

SOMERSET BRIDGE LIMITED

PRIVACY NOTICE

The security and privacy of your personal information is very important to us and we are committed to protecting it. This privacy notice explains how we collect and use your personal information. You and any person you request be covered under your insurance policy should read this notice carefully as it sets out your rights and our obligations to you. By providing us with information about another person you are confirming you have the legal right to provide their information to us and that they understand how their information will be used. In this notice, you/your refers to the policyholder and/or any other person insured or potentially insured by the contract of insurance or potential contract.

Who we are

Somerset Bridge Limited is the “controller” of your personal data. This means we are responsible for deciding how we hold and use personal information about you.

We have a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, 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 dpo@somersetbridgelimited.co.uk

Somerset Bridge Limited is a managing general agent which places insurance with its panel of insurers backed by Alwyn Insurance Company Limited, Southern Rock Insurance Company Limited and Watford Insurance Company Europe Limited. Your insurer will also be a controller of your personal information and their name and contact details can be found in your Certificate of Insurance. Please read your insurer’s privacy notice for information about how your insurer uses your personal information, as this may differ from this privacy notice.

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and reinsurers. The London Insurance Market Core Uses Information Notice (<https://img.london/wp-content/uploads/2019/07/LMA-Insurance-Market-Information-Uses-Notice-post-enactment-31-05-2018.pdf>) sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. For further information we recommend you review this notice.

What information do we collect?

Personal data, or personal information, means information relating to an identified or identifiable living individual. It does not include data where the identity has been removed (anonymous data) and it would not be possible to identify an individual from this anonymous data.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, this includes but is not limited to any change of address, contact details, name, names of insured persons, gender, marital status and vehicle details. Please note: It is a legal requirement under the terms of your insurance policy to ensure your data is accurate and current, failure to do so may invalidate your policy.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (to arrange insurance on your behalf).

In order to provide insurance quotes, insurance policies and deal with any claims or complaints, we need to collect and process personal data about you. We may collect, use, store and transfer different kinds of personal data about you including:-

1. General information including full name, postal and email address, date of birth, gender, contact telephone numbers, marital status, nationality, employment details and family member details.
2. Identification details including identification numbers issued by government bodies or agencies including your national insurance number, passport number, driving licence number and photographs which identify you.
3. Information about what or who you are asking to be insured, including vehicle details, named drivers* or your home.
4. Previous incidents and claims. We will ask you for details of any previous or current incidents or claims which might include information relating to your health and injuries you suffered and information relating to the outcome of these incidents and claims.
5. Criminal conviction data.
6. Financial information including your bank account and card details.
7. Special categories of personal data including information about your health, sexual orientation, racial or ethnic origin.
8. IP address, which is a unique number identifying your computer.
9. Information collected from the use of our website and/or customer portal. This will include information to identify your browser, device, network you are using, IP address and to analyse use of the website and portal. We use cookies to enhance the online experience and you will find more information on our use of cookies in our cookie policy which is displayed on our website.

* Please note: Where you have named driver(s) on your insurance or are requesting a quotation including named driver(s) the information we may need to collect on the named driver(s) may be identical to the type of information we have collected from you, you must ensure you have the legal right to provide such information. We reserve the right to contact any named driver to verify the information you have given us is accurate and correct and they are happy for us to hold and process their information.

We also obtain information about you from these sources:

1. The insurance broker intermediary or other introductory service.
2. Someone connected to you as part of a quotation for insurance or a claim, providing we have consent to do so or have legitimate legal grounds for doing so.
3. Your previous insurer to confirm a no claims discount.
4. Credit reference agencies to confirm your identity, assess the insurance risk, check your credit history and to prevent fraud. We will obtain this information at the point you request a quote from us, when you renew a policy and if you request any changes to your policy. A credit reference agency check will be recorded on your credit report, under Somerset Bridge Limited, whether your application proceeds or not, but it won't harm or adversely affect your credit profile. You can find more information on the Credit Reference Agency Information Notice via this link www.experian.co.uk/crain.
5. Publicly available information including the electoral register, county court judgments, bankruptcy and social media and networking sites.

6. Third party databases available to the insurance industry including but not limited to anti-fraud databases, (the Insurance Fraud Bureau, Featurespace, Synectic Solutions, Iovation, GB Trace, Hunter, CUE), the DVLA and government agencies.

How we use your information

The information we collect will be used for the purposes of risk assessment, insurance administration including quotation, inception and renewals, fraud prevention, financial sanctions checking, payment collection, claims handling and statistical analysis to ensure the products we offer are in-line with market needs and demands.

We use your information for the duration of the insurance policy term and after the end of the policy in line with our retention period to comply with our legal and regulatory obligations and where necessary to support our legitimate interests in managing our business, including the administration of your policy, improving our products and services, preventing and detecting crime, general risk modelling, transferring books of business, obtaining re-insurance, company sales and re-organisation. This will apply to all individual drivers covered by the policy.

If you have a telematics unit, we will use the unit to capture date, time, speed, location and other associated vehicle and driving related information from your vehicle. This information includes date, time, latitude, longitude, speed, duration, distance, acceleration, braking, cornering, other associated vehicle information. Our telematics systems normally collect information while your vehicle is being used and transmit this to us and/or our suppliers after a delay. Instances where the telematics systems may send real time data and alerts to us include where a collision or crash is detected, if the device's tamper alerts are activated, or if it is at your request, for example if your vehicle has been stolen and a theft tracking service has been activated.

We record and monitor telephone calls for training purposes, quality control and to prevent and detect fraud. We also use CCTV recording equipment in and around our premises for monitoring and security. If you are involved in an incident or claim we will collect information, including CCTV, dashcam footage or images where relevant, from anyone else involved as necessary, e.g. the claimant, witnesses or the police. If you are claiming under another person's policy as a third-party claimant, we collect information about you when you make a claim under the insurance policy. If you are a witness to an event giving rise to a claim, we collect your information to help us handle the claim. We only collect information that is relevant and necessary for us to handle claims made under the insurance policy.

The legal basis for processing your personal information

We will only use your personal information when the law allows us to, or where you have provided specific and explicit consent. Most commonly we use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you. This includes using your data for providing quotations, policy administration, claims processing and renewals, including renewal invitations.
- Where it is necessary for our legitimate interests, provided your interests and fundamental rights do not override those interests. This includes the administration of your policy, improving our products and services, preventing and detecting crime, general risk modelling, research and statistical analysis.
- Where we need to comply with a legal obligation, including sharing information with regulators.
- Where you have given us consent to process your personal information.

We process your special category data (which is more sensitive, such as your health or sexual orientation data) in the following circumstances:

- Where you have given us your explicit consent.
- The processing is necessary for the establishment, exercise or defence of legal claims.
- The processing is necessary for reasons of substantial public interest.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact the Data Protection Officer if you need details of the specific legal ground we are relying on to process your personal data.

Marketing

We will provide you with choices regarding certain personal data uses, particularly around marketing material.

You can ask us to stop sending you marketing messages at any time by following the opt out links on any marketing message sent to you or by contacting us at any time, by post, telephone, email or such other means available.

Who will we share your information with?

Where necessary, we will share your information with:

- Other companies or brands within our group of companies and the insurer group or where we provide insurance services in partnership with them.
- Somerset Bridge Shared Services Limited, a group company which provides a range of group operational support services to Somerset Bridge Limited, including HR, IT, legal, management information, marketing, finance, risk and compliance advice and assistance.
- Insurers, re-insurers, business partners, agents, carefully appointed third parties providing a service to us on our behalf, including processing our post and mail, merchant banking facilities, and administrative services.
- Third party databases available to the insurance industry including anti-fraud databases, the DVLA and government agencies.
- With the Insurer's reinsurer, who provide reinsurance services to the Insurer. Reinsurers will process your data to decide whether to provide reinsurance cover, assess and deal with reinsurance claims and to meet legal obligations. The reinsurer will also be a controller of your data*
- Third party databases available to the insurance industry to carry out background checks or assist with your claims, including but not limited to anti-fraud databases, (the Insurance Fraud Bureau, Featurespace, Synectic Solutions, Iovation, GB Trace, Hunter, Connexus), Experian, Lexis Nexis, the DVLA and government agencies
- Legal, financial, medical and other professional advisors.
- If you buy an optional add on to your policy, we will share the information with the provider of the product (for example windscreen protection, legal expenses insurance).*
- Third parties we use to recover money you may owe us (debt collection).
- Other companies when we are trialling their products and services which we consider may improve our services to you and our business processes.
- Other insurers or representatives of the insurer (for example claims handlers, loss adjusters, solicitors).
- Legal, financial, medical and other professional advisors.
- Other organisations that have a specific role in law such as statutory or regulatory bodies.
- Other organisations where we have a duty or are permitted to disclose your personal information by law (for example if we receive a valid request from an official organisation in the interests of preventing or detecting crime).

- Other third parties or individuals if you have given us permission to do so or if they are acting on your behalf.
- Another company if our business or part of it is bought or taken over by that company or during confidential discussions about a sale or take over. We will ensure the information is protected by confidentiality agreements.
- We check your details with credit reference agencies.
- We will provide sales information to third parties such as price comparison websites which you might have used to buy your policy so we can fulfil our contractual obligations with them.
- When we are notified of an incident or claim we will share the information with relevant agencies and appropriate service providers, we keep this information updated as the claim progresses and is settled. This includes details of any persons involved in the incident or claim.

Unless we are required to disclose your information by law, we will not share your personal data without safeguards being in place. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We have contracts in place with our third party data processors which means that they are unable to do anything with your personal information unless we have instructed them to do it.

* You should familiarise yourself with their privacy notice and data sharing arrangements as this may differ from this privacy notice.

Financial Crime & other fraud prevention and detection

To prevent and detect fraud, we will check your information against publicly available sources (such as social media and networking sites and the open electoral register), with fraud prevention agencies and databases. If you would like information about the databases we use, please contact the Data Protection Officer using the details provided in this notice.

We have a regulatory requirement to put in place systems and controls to manage the risk of financial crime, including compliance with the UK's financial sanctions regime. We screen your details against the HM Treasury List.

If you give us false or inaccurate information and/or we suspect fraud, we will record this. If fraud is identified or suspected, we will pass details to fraud prevention agencies. Law enforcement agencies and other organisations may access and use this information to detect and prevent fraud, for example when checking details on applications for credit, managing credit accounts, checking details on proposals and claims for insurance, completing credit searches.

We share information to update other organisations and industry databases, this includes the Claims and Underwriting Exchange Register and databases, the Motor Insurance Anti-Fraud and Theft Register. We will pass information relating to your insurance policy and incident to the operators of these registers, their agents and suppliers.

Motor policy information will be added to the Motor Insurance Database (MID) managed by the Motor Insurers' Bureau. This may be used by other statutory and authorised bodies. If you are involved in an accident in the UK or abroad, the MID will be searched to obtain policy information. You can find more information at <https://www.mib.org.uk/media/417718/article-14-wording-ncd.pdf>

Automated decision making

In certain circumstances, we are permitted to carry out automated decision making, which is the process of reaching a decision by automated means and without any human involvement. We are permitted to do this when the decision is necessary for entering into, or performance of, a contract, when the decision is

authorised by law or based on your explicit consent. We assess your application for insurance, any changes to a policy and renewal of your policy by using automated processes. This involves checking the information you have provided, analysing the claims you may make, ability to pay the insurance premium and risk of fraud. This involves the use of systems to reach a decision whether we can provide a quote for insurance and the price. Where we base a decision on solely automated decision making, you are entitled to request the decision is reviewed and to contest the decision.

We carry out statistical analysis and modelling both during the policy term and afterwards during our retention period for your data. This will apply to all individual drivers covered by the policy. We will use the information you give us, together with information collected from databases we use. This helps us to understand and predict our customers or future customers' behaviour and preferences which then helps us to improve our products and services. The information will be used for research and statistical analysis to improve the pricing of products and services. We may anonymise and/or combine the information you have given us to understand more about you and to create new products and services. This may also extend to trialling new products that become available in the market to help enhance our modelling and pricing process and may include contracting third parties to help us with this process.

Profiling will also be used to enhance our understanding of you and help with our pricing and any future pricing models we develop. This may include contracting third parties to help us with this process. We may also look at behavioural and/or technical personal information. For example, this information may include details about how you browse our website and the devices and technology you use to browse our website. You have the right to object to any profiling that we carry out. If you wish to rely on this right, please contact the Data Protection Officer via the contact details above.

International transfers

We and our appointed third party service providers may transfer and process personal information outside the European Economic Area. To protect your personal information transfers are subject to data safeguards, to ensure compliance with data protection laws. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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 and/or unlawful way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data 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. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you, which includes third party claims.

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

You have a number of rights under data protection laws in relation to your personal data. The rights available to you depend on our reason for processing your information.

- Right of access. You have the right to ask us for copies of your personal information, this is known as a Subject Access Request (SAR). 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 for us to 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 above, to enable us to process your request as expediently as possible please supply your name, address, date of birth and what information you are seeking. We may ask you to provide further evidence to prove your identity to ensure we are complying with the legal requirements to process your request.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive and we will inform you of the fee and seek your acceptance of it prior to complying with your request. Alternatively, we could refuse to comply with your request, in part or completely depending on the nature of your request, in these circumstances and we will advise you of the grounds for the refusal or partial refusal.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you as soon as possible and in any event during the one month period and keep you updated as necessary until we have formally responded to your request.

Complaints

If you have any queries or concerns about this notice or your personal data, please contact us at dpo@somersetbridgelimited.co.uk or via the postal address above, marked for the attention of the Data Protection Officer.

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 using the following contact details:-

England	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire, SK9 5AF Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate) Email: casework@ico.org.uk
Scotland	Information Commissioner's Office 45 Melville Street Edinburgh, EH3 7HI Phone: 0303 123 1115 Email: scotland@ico.org.uk
Wales	Information Commissioner's Office 2nd Floor Churchill House Churchill way Cardiff, CF10 2HH Phone: 029 2067 8400 Email: wales@ico.org.uk
Northern Ireland	Information Commissioner's Office 3rd Floor 14 Cromac Place Belfast, BT7 2JB Phone: 0303 123 1114 (local rate) or 028 9027 8757 (national rate) Email: ni@ico.org.uk