

Privacy Policy

At Freeway UK Insurance Services Limited we are aware of the trust you place in us when you buy your insurance through us, and our responsibility to protect your information. The Data Protection Act 1998 regulates the use of 'personal data'; essentially any information about identifiable living individuals. As a 'data controller' under the act, Freeway UK Insurance Services Limited must comply with its requirements.

We reserve the right to amend or modify this privacy policy at any time in response to changes in applicable data protection and privacy legislation.

For further information on the Data Protection Act and your rights please visit the website for the Information Commissioner's Office – www.ico.org.uk.

What information we process and share

Your information comprises of all the details we hold about you and your transactions and includes information we obtain about you from third parties. We will only collect the information we need so that we can provide you with the service you expect from us. For example:

- Your name and the name of any drivers to be covered under your insurance policy
- Your address and address history
- Financial information
- Employment details
- Vehicle to be covered
- Identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address
- Information relating to claims and motoring convictions
- Details of any medical conditions which are reportable to the DVLA

When we, and fraud prevention agencies, process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

How long we will retain your information

We will retain all information we hold on you for a minimum of seven years after you cease to be a customer of ours or following the settlement of any claim, whichever is longer. We may keep your information longer for legitimate business reasons, for example, claims settlement purposes. If you require further information relating to the timescales in which we hold your information please call our customer services team or by writing to the Data Protection Officer using the contact details below.

How we will use your information

We will use your information for the following purposes:

To provide you with a quote

We will use the information provided to us to find you the best quote available from our panel of insurers.

To provide you with information about our services

It is very important to us that we provide a service that meets the expectations of our customers. We may use the information that you have provided us to contact you by telephone, email or post to tell you about products and services which may be of interest to you.

If you prefer to opt out of such direct marketing activities please call our customer services team or by writing to the Data Protection Officer using the contact details below.

From time to time we may need to change the way we use your information. Where we believe you may not reasonably expect such a change we will contact you. When we do so, you will have 60 days to object to the change but if we do not hear from you within that time we will assume that you have given your consent to the change.

Who we will share your information with

Freeway use one insurer for taxi purposes, and a panel of insurers for fleet purposes, to find the best quotation available to you based on your circumstances. When you give us your information it will be shared with our panel of insurers. We will do that in order to provide you with the best possible products and service experience.

During the course of our dealings with you we may need to disclose some information to other insurers, third party underwriters, reinsurers, credit reference agencies, fraud and law prevention agencies, and other companies that provide a service to us or you, to:

- Assess financial and insurance risk
- Recover debt
- Prevent and detect crime
- Develop our products, services, systems and relationships with you
- Understand our customer requirements
- Review our rating and pricing structures

We do not disclose your information to anyone outside of this group except where:

- We have your permission
- We are required or permitted to do so by law

- We have transferred rights and obligations under this agreement

Automated decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if:

- our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions;

or

- you appear to have deliberately hidden your true identity.

You have rights in relation to automated decision making: if you want to know more please contact us using the details below.

Consequences of processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services, goods or financing you have requested, or to employ you, or we may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details below.

Claims and Underwriting Exchange (CUE)

We may search the Claims and Underwriting Exchange (CUE). CUE is a central database of motor, home and personal injury/industrial illness incidents reported to insurance companies, which may or may not give rise to a claim. CUE is managed by not-for-profit company Insurance Database Services Limited (IDSL) on behalf of its member organisations. We will access this database via Experian. CUE holds details of these incidents for six years for motor and home claims and an unlimited time for personal injury claims. We will use the information from CUE to check the claim information provided to us by you to prevent multiple claim frauds and misrepresentation of claim histories.

Driver and Vehicle Licensing Agency (DVLA)

We will, in conjunction with you, contact the Driving and Vehicle Licensing Agency (DVLA). The DVLA maintains the database of drivers and vehicles in Great Britain. We will use the information from the DVLA to verify that you hold a full UK driving licence and to prevent any misrepresentation of driving histories (motoring offences).

Taxi Licensing Authority

If you are a taxi driver wishing to take out an insurance policy with us we will, in conjunction with you, contact your taxi licensing authority. The licensing authority will maintain a database of all drivers licensed to drive a hackney carriage or private hire vehicle within their area. We will use the

information from the licensing authority to confirm that you hold a valid taxi badge and your vehicle holds a valid taxi plate.

Motor Insurance Database (MID)

Information relating to your policy will be added to the Motor Insurance Database (MID) managed by the Motor Insurers' Bureau (MIB). The MID and the data stored on it may be used by certain statutory and/or authorised bodies including the Police, the DVLA, the Insurance Fraud Bureau and other bodies permitted by law for purposes not limited to but including:

- Continuous Insurance Enforcement
- Law enforcement (prevention, detection, apprehension and/or prosecution of offenders)
- The provision of government services and/or other services aimed at reducing the level and incidence of uninsured driving

If you are involved in a road traffic accident (either in the UK, the EEA or certain other territories), insurers and/or the MIB may search the MID to obtain relevant information.

Persons (including his or her appointed representatives) pursuing a claim in respect of a road traffic accident (including citizens of other countries) may also obtain relevant information which is held on the MID.

It is vital that the MID holds your correct registration number. It is important that you check your policy documents ensuring that the registration number is recorded correctly.

If it is incorrectly shown on the MID you are at risk of having your car seized by the Police. You can check that your correct registration number is shown on the MID at www.askMID.com.

If the registration number is not shown correctly on your policy documents, or you cannot find your car on the MID, please contact us immediately.

Sensitive information

In order to provide you with a quote we may need to collect personal data which the Data Protection Act 1998 defines as sensitive, such as medical history or criminal convictions. We will not use such sensitive personal data about you or others except for the specific purpose for which you provide it and to provide the services described in your policy documents. By proceeding with obtaining a quote you will signify your explicit consent to such information being processed by ourselves, the insurer and/or its agents.

Dealing with other people

It is our policy to deal with anyone who calls us on your behalf, provided you have given authority for them to do so and this has been recorded on the policy. Please note that any persons named as drivers on the policy do not automatically have the authority to deal with the policy on your behalf. If you would like someone else to deal with the policy on your behalf on a regular basis please let us know and we will update our records. If at any time you would prefer for us to deal with you only please contact us and we will remove the person's details from our system.

Access to your information

Under the Data Protection Act 1998 you have the right to access your personal information. This is called a Subject Access Request. If you wish to find out what information, if any, we hold – or are processing – that relates to you, please complete a Subject Access Request Form. A charge of £10 is made for such a request.

If any of the information held is inaccurate we will also make any necessary amendments and confirm to you that these have been made.

You are also entitled to ask us to remove personal information from our records. If you wish to do this, then please write to the Data Protection Officer at the contact details below. Please provide your full name, address and date of birth when contacting us.

Data transfers

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Your rights

Your personal data is protected by legal rights, which include your rights to:

- object to our processing of your personal data;
- request that your personal data is erased or corrected;
- request access to your personal data.

For more information or to exercise your data protection rights please, please contact us using the contact details below.

If you are unhappy about how your personal data has been used please refer to our complaints policy. You can do this by contacting our Customer Care department –

www.freewayinsurance.co.uk/contact/. You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data - www.ico.org.uk.

Contact Information

You can write to the Data Protection Officer, at:

Freeway UK Insurance Services Limited,
Unit 2 Abbots Park,
Monks Way,
Preston Brook,
Cheshire,
WA7 3GH.