

Circle Insurance Services Ltd – Privacy Policy

Circle insurance Services Ltd including its subsidiaries and trading styles (hereafter referred to as Circle) understand the information you trust us with is important to you, we are committed to protecting and respecting your privacy.

Our Privacy Policy explains how, when and why we collect your personal information during the course of providing services to you, under what circumstances we may disclose your personal information within our Group of Companies and to others, and how we keep it secure.

- We only collect personal information about you where it is completely necessary or you have consented, and we ensure that we only collect information that we need.
- We will not send you marketing material unless you have given us permission to do so.
- We will not sell your personal information to third parties.
- We use third party suppliers to help us provide a service to you. Where we share personal information with those suppliers, we have the appropriate contracts or controls in place, which will assess the security of their processing arrangements.
- We will protect your personal information with an appropriate combination of technical and organisational measures.
- We record and monitor our communications with you to protect you and us, for the reasons listed in Section 3.
- You have rights to your information. These are detailed in Section 10
- We will endeavour to keep your personal information only for as long as we have to.
- If you have a complaint, please see how to contact us in Section 12
- If you have any questions about how we process your information, please see how to contact us in Section 14.

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1. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We need information about you to create your policy, service your policy and to offer our range of services. We need to collect information from you to do this and to offer you the right product for your circumstances.

This can include personal information about you and other people you may want included on a policy, information that we collect automatically, and personal information we collect from other sources.

The information we collect will include:

- Name (s)
- Contact details (postal address, email address, telephone numbers)
- Date of birth
- Banking, credit/debit card details.

Where necessary, we may also collect the following information:

- Country of birth/citizenship/nationality/country of residence
- Gender
- Marital status
- Information about family/household/dependants
- Criminal convictions
- Health information
- Medical history
- Claims history
- Vehicle ownership
- Asset ownership
- Employment status
- Financial status including CCJs and declarations of bankruptcy
- Previous Claims

In addition to the above, we may also collect information specifically for the following insurance products and services:

Motor

A Motor policy requires us to collect the personal information listed and further information about you and anyone to be covered by the policy or authorised to act on your behalf. This includes the type of license you hold and for how long you have held it, any penalty points or motoring offences, any medical conditions which must

be declared to the DVLA (or equivalent body e.g. DVLNI) and previous claims. We need this information to effectively price your premiums.

Personal

A Personal policy requires us to collect the personal information listed and additional information about you and any other people to be covered by the policy, such as information about your lifestyles and employment status, your home and any assets to be insured.

Commercial

A Commercial policy requires us to collect some of the personal information listed and additional information about the company's directors and employees, as well as business contact details. If your business is under your name and located at your home address, naturally the information we collect will be personal to you.

Life

A Life product requires us to collect the personal information listed and additional information about you and any other people to be covered by the product. This may include information about your family, your financial preferences, salary, tax and pension details.

Risk Management Services

Our health and safety consultancy and loss control surveys require us to collect some of the personal information listed as well as information about the property or business being assessed.

2. WHY WE USE THE INFORMATION ABOUT YOU?

We collect your personal information for a number of reasons: so we can provide you with a quote, administer your policies, handle claims, protect us and you from fraud, improve the products and services we offer, and inform you of other products you may be interested in.

To process your information, we rely mainly on the following legal bases:

Performance of a contract: The use of your information is necessary to perform the contract that you, or a person covered on the policy, has with us.

Legitimate interests: We may use your information for our legitimate interests, such as to provide you with the most suitable policy, website experience, emails or newsletters, or to improve and promote our products and services, along with administrative, fraud prevention and detection and legal purposes.

Consent: We may rely on your consent to use your personal information for certain products or to assist in a claim, and also for marketing purposes. You may withdraw your consent at any time, by contacting us at the address provided at the end of this Privacy Policy.

3. HOW WILL WE USE THE INFORMATION ABOUT YOU?

We use the personal information we collect for several reasons. These include:

- To give an appropriate assessment of the risk you're hoping to have insured. We evaluate the risk and exposures of potential customers and then use the personal information collected to set-up your policy and decide how much cover you should need or receive.
- To give you advice or guidance.
- To service your policy and any claims you make
- Where necessary, we'll use your information to verify your identity or those transacting on the policy.
- For fraud and financial crime prevention and detection, and for legal purposes where we may need to use your information to investigate or respond to legal disputes, regulatory investigations or for compliance purposes.
- We may also use your personal information to ensure we comply with legal and regulatory requirements. This includes internal audits, monitoring and assurance activities to examine and evaluate the systems and controls within Circle Insurance Services Ltd .
- We may use your information to contact you, if we need to tell you there is an error or change in your policy
- We use credit reference agencies, to help us decide whether to offer insurance policies or services to potential customers. For more details, see Section 5
- We sometimes ask our customers to take part in market research

4. INFORMATION THAT WE SHARE

We may have to share your information with other companies in the Group or to categories of third party service providers, including insurance partner, in certain circumstances:

- Where we need to share the risk with other insurers, we will share the necessary data you have given us with our carefully selected partners
- To enable our corporate customers to understand the volumes and types of claims made against their insurance policies, we may share information relating to your claim against such a policy with these organisations, or brokers acting on their behalf
- Where we need to service your policy and handle a claim against it third party lawyers, loss adjusters, fraud specialists, subject matter experts and repairers where appropriate will be involved
- Where required by law, we will share your information with third parties such as law enforcement agencies and regulatory or Government bodies. Failing to do so could result in fines or sanctions for Circle
- There are some instances where we need to share your information with third parties to help us detect and prevent criminal or fraudulent activities

- Where fulfilling our contractual obligations to you requires it, we will share your information with third parties.
- We will share your information with third party IT providers who support us in hosting, transferring, processing, testing and problem resolving. This enables us to provide you the services and products you need. We may also share information with third party audit companies providing expertise and assurance over our processes and controls
- We may also share your information with third party organisations who help us to research and analyse our product and service offerings, so that we can continue to provide you with the best possible service. You may opt out of this by contacting us using the details provided at the end of this Policy

Motor – In addition to those listed above, a Motor policy may require the following categories of suppliers for handling a claim:

- Loss Adjusters
- Lawyers and legal cost negotiators
- Special investigators
- Breakdown and recovery companies
- Hire car providers
- Vehicle repairers
- Engineers
- Windscreen repair companies
- Salvage companies
- Rehabilitation specialists and medical professionals

Personal – In addition to those listed above, a Personal policy may require the following categories of suppliers for handling a claim:

- Loss Adjusters
- Lawyers and legal cost negotiators
- Special investigators
- Buildings repair contractors
- Contents replacement companies
- Home emergency companies and out of hours and overseas emergency claims helplines
- Disaster restoration experts
- Vets and appropriate specialists
- Rehabilitation specialists and medical professionals

Commercial – In addition to those listed above, a Commercial policy may require the following categories of suppliers for handling a claim:

- Loss Adjusters
- Lawyers and legal cost negotiators
- Special investigators
- Out of Hours and Overseas emergency claims helplines
- Breakdown and recovery companies
- Hire car providers
- Engineers

- Windscreen repair companies
- Salvage companies
- Disaster restoration experts
- Rehabilitation specialists and medical professionals

Life – In addition to those listed above, a Life policy may require the following categories of suppliers for handling a claim:

- Lawyers
- Reinsurers
- Medical professionals
- Banks

5. CREDIT REFERENCE AGENCIES

A credit reference agency (CRA) is an independent organisation that assists insurance companies in deciding whether to offer insurance policies to potential customers, based on information gathered about them from public sources and from major lending companies.

6. MARKETING

We would like to send you information about our products and services and other companies in our Group which may be of interest to you. We will collect your information for marketing purposes, if you agree, when you obtain a quote, take out a policy with us, enter into a competition or provide your personal information through our websites. We may also purchase your data from third-party providers.

To ensure that we keep our marketing communications relevant and useful to you, we will share your data with carefully selected third party marketing analytics organisations for customer profiling.

If you enter one of our competitions, we will collect your information in order to randomly select a winner and send out their prize.

To stop us contacting you for marketing write to Marketing Department Circle Insurance Services Ltd ,118 Holyhead Road, Coventry CV1 3LY or talk to your local office or usual contact.

7. INFORMATION SECURITY

We work hard to keep your data safe. We use an appropriate combination of technical and organisational measures to ensure, as far as reasonably possible, the confidentiality, integrity and availability of your information at all times. If you have a security-related concern, please contact us using the details provided at the end of this Policy.

8. TRANSFERRING YOUR INFORMATION OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)

In order to provide our services, the information you give us may be transferred to countries outside the European Economic Area (EEA). These countries may not have similar data protection laws to the UK. When we do transfer your personal data outside of the EEA, we ensure that any party with access to your information has implemented the necessary security and privacy measures to ensure that your personal data is kept secure and confidential as outlined in this Policy.

9. INFORMATION WE COLLECT THROUGH YOUR USE OF OUR WEBSITES

We operate a number of Circle websites most of which use cookies, where we do not store personal information such as your name, address, phone number or email in a format that can be read by others. The cookies we use cannot read or search your computer, smartphone or web-enabled device to obtain information about you or your family, or read any material kept on your hard drive.

We collect information through the use of cookies and similar technologies, to enable us to remember you when you visit our websites and to improve your online experience.

To find out more about our use of cookies and related technologies, please read our Cookie Policy on our website.

10. YOUR INDIVIDUAL RIGHTS

You have a number of rights with regards to the personal information that we hold about you, which you will have provided as part of taking up a quote or service with us.

Right of Access – You have the right to request a copy of the information that we hold about you. We will provide you with this information within one month of receiving your request and verifying your identity. If the request is complex, we may extend the response time. We will inform you if this is the case and explain why.

Right to Rectification – We want to make sure that your personal information is accurate and up to date. You may ask us to correct, update or remove information you think is inaccurate or incomplete, and we ask that you inform us promptly of any changes to your circumstances.

Right to Erasure – You may also ask us to erase your personal information from our systems, in certain circumstances. There are some specific circumstances where the right to erasure does not apply and we are permitted to hold your data. We will explain the reason for this at the time, should this occur.

Right to Data Portability – You may also ask us to move, or ‘port’, your personal information to another organisation electronically. We will only port personal information you have provided to us, that we have processed based on your consent or performance of a contract, or that has been processed automatically. We will port your personal information without charge and within one month, where technically feasible.

Right to Restricting processing – You have a right to request that we restrict the processing of your personal data in certain circumstances. We will inform our third parties to whom we have disclosed your personal data that they must also restrict processing. We will inform you when the restriction on processing your personal data ends.

If you would like to exercise these rights, please write to us, using the details provided at the end of this Privacy Policy, outlining your specific request.

11. RETAINING YOUR DATA

Circle, and the information we collect about you, are subject to various regulatory and legislative requirements. In addition, we will endeavour not to keep your personal information for longer than we have to for us to fulfil our obligations to you. Where it is not possible for us to delete your data, we will ensure the appropriate security and organisational measures are put in place to protect the use of your information.

12. COMPLAINTS

We work hard to ensure that your personal information is treated safely and securely. However, if you have a complaint, write to us using the details provided at the end of this Policy. You also have the right to complain to the Information Commissioner’s Office.

13. CHANGES TO OUR PRIVACY POLICY

We review our privacy policy regularly and will place any updates on our website and in relevant policy communications.

14. WHO TO CONTACT IN RELATION TO PROCESSING OF PERSONAL INFORMATION

Circle controls the processing of personal data on its systems. If you would like to discuss anything in relation to this policy or how we handle your personal information, you can reach the Data Controller at Circle by writing to: The Data Controller Officer, Circle Insurance Services Ltd 118 Holyhead Road Coventry CV1 3LY or email insurance@circlegroup.co.uk