

## Privacy Notice

### Looking after your information

The General Data Protection Regulation requires County Insurance Services Limited to manage personal information in accordance with the Data Protection Principles. In particular, our company is required to process your personal information fairly and lawfully. This means that you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us in order that we may provide the product or service that you require. All our employees are personally responsible for maintaining customer confidentiality. We provide training and education to all employees to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

### Who we are

Your information will be held by County Insurance Services Limited.

### Where we obtain your information

Your personal information will be held securely in County Insurance Services Limited systems so that we, either now or in the future, can manage your relationship with us. This will include information you provide when you apply to us, and any additional information provided by you or others in various ways, including:

- (a) in applications, emails and letters, during telephone calls and conversations in office, when registering for services, in customer surveys, when using County Insurance Services Limited company web- sites, and during insurance reviews and interviews.
- (b) from analysis (for example, the amount frequency, location, origin, and recipient) of your payments and other transactions, and from operating your account (including the creation of profiles used to uniquely identify you when you use our online, mobile and telephony services) which are used to help us combat fraud and other illegal activity; and
- (c) information County Insurance Services Limited receive from or through other organisations (for example credit reference agencies, insurance companies, social networks, and fraud prevention agencies) whether in the course of providing products and services to you or otherwise, and from information we gather from your use of and interaction with our internet services and the devices you use to access them.

We will not retain your personal information for longer than is necessary for legal or regulatory requirements.

### How we share your information

We may share the personal information we hold about you across the County Insurance Services Limited for the following administrative activities:

- (a) providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;
- (b) responding to your enquiries and complaints;
- (c) undertaking insurance reviews;
- (d) facilitating the secure access to online platforms;

and also for the following data sharing activities:

- (e) updating, consolidating, and improving the accuracy of our records;
- (f) undertaking transactional analysis;

- (g) arrears and debt recovery activities;
- (h) testing new systems and checking upgrades to existing systems;
- (i) crime detection, prevention, and prosecution;
- (j) evaluating the effectiveness of marketing, and for market research and training;
- (k) customer modelling, statistical and trend analysis, with the aim of developing and improving products and services;
- (l) assessing insurance risks across the County Insurance Services Limited;
- (m) managing your relationship with the County Insurance Services Limited companies.

By sharing this information it enables us, to better understand your needs and run your accounts in the efficient way that you expect.

Your data may also be used for other purposes for which you give your specific permission, or, in very limited circumstances, when required by law or where permitted under the terms of the General Data Protection Regulation.

### **When we may share your information**

We will treat your personal information as private and confidential, but may share it with each other and disclose it outside County Insurance Services Limited if:

- (a) allowed by this agreement;
- (b) you consent;
- (c) needed by our agents, advisers or others involved in running policies and services for you or collecting what you owe us;
- (d) needed by subcontractors to help us manage your records;
- (e) HM Revenue & Customs or other authorities require it;
- (f) the law, regulatory bodies, or the public interest permits or requires it;
- (g) required by us or others to investigate or prevent crime;
- (h) needed by market research companies to assist us in providing better products and services for you;
- (i) needed by any other parties connected with your policies;
- (j) required as part of our duty to protect your policies, for example we are required to disclose your information to the UK Financial Services Compensation Scheme (FSCS);
- (k) needed for the purpose of insurance administration by the insurer and its reinsurer.

We will always ensure your information remains safe and secure.

### **Using your information to help prevent terrorism and crime**

The Government also requires us to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result of this we may need to disclose information to government bodies.

### **Sharing your information to assist with asset buying**

County Insurance Services Limited may in the future wish to sell, transfer or merge part or all of their business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it. If so, they may disclose your personal information to a potential buyer, transferee, or merger partner or seller and their advisers so long as they agree to keep it confidential and to use it only to consider the possible transaction. If the transaction goes ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this notice.

### **Searching insurance records**

When you apply to us for insurance, we will pass your details to the insurer. If you make a claim, any information you give to us, or to the insurer, may be put onto a register of claims and shared with other insurers to prevent fraudulent claims. A list of the participants is available from the insurer. We may also

disclose your information within our group of companies, to our agents and other insurers to investigate or prevent fraud.

## **Joint Applicants**

If you give personal information about someone else (such as a joint applicant) then you should not do so without their permission. Where information is provided by you about someone else, or someone discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this privacy notice.

## **Sharing personal information between joint applicants**

Sometimes, when you take out a policy or product, this may mean that your personal data will be shared with the other applicant. For example, transactions made by you will be seen by your joint account holder and vice versa.

## **How we manage sensitive personal information**

The Data Protection Act & its successor, General Data Protection Regulation defines certain information as 'sensitive' (racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences). If you apply to us for insurance, we may ask you for some 'sensitive' details. We will only use this information to provide the service you require and we will ask for your explicit consent. As a customer, there may be times when you give us sensitive information. We will share it with insurers to keep your records up to date.

## **Using credit scoring**

When you apply for credit, an automated system known as credit scoring may be used when considering whether to agree the borrowing. It is a method of assessing your likely conduct of an account based on a range of data, including the conduct of previous similar accounts. It is a system widely used by credit providers to help make fair and informed decisions on lending. Credit scoring takes account of information from three sources - the information you provide on your application, information provided by credit reference agencies and information that may already be held about you by companies within County Insurance Services Limited. A credit scoring system will consider information from these sources, to make an overall assessment of your application.

The credit scoring methods used are regularly tested to ensure they remain fair, effective and unbiased. Using a credit scoring system helps us to lend responsibly. If you submit an application and it is declined through this automated process, you can contact us within 21 days to have the decision reconsidered. You also have the right to ask that the decision is not made based solely using a credit scoring system.

## **How we use Credit Reference Agencies**

Credit Reference Agencies (CRAs) collect and maintain information about consumers' and businesses' credit behaviour. This includes Electoral Register, fraud prevention, and credit information - including details of previous applications and the conduct of your accounts - and public information such as County Court Judgements, decrees, and bankruptcies.

The information that County Insurance Services Limited and other organisations provide to credit reference agencies about you, your financial associates and your business (if you have one) may be provided to other organisations and used by them and us to:

- (a) help make decisions, for example when:
  - (i) checking details on applications for credit and credit-related or other facilities;
  - (ii) managing credit and credit-related accounts or facilities;
  - (iii) recovering debt;
  - (iv) checking details on proposals and claims for all types of insurance;
  - (v) checking details of job applicants and employees;
- (b) detect and prevent crime, fraud and money laundering;
- (c) check your credit history;

- (d) verify your identity if you, or someone financially linked with you, applies for services;
- (e) trace your whereabouts;
- (f) undertake research, statistical analysis and systems testing.

If County Insurance Services Limited needs to make a credit decision when you apply for a credit-based product or service (e.g. paying for insurance policies on a monthly basis) or to review the amount of credit it provides under an existing agreement, your records will be searched, along with those of anyone who is financially associated with you such as your spouse or partner. The CRA will keep a record of this search and place a "footprint" on your credit file, whether or not the application proceeds.

We may give details of your account and how you conduct it to credit reference agencies, including if you borrow and do not repay in full and on time. If you fall behind with your payments and a full payment or satisfactory proposals are not received within 28 days of a formal demand being issued, then a default notice may be recorded with the CRAs. Any records shared with CRAs will remain on file for 6 years after your account is closed, whether it has been settled by you or as a result of a default. Other organisations may see these searches and updates if you apply for credit in the future, and these may affect your ability to borrow from other lenders.

If you apply for or hold an account in joint names, or tell us that you have a spouse or financial associate, a financial association will be created between your records, including any previous and subsequent names used by you. This means that your financial affairs may be treated as affecting each other. These links will remain on your and their files until such time as you or your partner is successful in applying for a disassociation with the CRAs to break that link. You must be sure that you have their agreement to disclose information about them. Searches may be made on all joint applicants, and search footprints will be left on all applicants' records.

You have a right to apply to the credit reference agencies for a copy of your file. Details of how you have run your account(s) may be disclosed to all the credit reference agencies. The information they hold may not be the same and there is a small fee that you may need to pay to each agency to which you apply.

### **Using Fraud Prevention Agencies**

We have systems that protect our customers and ourselves against fraud and other crime. Customer information can be used to prevent crime and trace those responsible. We will share your personal information from your application with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details of this fraud will be passed to these agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities.
- Managing credit and credit related accounts or facilities.
- Recovering debt.
- Checking details on proposals and claims for all types of insurance.
- Checking details of job applicants and employees.

We may access and use information recorded by other countries' fraud prevention agencies.

### **How we check your identity**

We may ask you to provide physical forms of identity verification when you take out an insurance policy. Alternatively, we may search credit reference agency files in assessing your application. The agency also gives us other details and information from the Electoral Register to verify your identity. The agency keeps a record of our search, whether or not your application proceeds. Our search is not seen or used by lenders to assess your ability to obtain credit.

### **Undertaking Anti-Money Laundering checks**

To comply with money laundering regulations, there are times when we need to confirm (or reconfirm) the name and address of our customers. This information may be shared with other group companies.

## **Using your details for service contact**

Making sure we deliver excellent customer service is very important to us and to do this various methods of communication may be used when sending you information about your account. Most of the time you will be contacted by letter, telephone or email. You can ask us to stop sending these messages at any time. If we decide to use email to contact you, we will only do this if we have ensured that using email will not put your information at risk, or, if you have requested we email you, that we have explained the risks of sending an "insecure" email and that you are happy to accept that risk.

## **Recording phone calls**

We may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

## **Using information on social networking sites**

As part of our ongoing commitment to understanding our customers better, we may research comments and opinions made public on social networking sites such as Twitter and Facebook.

## **Obtaining a copy of your information**

Under the General Data Protection Regulation you have the right of access to your personal data. If anything is inaccurate or incorrect, please let us know and we will correct it. For further details on how to request a copy of your information, please contact County Insurance Services Limited, County House, Glyme Court, Kidlington OX5 1LQ.

## **Individual Rights**

- **Erasure:** in certain circumstances you will have the right to ask us to erase information we hold about you. We are not required to erase information if we still need it for the purposes for which it was collected or processed, including to maintain records after cancellation or expiry of your policy, or where we have other legal grounds for processing your information.
- **Restrict processing:** where you do not wish your information to be erased, you may instead have the right to ask us to restrict our processing of your information. This right is only available in limited circumstances, such as where you believe the information, we hold about you is inaccurate or is being processed improperly. The right would apply during the period that we are checking its accuracy or legality.
- **Portability:** to receive a copy of the personal data you have provided to us, in a commonly used machine-readable format, and to transfer that personal data to another data controller. Where it is technically feasible you may also have the right to request us to transfer the data directly to another data controller.
- **Object:** where we are processing your information on the grounds of it being in our legitimate interests to do so, you have the right to object to that processing.
- **Automated decision making and profiling:** where we use automated processing to make a decision which may produce a legal or similarly significant effect on you, you may request human intervention, express your point of view and contested decision.

In order to exercise these rights, please write to the Data Protection Officer at County Insurance Services Limited, County House, Glyme Court, Kidlington OX5 1LQ.

## **Using your personal information to contact you about products and services**

Unless you have asked us not to, we may contact you by mail, telephone, email or text message about products and services available which we believe may be of interest to you or benefit you financially.

We promise not to contact you about everything - only if we think it could be appropriate and relevant to you. This contact may continue after your relationship with us ends. You may opt out of receiving this

information at any time by calling or writing to us.

### **Using cookies**

In general, you can visit County Insurance Services Limited websites without identifying who you are or revealing any information about yourself. However, cookies are used to store small amounts of information on your computer, which allows certain information from your web browser to be collected. Cookies are widely used on the internet and do not identify the individual using the computer, just the computer being used. Cookies and other similar technology make it easier for you to log on to and use our websites during future visits.

### **Data retention**

We retain data for as long as necessary for the performance of a contract or to take steps to enter into a contract.

### **Changes to Privacy Notice**

We keep our privacy notice under regular review and we will reflect any updates within this notice.