

## Third Party Claimants Privacy Notice

### Who does the Privacy Notice apply to?

The security and privacy of personal information is very important to us and we are committed to protecting it. This third party privacy notice covers individuals or businesses who may be involved in a claim, who do not hold a contractual relationship with our insurers and where we have been appointed as claims handler on behalf of our insurer (for example, where you have been involved in a claim with one of our insurers policyholders or named drivers or witness in a claim).

This notice explains how we collect and use personal information about you.

### Who we are

Somerset Bridge Limited ('we', 'us', or 'our') provides a claims handling function on behalf of Alwyn Insurance Company Limited and Watford Insurance Company Europe Limited. Somerset Bridge Limited is the "controller" of your personal data. This means we are responsible for deciding how we hold and use personal information. It is important that you read this notice so that you are aware of how and why we are using such information and what your rights are under data protection laws.

We have appointed a Data Protection Officer who is responsible for overseeing compliance in relation to this privacy notice. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Data Protection Officer at Somerset Bridge Limited, Lysander House, Catbrain Lane, Bristol, BS10 7TQ or by emailing [DPO@Somersetbridgelimited.co.uk](mailto:DPO@Somersetbridgelimited.co.uk)

### [If you've been involved in an incident with a vehicle insured by one of our insurers](#)

#### What personal information we collect and where we collect it from

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We obtain a variety of personal information from you, or from our insurers policy holders or named drivers if details were exchanged at the time of the incident where relevant to your claim:

- **Individual details:** Your name, address, contact details (e.g. email/telephone), gender, marital status, date of birth, nationality.
- **Employment information:** Your job title and the nature of the industry you work in.
- **Identification details:** Your national insurance number, passport information, driving licence number.
- **Photo or video data:** Includes photos or footage recorded relating to a claim (including accident circumstances and interviews).
- **Previous and current claims:** Any previous insurance policies you have held and claims made against those policies.
- **Information which may be relevant to your claim:** This includes the name and contact details of your insurer, details about your car/property and details about your claim (including any statements, photos/video footage, claims assessment reports and driving data). This information may include the following **special categories of information** relating to you:

- **Health data:** Physical or mental health factors and injuries which are relevant to your claim (e.g. where you've been injured in a motor accident and the driver is insured with one of our insurers). This may include medical records relating to any previous injuries.
- **Criminal convictions:** Any which are unspent under the Rehabilitation of Offenders Act. This includes motoring and non-motoring offences/alleged offences you have committed or any court sentences you're subject to.
- **Financial information:** Bank and payment information.
- **Website use, including cookies and use of our web chat service:** See section 3.4 below for details.
- **Other information:** Any information that we capture during recordings of our telephone calls or if you make a complaint. This may include **special categories of information** you volunteer when communicating with us. We'll only process such information to the extent necessary in connection with the claim or in connection with legal proceedings. Any further processing will only be with your explicit consent.
- **Business Information:** If you are claiming on behalf of a business, we may obtain information in connection with your business.

We use external sources to supplement and verify the information above and also to provide the following new information:

- **Individual details:** Your name, address, contact details (e.g. email/telephone), date of birth and nationality.
- **Credit and anti-fraud data:** Credit history, credit score, sanctions and criminal offences, bankruptcy orders, individual voluntary arrangements (IVAs) or county court judgments, and information received from various anti-fraud databases. Some of this information (e.g. criminal offences) may include special categories of information relating to you.
- **Demographic data:** Lifestyle indicators such as income, education and size of your household.
- **Open source data:** Other information which is publicly available (including social media), which relates to you or the circumstances of any accident.

The external sources that provide us with information about you include:

- Other parties involved in your claim, including any named individual insured with one of our insurers, passengers, witnesses or other third party claimants.
- Other group companies that are part of Somerset Bridge Limited.
- Third party suppliers we use to help us:
  - Carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, debt collection agencies, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
  - Provide a service in relation to a claim (e.g. external claims handlers, our accident repair network, medical experts, fraud investigators, claims investigators and, in limited circumstances private investigators).
- Credit reference agencies.
- Data enrichment providers to assist in contact details for the processing of any claim.

- Providers of demographic data and vehicle data.
- Financial crime detection agencies and insurance industry databases (e.g. for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as 'CUE'), Insurance Fraud Register, Motor Insurance Database and CIFAS.
- Insurance industry bodies and databases (including, but not limited to, Motor Insurers Bureau, the Motor Insurance Anti-Fraud and Theft register and the No Claims History database).
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, Ministry of Justice or Regulators (e.g. ICO, Financial Conduct Authority).
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media) and sources licensed under the Open Government Licence v3.0.
- The police and other crime prevention and detection agencies. We and fraud prevention agencies may enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
- Other third parties involved in your insurance policy or a claim (e.g. other insurers).

#### **What we use your personal information for**

We may use your personal and/or special categories of personal information for different purposes. We must have a legal ground for each purpose and we'll rely on the following grounds:

- We have a legitimate interest to use your personal information (e.g. to keep a record of the decisions we make when different types of applications are made, keep business records, carry out strategic business analysis, review our business planning and develop and improve our products and services). When using your personal information in this way, we'll always consider your rights and interests.
- We have a legal or regulatory obligation to use your personal information. This means where we are subject to laws that requires us to do so (e.g. to meet the record-keeping requirements of our regulators).
- We may search against publicly available information (the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media). We do this to validate any claim for compensation and also to assist with the detection and prevention of fraud.

For **special categories of information**, we must have an additional legal ground for processing. We'll rely on the following:

- It's in the substantial public interest and it's necessary for an insurance purpose (e.g. to investigate, administer and settle insurance claims), or to prevent and detect an unlawful act (e.g. fraud).
- To establish, exercise or defend legal claims e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves), or assessing the compensation on a personal injury related claim.

## How we use your information

Type of processing	Grounds for using personal information	Grounds for special categories
<b>To manage claims</b>	<ul style="list-style-type: none"> <li>○ We have a contract with one of our insurers data subjects to manage their claim on their behalf</li> <li>○ We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>○ To establish, exercise or defend legal claims</li> <li>○ Where you have given us your explicit consent to do so</li> </ul>
<b>To verify your identity, prevent and investigate fraud</b>	<ul style="list-style-type: none"> <li>○ We have a legal obligation to prevent or detect unlawful acts</li> </ul>	<ul style="list-style-type: none"> <li>○ It's in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud)</li> <li>○ To establish, exercise or defend legal claims</li> </ul>
<b>To comply with our legal or regulatory obligations</b>	<ul style="list-style-type: none"> <li>○ We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>○ To establish, exercise or defend legal claims</li> <li>○ It's necessary for an insurance purpose</li> </ul>
<b>To communicate with you in any way and/or resolve any complaints you might have</b>	<ul style="list-style-type: none"> <li>○ We have a contract with one of our insurers data subjects to manage their claim on their behalf</li> <li>○ You've given us your explicit consent</li> </ul>	<ul style="list-style-type: none"> <li>○ You've given us your explicit consent</li> <li>○ To establish, exercise or defend legal claims</li> </ul>
<b>To provide improved quality, training and security (e.g. through recorded or monitored phone calls to/from us or customer satisfaction surveys)</b>	<ul style="list-style-type: none"> <li>○ You've given us your explicit consent</li> </ul>	We won't process your special categories of information for this purpose
<b>Managing our business operations (e.g. keeping accounting records, analysing financial results, meeting audit requirements, receiving professional advice and holding our own insurance)</b>	<ul style="list-style-type: none"> <li>○ We have a legal or regulatory obligation</li> </ul>	We won't process your special categories of information for this purpose
<b>For insurance administration purposes including trend analysis, actuarial work, pricing analysis, analysis of customer experience, planning service delivery, risk assessment and costs and charges</b>	<ul style="list-style-type: none"> <li>○ We have a legitimate interest (to develop and improve our products and services)</li> </ul>	We won't process your special categories of information for this purpose

## Who we share your personal information with

Where necessary, we will share your information with other companies or brands within our group of companies and/or with the following third parties for the purposes laid out in the table above:

- Third parties involved in administration in any part of the claim. These include loss adjusters, claims handlers, private investigators, data enrichment providers to gain contact details, accountants, auditors, banks, lawyers and other experts including medical experts.
- Other insurers (e.g. where another insurer has previously provided you with a policy or handled a claim) and our reinsurers.
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- Insurance brokers and other intermediaries.
- Credit reference agencies.
- Insurance industry bodies and databases (including, but not limited to, Motor Insurers Bureau, the Motor Insurance Anti-Fraud and Theft register and the No Claims History database).
- Financial crime detection agencies and insurance industry databases (e.g. for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as 'CUE'), Insurance Fraud Register, and Motor Insurance Database.
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, Ministry of Justice or Regulators (e.g. ICO, Financial Conduct Authority).
- The police and other crime prevention and detection agencies. We and fraud prevention agencies may enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

### Where you witnessed an incident involving one of our insurers customers and are not making a claim

#### What personal information we collect and where we collect it from

We'll collect the following personal information from you where relevant:

- **Individual details:** Your name, address, contact details (e.g. email/telephone), gender, date of birth and nationality.
- **Employment information:** Your job title and the nature of the industry you work in.
- **Claims information:** In relation to any incident or alleged incident you've witnessed.
- **Photo or video data:** Includes photos or footage recorded relating to a claim (including accident circumstances and interviews).
- **Other information:** Any information that we capture during recordings of our telephone calls or if you make a complaint. This may include other **special categories of information** you volunteer when communicating with us about the incident you witnessed. We'll only process this information where it relates to the incident itself or legal proceedings. Any further processing will only be with your explicit consent.

We use external sources to supplement and verify the information above and also to provide the following new information. We would always have a justification and be proportionate:

- **Claims assessment reports:** By both claims investigators, and in limited circumstances, private investigators.

- **Open source data:** Unstructured data in the public domain, including social media, about you or the circumstances of any accident.

The external sources that provide us with information about you include:

- Other parties involved in the incident you witnessed (such as any named individual insured through us, passengers, other witnesses, third party claimants, brokers, insurers and the emergency services).
- Other third parties who provide a service in relation to a claim (such as external claims handlers, our accident repair network, medical experts, claims investigators and, in limited circumstances, private investigators).
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media).

### What we use your personal information for

We may process your personal information for a number of different purposes. We must have a legal ground for each purpose and we'll rely on the following grounds:

- We have a legal or regulatory obligation to use your personal information (our regulators impose certain record-keeping rules which we must adhere to).
- We have a legitimate interest to use your personal information (e.g. to keep a record of the decisions we make regarding a claim. When using your personal information in this way, we'll always consider your rights and interests).

We must have an additional legal ground for processing **special categories of information**. We'll rely on the following:

- It is necessary for an insurance purpose and it is in the substantial public interest.
- This will apply where we're helping with any claims under a policy (we'll only rely on this legal ground if we've not been able to obtain or you've not given us your explicit consent) and undertaking any activities to prevent and detect fraud.
- To establish, exercise or defend legal rights (e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves).

### How we use your personal information and the legal grounds we rely on:

Type of processing	Grounds for using personal information	Grounds for special categories
<b>To investigate and manage claims made under an insurance policy</b>	<ul style="list-style-type: none"> <li>○ We have a contract with one of our insurers data subjects to manage their claim on their behalf</li> <li>○ You've given us your explicit consent</li> </ul>	<ul style="list-style-type: none"> <li>○ You've given us your explicit consent or it's necessary for an insurance purpose</li> <li>○ To establish, exercise or defend legal rights</li> </ul>
<b>To comply with our legal or regulatory obligations</b>	<ul style="list-style-type: none"> <li>○ We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>○ You've given us your explicit consent</li> <li>○ To establish, exercise or defend legal rights</li> </ul>

Type of processing	Grounds for using personal information	Grounds for special categories
<b>To prevent and investigate fraud</b>	<ul style="list-style-type: none"> <li>○ We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>○ It's in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud)</li> <li>○ To establish, exercise or defend legal rights</li> </ul>

### Who we share your personal information with

Where necessary, we will share your information with other companies or brands within our group of companies and/or with the following third parties for the purposes laid out in the table above:

- Other parties involved in the claim you witnessed.
- Other insurers (e.g. where another insurer is also involved in the claim which relates to the claim you witnessed) and our reinsurers.
- Third parties involved in the administration of an insurance policy or claim. These include loss adjusters, claims handlers, accountants, auditors, banks, lawyers, medical experts and, in limited circumstances, private investigators.
- Third party suppliers we use to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisors.
- Insurance industry bodies and databases (including, but not limited to, Motor Insurance Bureau, the Motor Insurance Anti-Fraud and Theft register and the No Claims History database).
- Financial crime detection agencies and insurance industry databases (e.g. for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as 'CUE'), Insurance Fraud Register, and Motor Insurance Database.
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or regulators (e.g. ICO, Financial Conduct Authority).
- The police and other crime prevention and detection agencies. We and fraud prevention agencies may enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

### Automated Decision Making

If you make a claim under one of our insurers' policy, we use automated systems to help manage and settle the claim, including assessing compensation on a personal injury claim. We take account of the information you have provided about you, details of the policy and details of the claim. We may also validate the claim against third-party databases, including public databases. We use the information to determine the cost of the claim and how to settle the claim such as repairing, replacing or providing cash settlement, and any support or compensation on claim related personal injury.

To help us prevent and detect crime, we evaluate and predict whether your conduct accessing our products or services suggests a risk of fraud. You may automatically be considered to pose a fraud or money laundering risk if our processing of your personal data:

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

This activity is essential to allow us to decide whether there's a risk of fraud, which may result in us refusing to accept your claim.

### **International Data Transfers**

We and our appointed third party service providers may transfer and process personal information outside the UK or European Economic Area. To protect your personal information, transfers are subject to data safeguards, to ensure compliance with applicable data protection laws. For example, where necessary we will put in place contractual agreements approved by the UK or European Commission to ensure an adequate level of protection for the personal data.

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents and other third parties who have a business need to know. Your personal data will only be processed on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any personal data breach (whether suspected or actual) and will notify you and any applicable regulator of a breach where we are legally required to do so, or where we believe you have the right to know of such breach.

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

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

To determine the appropriate retention period for your personal data, we consider the amount, nature and sensitivity of your personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. If you would like further information about how long we keep your personal data, please contact the Data Protection Officer using the contact details above.

### **Your legal rights**

Under certain circumstances, you have the rights under data protection laws in relation to your personal data. The rights available to you depend on our reason for processing your information. If you have any queries or concerns, please contact us at [dpo@somersetbridgelimited.co.uk](mailto:dpo@somersetbridgelimited.co.uk)

- Right of access. You have the right to ask us for copies of your personal information. You can always rely on this right, but there are some exemptions, which means you might not always receive all the information we process.



- request rectification of Your personal data if it is inaccurate or incomplete;
- request erasure of Your personal data in certain circumstances;
- restrict our use of Your personal data in certain circumstances;
- move (or port) personal data. This only applies to information you have given us. You have the right to transfer the information you gave us from one organisation to another, or give it to you.;
- object to the processing of your data where our legal basis for processing is based on our legitimate interests.

If you would like to exercise any of your data protection rights, please contact the Data Protection Officer using the contact details confirmed above. Please note that there may be times when we will not be able to delete, restrict or cease the processing of your information. This may be a result of fulfilling our legal and regulatory obligations. If we are unable to fulfil a request, we will explain this to you.

### **Complaints**

If you have any queries or concerns, please contact us at [dpo@somersetbridgelimited.co.uk](mailto:dpo@somersetbridgelimited.co.uk) or via the postal address confirmed above and we will respond to you. We take complaints we receive seriously and encourage you to contact us directly if you are unhappy.

If you remain dissatisfied, or you would prefer not to discuss the issue with us, you can also make a complaint to the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

### **Changes to this Notice**

This notice was last updated November 2023.

We will update this notice from time to time to ensure it continues to reflect the way we collect and use your personal data.