

# 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 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](mailto: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, or other insurers, reinsurers, parties involved in handling a claim, and fraud prevention agencies. **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 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 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.

### **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@mulsanneinsurance.com](mailto:dataprotection@mulsanneinsurance.com), or write to the Data Protection Officer, 18-19 Station Road, Sunbury on Thames, Surrey, TW16 6SU.

**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/>.