

# Fair Processing Notice

How we handle your data when you have a policy with us.



# GENERAL DATA PROTECTION REGULATION (GDPR) FAIR PROCESSING NOTICE:

## HOW WE HANDLE YOUR DATA WHEN YOU HAVE A POLICY WITH US

The General Data Protection Regulation (GDPR) establishes one set of data protection rules across Europe. It is designed to give individuals better control over their personal data held by organisations so we have produced this document to help you understand how we handle and process your data.

A Choice is a trading name of Premium Choice Ltd. Premium Choice Ltd is authorised and regulated by the Financial Conduct Authority, registration number 312245.

A Choice has received your personal data either directly from yourself or by way of you submitting your data to us, by your use of a price comparison website.

1. **A Choice** is the trading name of Premium Choice Ltd (and/or any associated trading name that is registered with the Financial Conduct Authority) has received your personal data either directly from yourself or by way of you submitting your data to us, by your use of a price comparison website.

The personal data that we hold about you, and any other person that you have included on any policy of insurance that you have purchased, consists of the following:

- Full name and title
- Full address
- Date of birth
- Relationship status
- Contact telephone numbers
- Email address
- Occupation details (the job you perform and industry in which you work)
- Lifestyle information
- Credit/debit card details
- Bank Details (if paying by finance)
- Driving licence details
- Vehicle details
- Claims history

Sensitive Personal Data and Special Category of data may take the form of your medical history and/or criminal/driving convictions.

## 2. **Call recording and monitoring**

We may record, monitor and store calls, emails, SMS messages or other communications for:

Business purposes such as quality control and training

- Processing necessary for entering into or performance of a contract
- Prevention of unauthorised use of our telecommunication systems and websites
- Ensuring effective systems operation
- Meeting any legal obligation
- Prevention or detection of crime
- The legitimate business interests of the data controller

3. **A Choice** are the data controller in common with any price comparison website that you may have used. For more information please visit the comparison website (s) to view their privacy policy and find out how they will use your data.

4. **The legal basis of processing is:**

- a. that the processing is necessary for the performance of the contract of insurance, namely the Policy; and
- b. that the processing is necessary for the purposes of the legitimate interests pursued by **A Choice**, as authorised by the Financial Conduct Authority.
- c. that the processing of sensitive personal data and special category of data is necessary for reasons of substantial public interest; 'if the processing is for an insurance policy'.
- d. that the processing is necessary for compliance with a legal obligation.

5. **A Choice** will use your personal data, and that of any other person named on your policy, for any one or more of the following purposes:

- a. for quotation and/or arrange and/or administer the insurance policy and/or credit agreement. This may appear on your credit report and will be visible to other credit providers. It will be clear that this is a quotation rather than a credit application by you to pay by monthly installments;
- b. to communicate with you for any purpose in relation to the insurance policy (including renewal options and/or your credit agreement) by letter, telephone, fax, email or text message;
- c. to communicate with your insurance company finance provider for any purpose in relation to the Policy by letter, telephone, fax or email;
- d. to validate the insurance information that you have provided and to verify your identity, in some cases match it against information that is stored by a third party;
- e. to prevent and detect insurance fraud and fraudulent transactions by checking, sharing and recording any information provided by you with Fraud prevention agencies and public bodies including the Police. This may extend to use information that is recorded by Fraud Prevention agencies in other countries. We will ensure an adequate level of protection is in place to protect your personal information, such as contractual protections which have the purpose of ensuring the security of any information passed;
- f. to ensure compliance with international financial sanctions requirements. This will include the checking of your information against the HM Treasury list of financial sanctions targets as well as other publicly available sanctions lists;
- g. to conduct analytics, on a personal or aggregated basis, in respect of product performance, rating and underwriting factors, allowing us to improve our services offered.

6. **A Choice** may transfer your personal data for any one or more of the following purposes:

- a. Underwriting – we will pass data to our panel of insurers to obtain quotations. Once a policy is accepted, your insurer will become a joint data controller. For more information please visit your insurers website to view their privacy policy and find out how they will use your data;
- b. Making credit decisions – If you elect to pay you insurance by monthly instalments it will also be used to make decisions about your creditworthiness. If you are paying by monthly instalments your data will also be shared with Close Brothers Limited, who we use for finance agreements;
- c. Legitimate interest – to third parties where this is necessary or desirable for the legitimate business interests of Premium Choice; or as required by law;
- d. Administration – we will transfer your personal data to third parties where this is necessary to administer the Policy and/or provide any of the services that are necessary relating to your insurance; and they may communicate with you in relation to the policy by letter, telephone, fax or email; or other communications in accordance with UK and European law.
- e. A Choice will not sell your data to third party companies . However we may share your data with another company if our business or part of it is bought or taken over by that company to ensure your insurance policy can continue to be serviced or as part of preliminary discussions with that company about a possible sale or take over;

7. **A Choice** with your express consent will deal with another person on your behalf to help manage your insurance policy. Subject to answering security questions correctly, we will deal with that other person in connection with your policy. This will include the personal data and sensitive/special category data as described in section 1. We will continue to discuss your policy with your nominated person until you ask us not to.
8. **A Choice** will disclose No Claims Bonus (NCB) and Claims details to your new provider should you Lapse/Cancel your policy.
9. **A Choice** will update your personal data from time to time based on information received from you or any other party related to your insurance.
10. **A Choice** will ask you when you purchase your policy if you would like to opt in to auto-renewal. However, even if you opted in at this point, you have the right to opt out at any point.
11. **A Choice** will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Fair processing policy and in order to comply with our contractual, legal and regulatory obligations.

We have implemented a Document Retention Policy which records details how long various types of information should be retained. The retention periods vary depending upon the circumstances of an individual matter, however for a period of at least 6 years after the policy ends.

12. **A Choice** is primarily an online business and our default method of communication with you, will be by electronic means which includes email, SMS and telephone calls. We have adopted this method as our primary route of communication because it is important that documentation relevant to your contract of insurance, is sent to you as quickly as possible. This is to ensure that we are able to effectively manage and arrange your insurance. There may be certain situations where we require to send essential information, relating to your contract of insurance to you by all available means of communication. This may include postal or electronic means, irrespective of any method of transactional communication that you may have agreed with us previously. We will only do this in circumstances where it is imperative that we use any available means to get important information to you.

This may include:

- Policy quote
- Policy renewal invitation
- Policy confirmation and documentation
- Policy adjustment
- Policy requesting information or payment
- Claims information
- Policy cancellation

You are not able to unsubscribe from receiving transactional communication from us that is about any policy and/or service that you have taken out with us. You can request that information is sent to you in a format other than electronic means however this will need to be agreed with us. Receiving a transactional communication from us doesn't mean you are automatically subscribed to receive marketing communications from us.

13. **A Choice** will occasionally send or contact you with details of motor related products, services or promotions by telephone, email, SMS or post that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to object/unsubscribe at any time
14. **A Choice** may use automated decision making when processing your personal information to determine whether not to offer you insurance. We might also use automated processes to create a profile of you to help ensure decisions are made accurately, fairly and efficiently. You have the right to contest these decisions (including providing any additional information) and if you wish to exercise this right you can contact us regarding your quotation or policy to discuss further.

15. You have the right to request access to and rectification or erasure of personal data or restriction of processing concerning you and to object to processing. In addition, you have the right to data portability. Any questions you may have about data protection, retention and portability, should be addressed to the Head of Compliance at the address below

**How to contact us**

For any further information in relation to the processing of your data, please contact:

**Compliance Department  
Premium Choice  
Pendeford House  
Pendeford Business Park  
Overstrand  
Wolverhampton  
WV9 5AP**

**Telephone:** 0330 127 45004

**Email:** [compliance@premiumchoice.co.uk](mailto:compliance@premiumchoice.co.uk)

16. In certain circumstances, in relation to your use of data by A Choice, you also have the right to lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk>).

### **Our websites and general Information Security**

Our Website does not enable our visitors to communicate with other visitors or post information to be accessed by others

Any other websites that may be linked to or by our website(s) will be subject to their own policies which may differ from ours. You should carefully read the privacy policies of these websites before submitting any personal information.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will collect information from you when you use our website. This information may include:-

Data that allows us to remember you how you use our website. This helps you by saving you from re-keying information when you return to our site. This also allows us to present our website content to you based on your interests. To enable us to do this, we use "cookies" to collect data. Cookies are text-only strings of information that are stored on your web browser or computer. You have the ability to accept or decline cookies by modifying the settings of your web browser. However, you may not be able to use all the interactive facilities of our site if cookies are disabled. Further details are available on our Cookie Policy or for further information about how to disable cookies in your browser please visit the About Cookies Website.

Your IP address (this is your computer's individual identification number for internet connection) that is automatically logged by our web server. This is used to note your interest in our website.

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