



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 acts as a Data Controller. **Our** offices are located at First Floor, Grand Ocean Plaza, Ocean Village, Gibraltar.

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

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;
- 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 our products and services;
- 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**. 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** Operations Manager by email at info@mulsanneinsurance.com or by phone on 0344 573 1241 and **we** will review the decision.

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 direct debit or payment card information
- 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.
- 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 and information received from various anti-fraud databases about **you**.

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
- 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)
- Insurance investigators and claims service providers
- Service providers who provide the service for **our** products
- Other involved parties, for example; claimants or witnesses.

Who do we share your information with

We may share **your** information with third parties, including **our** product and service suppliers, agents, or other insurers, reinsurers, parties involved in handling a claim, fraud prevention agencies and 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 Mulsanne Insurance Company 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.

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

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 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.

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 Manager by email at info@mulsanneinsurance.com or by phone on 0344 573 124.

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. (+350) 20074636 email info@gra.gi.