

PRIVACY NOTICE

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

This is the Privacy Notice of **Mulsanne Insurance Company Limited** and **Key Claims and Administration Services Limited**, who are committed to ensuring that **your** privacy is protected. This Privacy Notice explains the information that **we** may collect from **you** and how it may be used.

In this Privacy Notice, “**we**”, “**us**” and “**our**” refers to **Mulsanne Insurance Company Limited** and/or **Key Claims and Administration Services 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.

This Privacy Notice explains:

1. **About us**
2. **Providing consent**
3. **How we use your information**
4. **Automated decision making, including profiling**
5. **What personal information we collect**
6. **How We Collect Personal Information**
7. **Who Do We Share Your Personal information with**
8. **Consequences of processing**
9. **How long we keep your information**
10. **Transferring information outside of the UK**
11. **Your rights**
12. **Who to contact**

1. ABOUT US

Mulsanne Insurance Company Limited is an insurance company:

- registered in Gibraltar company number 101673.
- registered office: 5/5 Crutchetts Ramp, Gibraltar, GX11 1AA.
- authorised by the Gibraltar Financial Services Commission to carry on insurance business under the Financial Services (Insurance Companies) Regulations 2020.

In taking out this Insurance Policy with **Mulsanne Insurance Company Limited**, **you** or **your** insurance intermediary have supplied **us** with **your** personal information. Any personal information is used by **us** to administer **your** insurance policy or to handle any claim that **you** might have.

Key Claims and Administration Services Limited is a company that provide claims handling and administrations services on behalf of **Mulsanne Insurance Company Limited**:

- registered in England and Wales, under company number 09959613
- registered office: Mara House, Tarporley Business Centre, Nantwich Road, Tarporley, CW6 9UY.

We are owned by Ormiston Holdco Limited and act as a Data Controllers and are part of a Group of Companies including Complete Cover Group Limited, Dayinsure.com Limited and Abacai Technologies Limited.

2. 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** or limit or terminate **our** claims handling role. Due to legal obligations with road traffic laws and regulatory requirements **we** may not be able to remove **your** personal information.

3. 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 **your** insurance contract, including:

- Providing quotes;
- Performing vehicle and driving licence checks, and validating information provided;
- Maintaining and updating **your** policy and/or claim 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.

4. AUTOMATED DECISION MAKING, INCLUDING PROFILING

We may use profiling and automated decision making, to assess insurance risks, detect fraud, and administer **your** policy and handle **your** claim. 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:

- dataprotection@mulsanneinsurance.com

and the Head of Claims will review the decision relating to claims and the Head of Operations for any other matter.

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**).

5. 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 or any claim that is made, including:
 - previous claims information.
 - data relating to **your** health and criminal convictions.
 - 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.

6. HOW WE COLLECT YOUR 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 as 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.

7. 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. Any sharing of your personal information with **our** Group of Companies will be in the interest of preventing fraud and analysing claims data which shall be anonymised.

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 insurance 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.

The Motor Insurer's Bureau (MIB).

We work in partnership with the Motor Insurers' Bureau (MIB) and associated not-for-profit companies who provide several services on behalf of the insurance industry. At every stage of **your** insurance journey, the MIB will be processing **your** personal information and more details about this can be found via their website: mib.org.uk. Set out below are brief details of the sorts of activity the MIB undertake:

- Checking **your** driving licence number against the DVLA driver database to obtain driving licence data (including driving conviction data) to help calculate **your** insurance quote and prevent fraud;
- Checking **your** 'No Claims Bonus' entitlement and claims history;
- Prevent, detect and investigate fraud and other crime, including, by carrying out fraud checks.
- Maintaining databases of:
 - o Insured vehicles (Motor Insurance Policy Database/MIPD or Motor Insurance Database/MID)
 - o Vehicles which are stolen or not legally permitted on the road (Vehicle Salvage & Theft Data or MIAFTR)
 - o Motor, personal injury and home claims (CUE)
 - o Employers' Liability Insurance Policies (Employers' Liability Database)
- Managing insurance claims relating to untraced and uninsured drivers in the UK and abroad;
- Working with law enforcement to prevent uninsured vehicles being used on the roads;
- Supporting insurance claims processes.

8. 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, may refuse to handle **your** claim, 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:

- dataprotection@mulanneinsurance.com

and the Head of Claims will respond if relating to a claim and the Head of Operations for any other matter.

9. HOW LONG WE WILL 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.

10. 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.

11. 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).

12. WHO TO CONTACT

If **you** wish to:

- exercise any of **your** rights as detailed in “**Your Rights**” above;
 - make a complaint relating to Data Protection in any way;
- or
- have any queries about how **we** use **your** personal information;

please contact **our** Data Protection Officer in the first instance by email at:

- dataprotection@mulsanneinsurance.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.

You are entitled 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/>.

If **you** are specifically unhappy about how **Mulsanne Insurance Company Limited** has handled your data **you** are also entitled to complain to the Gibraltar Regulatory Authority, 2nd floor, Eurotowers 4, 1 Europort Road, Gibraltar, or ☎ (+350) 20074636, or email info@gra.gi