

# Tradex Insurance Company Ltd.

## Privacy Notice

<b>Data Controller:</b>	<b>Tradex Insurance Company Limited</b>
<b>Contact for queries:</b>	<b>Data Protection – Tradex Insurance Company Ltd. 7 Eastern Road, Romford, Essex RM1 3NH.</b>  <b>Telephone: 01708 729510</b>
<b>Data Protection Officer:</b>	<b>dpo@tradexinsurance.com</b>

### About Us

Tradex Insurance Company Limited (TIC) is the controller and responsible for your personal data (collectively referred to as “TIC”, “we”, “us” or “our” in this Privacy Notice). TIC is committed to protecting the privacy and confidentiality of all individuals and takes its responsibilities regarding the security of data very seriously. This includes processing any personal data lawfully, fairly and in a transparent manner. TIC is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. TIC is also authorised by the Jersey Financial Services Commission and the Guernsey Financial Services Commission.

Where you provide personal information to us about other individuals (for example, members of your family or employees) we will also be controller of, and responsible for, their personal data. You should refer them to this notice before providing personal data to us on behalf of others.

### Linking to third party websites

We do not take responsibility for the privacy policies or practices of other sites, even where you access those using links from our website. You are advised to read the Privacy Policy of other websites prior to using them.

### What information do we collect about you?

As an insurer and as part of our service we will only collect information from you so that we can quote for products that may be suitable for you and/or administer existing policies and claims. In the financial services industry, we call this fact finding. Fact finding provides us with all the information that we need from you, in order to provide you with suitable products that meet your circumstances and requirements.

When obtaining information from you, we will do so through our website, phone, email, text, post, or face to face and will confirm the accuracy of the data collated. It is important that all the data we hold about you is accurate so that we can provide quotations for insurance products that are suitable for you.

The types of information we will collect from you are shown below and can include sensitive personal data such as medical conditions or criminal and motoring offence data where required to provide a quotation for, and to administer, your policy and manage any related claims.

We may need personal information including details of members of your family, lifestyle, finances, business, or education.

If you provide personal information about other individuals (such as employees, named drivers, family members etc.), you should refer them to this Privacy Notice as we will be responsible for their personal information also.

If you would like us to discuss your policy or the setting up of a policy with someone else who is acting on your behalf then we will need your consent first.

Your data may also be used to help us assess your ongoing needs and to inform you about any insurance products or services that may meet those needs.

## **How will we use this information?**

We will only use your data in ways that you would reasonably expect us to. Below summarises how we use your data.

We will use the information you provide to us in the preparations of insurance quotations, to manage your insurance, to manage claims, and to collect premiums.

We will contact you, or your intermediary, at renewal or when your policy is due to be reviewed so that we can continue to ensure that the policy you have in place remains suitable. Where your circumstances or personal information have changed we will update our records.

We will also use your data:

- For crime prevention in relation to fraud or money laundering.
- For record keeping purposes.
- To handle a complaint if you are not happy with the service you have received from us.

We also use your personal information to make sure we comply with any financial sanctions that apply in the United Kingdom or overseas. We may need to request additional information following such checks.

We have set out below a description of the personal information, including special category data, which we expect to process in the ordinary course of our activities and which of the lawful bases and processing conditions (where applicable) we rely on to do so.

## Policyholders

What personal data we may collect

Personal Data	Special Category Data
<ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Telephone number</li> <li>• Email address</li> <li>• Home address</li> <li>• Job title</li> <li>• National Insurance Number</li> <li>• Driving license details and driving history (which may include tracking information or telematics information)</li> <li>• Vehicle Registration Numbers</li> <li>• Payment Data (Credit / Debit Card &amp; Bank Details)</li> <li>• County Court Judgement &amp; Bankruptcy Data</li> <li>• Details about you and your personal circumstances (e.g., marital status, occupation)</li> <li>• Other details if pertinent to the scope of the quote or policy (e.g., required business licenses, affiliations, memberships of or registrations with regulatory bodies, or professional qualifications)</li> <li>• Information about travel plans, destinations, and planned activities</li> <li>• Voice Recordings of telephone calls to our customer service departments for training and monitoring purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• Disability information</li> <li>• Health data</li> <li>• Criminal History (including offences and alleged offences and any caution, court sentence or criminal conviction) but only if this information is pertinent to the quote process, or policy administration, and / or fraud prevention investigations</li> </ul>

What we use personal data for

Purpose for processing	Lawful basis for using personal data	Processing condition for using special category data
In order to arrange your policy	<ol style="list-style-type: none"> <li>1. Our legitimate business interest to use your information to provide insurance.</li> <li>2. Performance of your insurance contract.</li> </ol>	<ol style="list-style-type: none"> <li>1. Processing is necessary for reasons of substantial public interest (insurance purposes)</li> <li>2. You have provided us with your explicit consent to the processing.</li> </ol>

Purpose for processing	Lawful basis for using personal data	Processing condition for using special category data
To carry out fraud, credit, and anti-money laundering checks	Performance of your insurance contract.	<ol style="list-style-type: none"> <li>1. Processing is necessary for reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent to the processing.</li> <li>3. Processing is necessary for reasons of substantial public interest (preventing or detecting unlawful acts).</li> </ol>
To evaluate your application and ability to pay for your policy by instalments (if applicable)	Performance of your insurance contract.	<ol style="list-style-type: none"> <li>1. Processing is necessary for reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent to the processing.</li> </ol>
To provide and manage your insurance policy	<ol style="list-style-type: none"> <li>1. Our legitimate business interest to use your information to provide insurance</li> <li>2. Performance of your insurance contract.</li> </ol>	<ol style="list-style-type: none"> <li>1. Processing is necessary for reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent to the processing.</li> </ol>
Communicating with you and resolving any complaints that you might have	<ol style="list-style-type: none"> <li>1. Performance of your insurance contract.</li> <li>2. Our legitimate business interest to use your information to manage and respond to complaints.</li> </ol>	<ol style="list-style-type: none"> <li>1. Processing is necessary for reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent to the processing.</li> <li>3. Processing is necessary in order for us to establish, exercise or defend our legal rights.</li> </ol>

Purpose for processing	Lawful basis for using personal data	Processing condition for using special category data
<p>To transfer to third parties for the purpose of providing you with the services required under the insurance contract or other services which you have elected to receive from us in connection with the insurance contract.</p>	<p>1. Performance of your insurance contract.</p>	<p>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</p> <p>2. You have provided us with your explicit consent to the processing.</p>
<p>To transfer to third parties where you have elected to enter into a contract with that third party for separate services.</p>	<p>You have provided your consent to the processing.</p>	<p>You have provided your explicit consent to the processing.</p>
<p>Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.</p>	<p>1. Performance of your insurance contract.</p> <p>2. Our legitimate business interest to use your information to ensure fraud is detected.</p>	<p>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</p> <p>2. You have provided us with your explicit consent to the processing.</p> <p>3. Processing is necessary for reasons of substantial public interest (preventing or detecting unlawful acts).</p>
<p>Complying with our legal or regulatory obligations</p>	<p>Processing is necessary in order for us to comply with our legal obligations.</p>	<p>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</p> <p>2. You have provided us with your explicit consent.</p> <p>3. Processing is necessary in order for us to establish, exercise or defend our legal rights.</p>

<b>Purpose for processing</b>	<b>Lawful basis for using personal data</b>	<b>Processing condition for using special category data</b>
Recover outstanding payments	Our legitimate business interest to use your information to recover debts.	Processing is necessary in order for us to establish, exercise or defend our legal rights.
To provide you, or permit other selected third parties to provide you, with information about goods or services we feel may interest you, including news updates & details of special offers.	You have provided your consent to the processing (which can be withdrawn at any time).	We do not process special category data for this purpose.
To measure the effectiveness of our advertising	Our legitimate business interest to use your information to ensure our advertising is effective.	We do not process special category data for this purpose.
To improve our customer service	Our legitimate business interest to use your information in the improvement of our customer service.	We do not process special category data for this purpose.
To provide data analysis in order to assist us with the pricing of our products and detect market trends.	Our legitimate business interest to use your information which does not overly prejudice you.	We do not process special category data for this purpose.
To personalise your repeat visits to our website and web portals.	Our legitimate business interest to use your information.	We do not process special category data for this purpose.
To notify you about changes to our services or products	Our legitimate business interest to use your information to keep our customers up to date with changes to our products or services.	We do not process special category data for this purpose.

<b>Purpose for processing</b>	<b>Lawful basis for using personal data</b>	<b>Processing condition for using special category data</b>
To administer our website and web portals and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes	Our legitimate business interest to use your information to maintain our website(s) and web portals.	We do not process special category data for this purpose.
To allow you to participate in interactive features of our services / website / web portals.	Our legitimate business interest to use your information to maintain our website and web portals and undertake website analytics.	We do not process special category data for this purpose.
To transfer data to third parties for the purpose of conducting internet analytics.	Our legitimate business interest to use your information to maintain our websites and undertake website analytics.	We do not process special category data for this purpose.
For analytical purposes and to improve our products and services. Where possible, we will anonymise such information	Our legitimate business interest to use your personal information for services improvement.	We do not process special category data for this purpose.
Providing improved quality, training, and security (for example, with respect to recorded or monitored phone calls to our contact numbers); the technology utilised may include voice analytics	Our legitimate business interest to provide secure and quality services.	<ol style="list-style-type: none"> <li>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent.</li> </ol>

## Named driver

What personal data we may collect

Personal Data	Special Category Data
<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Gender</li> <li>Home address</li> <li>Driving license details and driving history (which may include tracking information or telematics information).</li> <li>Relationship with policyholder</li> <li>Vehicle Registration Numbers</li> <li>Voice Recordings of telephone calls to our customer service departments for training and monitoring purposes.</li> </ul>	<ul style="list-style-type: none"> <li>Disability information</li> <li>Health data</li> <li>Criminal History (including offences and alleged offences and any caution, court sentence or criminal conviction) but only if this information is pertinent to the quote process, or policy administration, and / or fraud prevention investigations</li> </ul>

What we use personal data for

Purpose for processing	Lawful basis for using personal data	Processing condition for using special category data
In order to manage our policyholder's policy effectively	<ol style="list-style-type: none"> <li>Our legitimate business interest to use your information to provide the policyholder's insurance.</li> <li>Performance of your insurance contract.</li> </ol>	<ol style="list-style-type: none"> <li>Processing is necessary for the reasons of substantial public interest (insurance purposes).</li> <li>You have provided us with your explicit consent.</li> </ol>

## Claimant

What personal data we may collect

Personal Data	Special Category Data
<ul style="list-style-type: none"> <li>Name</li> <li>Date of birth</li> <li>Gender</li> <li>Telephone number</li> <li>Email address</li> <li>Home address</li> <li>Relationship with the policyholder (if any)</li> <li>Job title</li> <li>Vehicle Registration Number</li> <li>Insurer details/information relating to previous policies or claims (if any)</li> <li>Dashcam or CCTV footage of the loss event where available</li> </ul>	<ul style="list-style-type: none"> <li>Disability information</li> <li>Health data</li> <li>Criminal History (including offences and alleged offences and any caution, court sentence or criminal conviction) but only if this information is pertinent to the claim and / or fraud prevention investigations.</li> </ul>



Personal Data	Special Category Data
<ul style="list-style-type: none"> <li>• Financial information such as bank details</li> <li>• Information obtained via publicly available sources</li> <li>• Information obtained via checking sanctions lists</li> <li>• Voice Recordings of telephone calls to our customer service departments for training and monitoring purposes.</li> </ul>	

What we use personal data for

Purpose for processing	Lawful basis for using personal data	Processing condition for using special category data
<p>To provide and manage your claim (whether we are your insurers, or you are a third party making a claim against us).</p>	<ol style="list-style-type: none"> <li>1. Our legitimate business interest to use your information to manage an insurance contract and claim.</li> <li>2. Performance of your insurance contract.</li> </ol>	<ol style="list-style-type: none"> <li>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent.</li> <li>3. Processing is necessary for reasons of substantial public interest (preventing or detecting unlawful acts).</li> <li>4. Processing is necessary in order for us to establish, exercise or defend our legal rights.</li> </ol>
<p>To carry out fraud, credit, and anti-money laundering checks</p>	<p>Performance of your insurance contract.</p>	<ol style="list-style-type: none"> <li>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent.</li> <li>3. Processing is necessary for reasons of substantial public interest (preventing or detecting unlawful acts).</li> </ol>

Purpose for processing	Lawful basis for using personal data	Processing condition for using special category data
Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.	Our legitimate business interest to use your information to ensure fraud is detected.	<ol style="list-style-type: none"> <li>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent.</li> <li>3. Processing is necessary for reasons of substantial public interest (preventing or detecting unlawful acts).</li> </ol>
Complying with our legal or regulatory obligations	Processing is necessary in order for us to comply with our legal obligations.	<ol style="list-style-type: none"> <li>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent.</li> <li>3. Processing is necessary in order for us to establish, exercise or defend our legal rights.</li> </ol>
Providing improved quality, training, and security (for example, with respect to recorded or monitored phone calls to our contact numbers); the technology utilised may include voice analytics	Our legitimate business interest to provide secure and quality services.	<ol style="list-style-type: none"> <li>1. Processing is necessary for the reasons of substantial public interest (insurance purposes).</li> <li>2. You have provided us with your explicit consent.</li> </ol>

## Marketing

As part of our service, we like to keep our customers up to date with new products or offers that are available and may be of interest. Therefore, we may contact you from time to time through email marketing, phone, text, or other types of marketing material. If you wish to opt out of this at any point then please let us know.

We do not use pre-ticked boxes or make assumptions that you have given your consent. Your consent must be freely given by positively opting in or making a clear affirmative action that you are giving your consent. We will do our absolute best to ensure you know exactly what you are consenting to and remind you that you may withdraw your consent at any time and

that you have a general right to object to direct marketing at any time. Where consent is obtained, a record of this will be made confirming what you have consented to and how consent was obtained.

- **Customers:** Our customers are important to us however we appreciate that on some occasions you may wish to look elsewhere. If you do, we would like to stay in touch and therefore will ask for your consent in order for us to do so.
- **Potential Customers:** Where you have expressed an interest in a product but have then decided not to proceed we would like to keep in touch therefore will ask for your consent to do so in case a product may be of interest to you at a later date.

## Information from other sources

We may obtain information from other sources including:

- From our records.
- From your company website (if relevant).
- From third parties (including brokers, insurance companies, business partners, suppliers, payment & delivery services, third party claimants under a policy, medical representatives in the event of a claim, accident management companies, advertising networks, analytics providers, search information providers and credit reference agencies).
- From other resources, for example, risk assessment models, pricing data, statistics and other information from public databases and websites.
- Other publicly available sources, including, but not limited to, Google Earth and social media
- Through customer and broker surveys.
- Via insurance industry fraud prevention and detection databases (including, but not limited to, Claims and Underwriting Exchange (CUE), Motor Insurers Anti-Fraud and Theft Register (MIAFTR) and MyLicence).
- Sanctions Screening Tools
- From government agencies such as HMRC and from professional regulators.

## Who will it be shared with?

We may also share your information with selected third parties, in order to offer services to you or to perform any necessary functions on our behalf. This may include:

- Your relatives, executors or, guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with you such as your insurance broker
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us and make changes on your behalf.
- Our insurance partners such as brokers, other insurers, reinsurers, or other companies who act as insurance distributors.

- Other third parties who assist in the administration of insurance policies such as another Insurance Company if there has been an accident which requires a claim to or from that Insurance Company.
- We may share the personal information of any persons named on the policy with third parties to obtain information which may be used by us to inform its risk selection, pricing, and underwriting decisions
- Other third parties you have asked us to engage with
- Passing information to a third party for the purpose of validating your No Claims Discount (NCD) entitlement and this may be made available to other insurers
- Overseas assistance companies
- Loss Adjusters
- Engineers
- Emergency Assistance Companies
- Your healthcare practitioner
- Solicitors
  - To manage claims (whether you are an insured or a third-party claimant)
  - To manage legal cases brought against us or on our behalf
  - To manage regulatory investigations
- Business partners
  - Software Providers, who provide the technical infrastructure to allow us to provide your quote, policy, and claims administration
  - Clients: for whom we provide insurance policy and administration
  - Companies you have agreed may receive your information to allow you to enter into a contract with them (for example, reward schemes or claims management companies)
- Suppliers
  - Surveyors
  - Companies engaged by us to provide contracted services. This is a wide-ranging list of companies, and their use will depend upon the circumstances. For example, in the event of a claim we may engage the services of recovery agents, car hire companies, mechanics or body shops,
  - Companies engaged by us to provide aspects of our communications with you (for example, web / web portal hosting),
- Finance Providers
- Enquiry Agents /Counter Fraud investigators
- Credit reference agencies
- Debt Collectors
- Survey companies
- Data analytics advisors
- Where you have given your explicit consent, to third parties for marketing purposes.

Disclosure of your personal information to a third party outside of Tradex Insurance Company Limited will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also share your information with:

- Prospective buyers, in the event that we sell any business assets.
- Our auditors and accountants to enable them to assist with our record keeping.
- Regulators and other authorised bodies, whenever we are required to do so by law.
- We believe that such disclosure is necessary in order to assist in the prevention or

detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

We may also share your information with other Insurance Industry databases including the Motor Insurance Database. These may be accessed by police and other organisations to check the details of your motor insurance or your personal circumstances.

## **What we will do to ensure the security of personal information**

We want you to have confidence in how we use and hold your data. We know that to achieve this we must preserve the security and confidentiality of your personal information. We have therefore developed a range of organisational, procedural, and technical security measures designed to protect your personal information from unauthorised use or disclosure. Examples of some of these measures include:

- User and privileged account management including appropriate policies for password complexity, length, and history.
- Auditing of system users and administrators.
- Regular backup schedules and disaster recovery environment for key systems and services.
- Secure file transfer methods are used to encrypt data.
- Usage of data loss prevention tools within the Company.
- Data breach detection: Security tools in place to detect unusual or abnormal activity.
- Data breach investigation: Audit and logging tools used to investigate any potential or reported breaches.
- Data breach response: A plan that pulls together our compliance, legal and IT security teams to ensure rapid assessment and mitigation of data breaches

## **Overseas transfers**

We (or third parties acting on our behalf) may store or process information that we collect about you in jurisdictions which do not offer the same level of protection as the UK, Guernsey, or Jersey. This includes where we provide policies locally in the UK, Guernsey, or Jersey but a third party connected to the distribution of the policy is based in a third country, for example in the US. Where we make a transfer of your personal data outside of the UK, Guernsey, or Jersey we will take the required steps to ensure that your personal data is protected. Such steps may include placing the receiving party under contractual obligations to protect your personal data to specific adequate standards. If you would like further information regarding the steps we take to safeguard your personal information, please contact us using the contact information provided at the head of this Privacy Notice.

## How long we will retain your data

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with our contractual, legal, and regulatory obligations.

We have implemented a Document Retention Policy which records of details how long various types of information should be retained. The Policy is reviewed on a regular basis to ensure that it aligns to current legal and regulatory requirements. The retention periods vary depending upon the circumstances of an individual matter but in general our retention periods for customer facing documentation can be set out as follows:

Quote Information	3 months (unless marketing consent received from you in which case 13 months)
Policy Documents	7 years from cancellation of policy (some policies have a longer retention period as required by regulation)
Claims Documents	7 years from date of last settlement /order (this period may be extended if the claim involves a minor or the accident resulted in catastrophic injuries)
Complaints	3 years from the complaint being resolved or the policy retention period whichever is the longer

If you would like further information regarding the periods for which your personal information will be stored, please contact us using the contact information provided at the head of this Privacy Notice.

## Information collected via our website

We collect web usage information when you visit our website, generally known as cookies. The information that our cookies collect includes IP address, date, time, page viewed or searched relating to your browsing activity, referring website and length of stay. Where you have provided personal data we may collect to enable us to build a demographic profile.

We may also use cookies to create statistical data regarding the use of our website. Where statistical data is produced, we may then use that data to help us assess the effectiveness of marketing campaigns, develop, and deliver services and information to improve the overall effectiveness of our website. We will also use IP addresses to analyse trends, track users' movements and gather broad demographic information for our own internal use.

## What are your legal rights?

In certain circumstances (and subject to certain exemptions), you have a number of rights in relation to your personal data:

- The right to be informed.
- The right of access to your personal data and certain information about how we process it.
- The right to rectification if the information that we hold about you is incorrect or incomplete.
- The right to erasure.
- The right to object to our processing of your personal data.
- The right to restrict processing.
- The right to request that we transfer your data directly to a third party.
- Where we are relying on consent to process your personal data, you have the right to withdraw your consent.

Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects concerning them or similarly significantly affects them. We do not carry out any profiling or automated decision-making processes. If our practices change, we will notify you and advise you of your rights associated with such activities.

We will always explain to you how we are dealing with your request. In some circumstances (such as the right to erasure or withdrawal of consent), the exercise of your rights might mean that we can no longer provide our services to you. We will always discuss this with you in advance.

## Changes to this Privacy Notice

We keep our Privacy Notice under review, and it is updated periodically. For example, those changes may be due to government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up-to-date Privacy Notice.

This Privacy Notice was last updated on: **21<sup>st</sup> June 2022**

## Right to complain

We hope that the service you receive from us is to the high standard you would expect. If at any point you are unhappy with the way we have used your data then please notify us by email, post or phone using the details above.

If you still remain concerned about the way we collect or use your personal data you can raise your concern with the independent authority set up to uphold information rights and data privacy of individuals in your jurisdiction. The independent authorities' details are as follows:

- If you are located in the UK, contact The Information Commissioner's Office (ICO) on 0303 123 1113. For further details you may visit the ICO website [www.ico.org.uk](http://www.ico.org.uk)
- If you are located in Guernsey, contact The Office of the Data Protection Authority (ODPA) on 01481 742074. For further details you may visit the ODPA website at <https://odpa.gg>
- If you are located in Jersey, contact The Office of the Information Commissioner (OIC) on 01534 716530. For further details you may visit the OIC website at <https://oicjersey.org>