer **your** insurance policy or any subsequent claim that **you** may make. The processing of the information **you** provide is necessary for the performance of the contract, including:

- Providing quotes;
- Performing vehicle and driving licence check, and validating information provided;

- Maintaining and updating **your policy** record;
- Administering **your policy** including handling claims;
- The renewal of **your policy**;
- Processing any claim that **you** or someone else makes;
- Understanding **our** customer's needs and requirements;
- Analysing and research of products and services provided in our Group of Companies;
- Analysing the premium, and terms and conditions **we** offer where automated decision making applies;
- Performing credit checks and validating information provided to **us**;
- Dealing with complaints;
- Preventing financial crime to meet **our** legal obligations.

Where **we** process special categories of data (including data relating to health or criminal convictions), **we** will do this on the basis that it is necessary for the performance of **your** insurance contract and for reasons of substantial public interest.

### **Automated decision making, including profiling**

**We** may use profiling and automated decision making, to assess insurance risks, detect fraud, and administer **your policy**. As part of the processing of **your** personal data, 'accept' or 'decline' decisions may be made by automated means. This means **we** may automatically decide that **you** pose a fraud or money laundering risk if:

- **our** processing reveals **your** behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with **your** previous submissions; or
- **you** appear to have deliberately hidden **your** true identity.

This helps **us** decide whether to offer **you** insurance, determine prices and validate claims. If **you** disagree with the outcome of an automated decision please contact **our** Head of Operations by email at [info@mulsanneinsurance.com](mailto:info@mulsanneinsurance.com) or by phone on 0344 573 1241 and **we** will review the decision.

**We** also use computer systems to carry out modelling. Sometimes using **your** personal information and sometimes using data in anonymised form. **We** conduct this modelling for a variety of reasons, for example, for risk assessment purposes to make decisions about **you**, such as **your** likelihood to claim. However, **we** may also use **your** personal information in that modelling to make decisions about how **we** improve and develop **our** products and services, or **our** pricing, or to better understand how **our** prospective customers make decisions about which policy is the optimal policy (i.e. **we** are not making decisions directly about **you**).

### **What personal information we collect**

**We** collect the following types of personal information about **you** so **we** can complete the activities explained in "**How we use your information:**"

- Basic personal details such as name, age, address and gender
- Family, lifestyle and social circumstances, such as marital status, dependants and employment type
- Financial details such as bank account, direct debit or payment card information, and other information to access **your** financial status
- Vehicle details
- Photographs and/or video to help **us** manage policies and assess claims
- Tracking and location information if it is relevant to **your** policy or claims, and in some cases surveillance reports

- Identification checks and background information about **you we** need to collect in order to assess the risk to be insured including previous claims information, data relating to **your** health and criminal convictions, included requesting a copy of **your** driving licence summary;
- Medical information if it is relevant to **your policy** or claim
- Accessibility details if **we** need to make reasonable adjustments to help
- Business activities if it is relevant to **your policy** or claim
- Credit history, credit score, sanctions/PEP (politically exposed person) check results and information received from various anti-fraud databases about **you**.
- Identifiers assigned to **your** computer or other internet connected device including **your** Internet Protocol (IP) address.

### **How we collect personal information**

**We** may collect personal information from various sources including **you**, **your** representative, **your** employer or from publicly available sources, including information **you** have made public, for example on social media.

**We** also collect information from other persons or organisations, for example:

- Credit reference and/or fraud prevention agencies such a TransUnion
- Emergency services, law enforcement agencies, medical and legal practices
- Insurance industry registers and databases used to detect and prevent insurance fraud, for example the Claims and Underwriting Exchange (CUE)
- Governmental and regulatory bodies such as HMRC, MIB (Motor Insurers' Bureau), the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service, the Information Commissioner's Office, and the Insurance Fraud Bureau (IFB)
- Insurance investigators and claims service providers
- Service providers who provide the service for **our** products
- Debt collection agencies who collect money owed to **us**
- Other involved parties, for example; claimants or witnesses.

### **Who do we share your information with**

**We** may share **your** personal information with third parties and other companies within **our** Group of Companies for the purposes mentioned in '**How we use your information**', please contact the Data Protection Officer for a full list of Group companies.

**We** may share **your** information with third parties, including **our** product and service suppliers, or other insurers, reinsurers, parties involved in handling a claim, the MIB (Motor Insurers' Bureau), and fraud prevention agencies including the Insurance Fraud Bureau (IFB) <https://insurancefraudbureau.org/> . **We** may also share with the police and government bodies if **we** believe that this is reasonably required for the prevention and detection of crime and fraud. This assists in keeping **your** premiums low.

**We** may also share **your** information with other companies within the Group that administer policies on **our** behalf or prospective buyers or purchasers in the event **we** or the Group of Companies wishes to sell all or part of its business.

**We** may pass **your** details and any information or documentation **you** provide to **us** to the recognised centralised insurance industry registers and databases, credit reference agencies, and policy and claims

checking systems. Data may also be released to third parties if **we** are required to do so under the terms of a court order or for regulatory purposes or in the investigation and settlement of a claim or a complaint.

When **we** and fraud prevention agencies process **your** personal data, **we** do so on the basis that **we** have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect **our** business and to comply with laws that apply to **us**. Such processing is also a contractual requirement of the services or financing **you** have requested.

**We**, and fraud prevention agencies, may also enable law enforcement agencies to access and use **your** personal data to detect, investigate and prevent crime.

Fraud prevention agencies can hold **your** personal data for different periods of time, and if **you** are considered to pose a fraud or money laundering risk, **your** data can be held for up to six years.

**We** will only share **your** information in compliance with data protection laws.

### **CONSEQUENCES OF PROCESSING**

If **we**, or a fraud prevention agency, determine that **you** pose a fraud or money laundering risk, **we** may refuse to provide the services, goods or financing **you** have requested, or to employ **you**, or **we** may stop providing existing services to **you**.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to **you**. If **you** have any questions about this, please contact **us** please contact **our** Head of Operations by email at [info@mulsanneinsurance.com](mailto:info@mulsanneinsurance.com) or by phone on 0344 573 1241.

### **How long will we keep your information**

**We** will only hold **your** information for as long as necessary to administer the policy, manage **our** business or in order to comply with legal or regulatory requirements. This will be in line with **our** data retention policy.

### **Transferring personal information outside the UK**

Some of the organisations **we** share **your** personal information with may be located in the European Union (EU) where **your** personal information is protected by laws equivalent to those in the UK. If **we** have to transfer data to organisations in a third country outside the EU, **our** contracts with these parties require them to provide an equivalent levels of protection for **your** personal information to ensure **your** data continues to be protected by ensuring appropriate safeguards are in place.

### **Your rights**

**You** have the right to:

- Object to **us** using **your** personal information. **We** will either agree to stop using it or explain why **we** are unable to;
- Ask for a copy of the personal information **we** hold about **you**, subject to certain exemptions;
- Ask **us** to update or correct **your** personal information to keep it accurate;
- Ask **us** to delete **your** personal information from **our** records if it is no longer needed for the original purpose;
- Ask **us** to restrict the use of **your** personal information in certain circumstances;
- Ask for a copy of the personal information **you** provided to **us**, so **you** can use it for **your** own purposes;

- Ask **us**, at any time, to stop using **your** personal information, if using it is based only on **your** consent;
- Complain about how **we** handle **your** data (see 'Who to contact' below).

### **Who to contact**

If **you** wish to exercise any of **your** rights, or have any queries about how **we** use **your** personal information, please contact **our** Data Protection Officer by email at [dataprotection@mulspanneinsurance.com](mailto:dataprotection@mulspanneinsurance.com).

**We** will consider **your** request and either comply with it or explain why **we** are not able to. Please note, **we** may request evidence of **your** identity to process **your** request.

If **you** are not happy with any aspect of how **we** handle **your** data, **we** encourage **you** to come to **us** in the first instance but **you** are entitled to complain to the Gibraltar Regulatory Authority, 2nd floor, Eurotowers 4, 1 Europort Road, Gibraltar, or ☎ (+350) 20074636, or email [info@gra.gi](mailto:info@gra.gi).

If however **you** wish to complain to the Information Commissioner's Office (ICO) in the United Kingdom then contact the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, or ☎ 0303 123 1113, or via the contact links on their website: <https://ico.org.uk/concerns/>.