

# ingenie Services Privacy Policy

The privacy and security of your personal information is very important to 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 data are that it is necessary for the

- performance of your insurance policy
- purposes of 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:
  - o 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
  - o 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.

- o 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.
- o Carrying out processes such as statistical analysis to help improve the products and services we offer.
- o 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 arranged through 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.

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
- ingenie Services Limited, a specialist provider of telematics-based insurance products and services, who use an in-car telematics device and mobile phone applications which analyse driver behaviour. For more information on ingenie Services Limited's use of your personal information, please see [www.ingenie.com/privacy-policy](http://www.ingenie.com/privacy-policy)

We may also share your personal information with:

- Premium Credit Limited (a third-party credit provider), 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
- 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.
- Your parent or guardian with your express consent
- 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.
- 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 object to an automated decision
- the right to ask us to move, copy or transfer your personal information to a third party
- 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.

## **Legal Notice**

By using this website, you agree to its Terms and Conditions.

The website is hosted, administered and operated by Europa Group Limited which is authorised and regulated by the Financial Conduct Authority (FCA). Our FCA register number is 309764. Registered office: Europa House, Midland Way, Thornbury, Bristol BS35 2JX. Registered in England with company number 3279177.

### **Law**

The applicable law governing the contents and use of this site and any disputes arising from use of this site is English law and disputes will be subject to the exclusive jurisdiction of the English courts. If any of the following provisions are unlawful, void or for any purpose unenforceable then the particular provision will be deemed severable and will not affect the validity and enforceability of the remaining provisions.

### **Access to the Website**

Unless otherwise specified, the information on this website is directed solely at those who access the website from the United Kingdom.

### **Disclaimer**

The information about the products and services contained in this website is general in nature and for information purposes only. If you purchase a product or service through this website, the product or service will be subject to the specific product terms and conditions provided to you as part of the sales process. Written quotations are available on request from our contact centre.

We take care to ensure that the information contained in this website is accurate and up-to-date. However, unless we agree otherwise with you in writing, we make no representation or warranties about the accuracy, completeness, reliability or suitability for any purpose of the information and related graphics published in this website, which may contain technical inaccuracies and typographical errors.

We aim to ensure that the website operates properly at all times but the website is provided on an "as is" and "as available" basis and we do not provide any warranties or guarantees that the website will have any particular levels of availability or functionality.

We are not providing any legal, accounting or other professional advice or opinion on specific facts or matters. We shall not be liable for any indirect or consequential damages. However, nothing shall exclude or restrict liability for death or personal injury resulting from our negligence. Also, nothing shall exclude or restrict our obligations under the Financial Services and Markets Act 2000 or any other current or future Financial Services legislation.

### **Alterations**

We reserve the right, at any time and without notice, to revise the contents of this website including the Terms and Conditions. Any changes to the Terms and Conditions will be posted on this website and by continuing to use this website following any such change, you will signify that you agree to be bound by the revised conditions.

However, we would not amend the data protection terms in a way that would disadvantage you.

### **Intellectual Property Rights**

All copyright, trade and service marks, design rights, database rights and other intellectual property rights and goodwill in or relating to the contents of the website belong either to us or to our third party licensors. Permission is granted to copy electronically and to print in hardcopy portions of this website, solely for the purpose of using the site to seek a quotation or buy products and services. Any other use of materials on this website (including reproduction for purposes other than those noted above, and alteration, modification, distribution or republication) or framing or linking to this website (or any part of) without prior written permission is strictly prohibited.

### **Links**

In this website certain links, including hypertext links, will lead you to websites that are not under our control ("Third Party Sites"). These links are provided for your information and convenience and the inclusion of any link does not imply endorsement by us in any way of the Third Party Site. We are not responsible for the content of any Third Party Sites or for the legal consequences of you entering into any contracts with third parties as a result.