

## **Europa Group Privacy Policy**

The privacy and security of your personal information is very important to us (Ingenie Services, a trading name of Europa Group Limited). This policy explains how we collect and use your personal information. Please read it carefully.

This Privacy Policy forms part of the Terms and Conditions of the website.

If you have any questions about the use of your personal information, please contact our Data Protection Officer at: Europa House, Midland Way, Thornbury, Bristol, BS35 2JX or by e-mailing [compliance@europa-group.co.uk](mailto:compliance@europa-group.co.uk)

### **What information do we collect?**

We'll ask you to share your personal information with us so we can provide our services to you and to manage these services. The information we collect may include for example:

- General information about you including your name, address, date of birth and contact details
- What and who you want to insure, such as vehicle and named driver details
- Your claims history
- Your credit history
- Bank account and debit/credit card details
- Sensitive personal information such as details regarding your health, or any convictions
- Details about your use of our website such as your Internet Protocol (IP) address (a number which identifies your device)

### **Where do we collect information from?**

- You or someone connected to you as part of an insurance quotation
- Price comparison websites if you've received a quote for a policy with us. The information in this notice will apply in addition to any information given to you by the price comparison website about the use of your personal information.
- Third party databases made available to the insurance industry

If you provide us with information about another person, you confirm that they have agreed for you to act for them, to consent to the processing of their personal information and that you have informed them of our identity and the purposes for which their personal information will be processed.

### **Why do we collect this information and how will we use it?**

Our legal grounds for processing your personal information is that it is necessary for the performance of your insurance policy and to fulfil our legitimate interests. We may collect and use your personal information:

- a) To provide you services relating to an insurance quotation and/or insurance policy such as:
  - o Assessing your insurance application and arranging your motor policy
  - o Managing your motor policy including issuing policy documents

The collection and use of information such as your name, address, what/who you would like to insure and any claims or motoring conviction details is necessary to provide you with an insurance quotation. Without this information we will be unable to assess your application. This assessment

involves an automated decision to determine whether we can provide a quotation from our panel of insurers. These decisions involve the use of pricing and acceptability tools and are dependent on the information that you provide us. If you object to an automated decision then we'll be unable to provide you with an insurance quotation or renewal.

- b) Where our reasons are justifiable including:
- Keeping records about you and our correspondence with you so we can manage our relationship with you as well as satisfy any record-keeping legal and regulatory obligations we may have
  - Fraud prevention and detection – we may at any time pass your personal information to internal and external data validation and fraud prevention systems. This may include a claims verification system. Your details may also be checked against records held by external fraud prevention agencies. If you give us false or inaccurate information or we suspect or detect fraud, we will record this and share it with other insurers and fraud prevention agencies. Law enforcement agencies may access and use this information to help prevent and detect crime. We and other organisations may also use this information to prevent fraud and money laundering for example when:
    - Checking details on applications for credit or credit related facilities
    - Managing credit and other credit related facilities
    - Recovering debt
    - Checking details on proposals and claims for all types of insurance
    - Checking details of job applicants and employees

We and other organisations may offer access to this information to agencies in other countries to help prevent global fraud.

- Sharing your personal information with the Motor Insurance Database (MID) managed by the Motor Insurers' Bureau which may be used to establish whether a driver is insured to drive a vehicle and/or for preventing or detecting crime. If you're involved in an accident in the UK or abroad the MID may be searched to obtain relevant policy information.
- Carrying out processes such as statistical analysis to help improve the products and services we offer.
- Recording and monitoring calls for training purposes to improve the quality of our service and to help us deal with queries or complaints from you.

### **How we communicate with you about our similar products and services**

We'll contact you to communicate our products and services to you which we believe may be of interest to you. We may communicate with you by e-mail, telephone, post or SMS unless you've told us you don't want us to. Where you no longer hold a policy with us or we've provided you with a quote in the past, we'll keep you informed about our products and services for a period of up to three years.

We may also contact you if you have not completed an online quotation to see if we can offer to help with this.

You can ask us to stop contacting you about our products and services by:

e-mail: [service@ingenie-insurance.co.uk](mailto:service@ingenie-insurance.co.uk)

post: ingenie Services, Europa House, Midland Way, Thornbury, Bristol, BS35 2JX

phone: 0330 678 0652

### **Sharing your information with others**

We will share your personal information with:

- Our panel of insurers (for the purposes of an insurance quotation and
- The insurer named on your Statement of Fact

We may also share your personal information with:

- Your spouse or civil partner if they contact us on your behalf, provided they are included as a named driver on your insurance policy, and other individuals who contact us on your behalf if you are available to provide your express consent when they contact. However, we will only accept changes of address and instructions to cancel your policy from you. If at any time you would prefer for us to only deal with you, please let us know.
- Organisations that have a specific legal role such as statutory bodies, regulatory authorities and other authorised bodies
- Organisations where we have a duty to or are permitted to disclose your personal information by law, such as a valid request from the police or other organisation in the interest of preventing and detecting crime
- Fraud prevention agencies and operators of registers available to the insurance industry to check information and prevent fraud
- Credit reference agencies to check your credit history. This check will be recorded on your credit reference file without affecting your ability to apply for credit or other financial products. Please see [www.equifax.co.uk/crain.html](http://www.equifax.co.uk/crain.html) for more details about credit reference agencies and their use of your personal information.
- Premium Credit Limited (a third-party credit provider and separate data controller), if you choose to finance your insurance premium by instalments. This is to enable Premium Credit Limited to prepare relevant credit agreements, carry out credit checks (as required by law) and to provide you with credit services. Where your personal information is shared with Premium Credit Limited, you will receive a copy of Premium Credit Limited's data privacy notice. If you wish to contact Premium Credit Limited, please visit [www.premiumcredit.com](http://www.premiumcredit.com) for their contact details
- Third parties we use to recover money you may owe us
- Another company if our business or part of it is bought or taken over by that company to make sure your motor policy can continue to be serviced

### **How long will we keep your personal information?**

We'll only keep your personal information for as long as is reasonably necessary for the purposes outlined in this privacy notice and to fulfil our legal and regulatory obligations. For further information please contact the Data Protection Officer at the address shown at the start of this Privacy Policy.

## **Use and storage of your personal information overseas**

Your personal information may also be transferred outside the European Economic Area (EEA). Measures will be put in place to protect your data and these safeguards shall be no less stringent than the requirements of English law.

## **Your rights**

You have certain rights including:

- the right to be informed about the collection and use of your personal information
- the right to ask for access to and a copy of your personal information
- the right to ask us to correct any inaccurate personal information
- the right to request the restriction of processing, or object to the use of, your personal information
- where you've previously given us your permission to use your personal information, the right to withdraw that permission
- the right to ask us to move, copy or transfer your personal information to a third party
- the right to object to an automated decision
- the right to complain to the Information Commissioner's Office at any time if you object to the way we use your personal information. For more information please visit [www.ico.org.uk](http://www.ico.org.uk)

In some cases when you make a request regarding your personal information, we may not be required or may not be able to comply as this may result in us not being able to fulfil our legal, regulatory or contractual obligations or there's a minimum statutory period that we must keep your personal information. We'll let you know when this is the case.