

# Darwin Privacy Policy

Your privacy is important to Darwin and we go to great lengths to protect it. This Privacy Policy explains how we use your details. You should show this Privacy Policy to all other people covered, or planning to be covered, under your Darwin insurance.

When Darwin asks you for information, the information is needed in order to enter into a contract with you or to take steps to enter into a contract, so if you fail to provide that information, we won't be able to provide you with a quotation or insurance policy.

## Who are we?

In the context of your Darwin policy, iGO4 Ltd and U K Insurance Limited (together "we", "us" or "our") are the data controllers of your personal information. iGO4 Ltd are responsible for the arranging and administering of your Darwin policy and U K Insurance Limited process your information for underwriting and claims fulfilment purposes.

You can contact iGO4 on data privacy matters at [data.protection@igo4.com](mailto:data.protection@igo4.com) or by writing to us at Data Protection Officer, iGO4, iGO4 House, Staniland Way, Peterborough PE4 6JT. Additionally you can contact U K Insurance Limited on data privacy matters in relation to underwriting or claims at Data Protection Officer, U K Insurance Limited, Churchill Court, Westmoreland Road, Bromley, Kent BR1 1DP or alternatively by using this [form](#) or email at [Data.Rights.Requests@directlinegroup.co.uk](mailto:Data.Rights.Requests@directlinegroup.co.uk).

## What information do we collect?

### Information you give us:

- **Identifying and insurance information**

We collect identifying information such as the name, address, email address and date of birth of each person to be insured and insurance information which relates to the vehicle to be insured and your risk profile. This may include criminal conviction information and health information if needed in connection with your policy. We also collect bank account and/or payment card details to arrange payment of your premium.

- **Incidents and claims**

You must tell us about any incident (such as an accident regardless of blame, fire or theft), whether or not you intend to make a claim. We will share information with third parties that are asked to help deal with your claim. This customer information is not sold to any other company. We will share information about your claim with other insurers and place information on industry shared databases and relevant agencies as described below. iGO4 Ltd and U K Insurance Limited may search the databases held by those agencies when you apply for insurance or make a claim.

- **Surveys**

We may invite you to complete surveys. You do not have to complete them but, if you do, you understand that we can use the results of those surveys for the purposes set out in this Privacy Notice.

### Information we get from your use of our services

- **Call recording**

We may record in-bound and out-bound phone calls and use the recordings to prevent fraud, for staff training and for quality-control purposes.

- **Device information**

When you obtain a quote and buy a policy online, your device type, IP address and location and information about your browser, screen resolution and internet service provider are automatically collected and used for fraud prevention checks through a credit reference agency.

- **Cookies**

We and our partners use various technologies including cookies to enhance your online experience. We use these technologies to collect and store information when you visit our websites and customer service portals, and this may include information to identify your browser or device and to analyse web traffic. More information on our use of cookies is provided in our [Cookie Policy](#).

- **Customer engagement information**

When we send you communications such as emails or texts we keep records including the date and time an email is opened, click rates, your device type and your IP address. This information is used for our legitimate interests to help improve customer service and to detect and prevent fraud.

## **Information we get from other sources**

- **Credit searches and data checks**

To ensure we have the necessary facts to assess your insurance risk, verify your identity, prevent fraud and provide you with their best premium, we obtain information from third parties at quotation, renewal and in certain circumstances where policy amendments are requested. This information includes searches from credit reference agencies who will conduct a credit and identity searches, including full electoral roll, public information and previous search records. The credit reference agencies keep a record of that search, which is only visible to you and the credit reference agency. This search does not affect your credit score. A search will be carried out on our behalf by our software house Cheshire Data Systems Limited (CDL) and will be recorded on your credit report in CDL's name. We may ask credit reference agencies to provide a credit scoring computation. Credit scoring uses a number of factors to work out risks involved in any application. A score is given to each factor and a total score obtained.

If you pay by instalments, our premium finance provider Close Brothers Limited trading as Close Brothers Premium Finance will use credit referencing agencies for an affordability credit search for new policies, renewals and in certain circumstances where policy amendments are requested to check you can afford to pay. As this is a hard credit check, your entire credit history will be searched and a mark will be left on your credit report, so whenever prospective lenders look at your credit report, they can see you applied for credit and whether you were accepted. This affordability assessment will take place after you have applied for a credit agreement.

The identities of the credit reference agencies and the ways in which they use and share personal information are explained in more detail at [www.experian.co.uk/crain/](http://www.experian.co.uk/crain/).

- **Price comparison or other introductory services**

If you request a quote using a price comparison or other introductory service, we will receive the information you have provided to that service in order to respond to your request. This is intended to improve your online experience by avoiding the need to re-enter your details.

- **Industry databases**

We check the information you provide, for example claims history against industry databases and get information back from those services, as explained in the Data Verification and Information and Preventing and detecting fraud sections below.

- **Publicly available information**

In assessing any claims made, we may undertake checks against publicly available information (such as electoral roll, county court judgements, bankruptcy or repossessions). We may also use publicly available information to supplement our records.

## How do we use your information?

### General

The information we collect may be used by us, our respective agents and by third parties and reinsurers for the purposes of risk assessment, insurance administration, fraud prevention, payment collection and claims handling as well as for research and statistical analysis to help develop, improve and price our products and services. It may also be used to comply with legal obligations, resolve disputes, enforce agreements and for troubleshooting activities.

### Payment card details

If you have given permission for your card details to be stored, we will use a third party to securely store the payment card details you provide in accordance with industry standards. If you have also given permission for your card details to be stored for future automatic use, we will use the payment card details you provide to us to renew your policy, process refunds and any additional premiums due following changes to your policy, and to collect any charges or outstanding debt. We will advise you of our intention to take payment and give you the opportunity to make alternative arrangements if necessary.

### Security

The personal information you provide is held securely and in confidence by us in our computer systems and other records. When we process your personal information, we do so in compliance with the law. We maintain strict security standards and procedures to prevent unauthorised access to your data. We use technologies, such as data encryption, fire walls and server authentication to protect the security of your details.

### Automated decision-making

When you request a quote, apply for insurance, ask to make changes to your policy and on renewal, we use automated processes to assess insurance risk, to carry out credit, fraud and validation checks as explained elsewhere in this Privacy Policy. These processes are used to check the information you have provided and analyse the likelihood and value of any claims you may make, your ability to pay the insurance premium and the risk of fraud being committed. As a result of these checks, your premium and/or policy terms will be determined or adjusted, or we may not be able to provide you with insurance. If you have any concerns regarding the outcome of these checks, please let us know.

### Keeping in touch

From time to time, we may contact you regarding our products, discounts, offers and services where we believe you will have an interest in the communications. These communications will be sent and displayed to you based on your preferences via email, text messages and post as well as displayed in your social media channels or web browser. If you have told us that you prefer not to be kept informed, we will make sure you are not contacted in this way.

You can let us know at any time if you no longer wish to receive marketing messages by emailing [data.protection@igo4.com](mailto:data.protection@igo4.com). Alternatively, you can contact U K Insurance Limited at U K Insurance Limited, Churchill Court, Westmoreland Road, Bromley, BR1 1DP or by email at [Data.Rights.Requests@directlinegroup.co.uk](mailto:Data.Rights.Requests@directlinegroup.co.uk).

### Legal basis

We are allowed to use and share your information in the ways described in this Privacy Notice:

- So that we can provide you with a quotation at your request and can arrange, provide and administer your policy.
- Where we need to process sensitive information such as health and/or criminal conviction information for insurance purposes, we do so on the permitted basis that it is in the public interest to ensure that insurance is available at reasonable cost through risk-based pricing. We collect and use this information as part of your insurance contract with us, or where it is necessary for a legal obligation, or as part of the establishment or defence of a legal claim.
- So that we can comply with legal and regulatory obligations, such as legal obligations to share information with our Regulators and Ombudsmen or carry out financial sanction checks.
- Where our use of your information is necessary for our legitimate business interests, such as research and statistical analysis and conducting customer surveys.

## With whom do we share your information?

### Service providers and introduction services

We will share your information with our service providers and partners to assist in the administration and performance of our service to you and your insurance policy. If you are referred to us or have bought a policy via a price comparison service or through a third-party intermediary, we may also share your information with them. We use a third party to securely store the payment card details you provide in accordance with industry standards.

### Payment card details

In order to process payments from your debit or credit card, we share your personal, card and transaction details with our payment processing provider, Worldpay. Worldpay acts as a controller of your data under the terms of its own Privacy Notice which can be found on its corporate website.

### If you pay your premium by instalments

If you choose to pay your premium by instalments, this will be via a finance arrangement with our premium finance supplier. We will share your personal, policy and payment details with the finance company to enable them to enter into the credit agreement with you, collect your instalments and administer their service. The finance company will become data controller in respect of the information they process in providing this service.

### Dealing with others on your behalf

At the request of many of our customers, and to make managing your insurance more convenient for you, it is our policy to deal with your spouse or partner who calls us on your behalf, provided they are named on the policy. If you would like to change this arrangement, nominate someone else such as a friend or other family member, or would prefer us to deal only with you, please email or call us to let us know.

### International transfers

The personal information we collect from you may from time to time be processed in (including accessed in or stored in a country or territory outside the United Kingdom, which may not enforce the same level of protection by law or regulation. To safeguard your data, we put in place contractual obligations with third parties, to define technical and organisational measures to provide appropriate protection.

Our agreements may include standard terms called Standard Contractual Clauses or International Data Transfer Agreements (IDTAs) approved by the UK Information Commissioner's Office or may require the other party to be signed up to government standards that are recognised as providing the right level of protection. But it is possible that regardless of what is set out in the agreement this would not stop a government in any part of the world from accessing your personal information, as they can often have power to overrule any agreements we make, for purposes such as crime prevention and national security.

### Other insurers and regulatory bodies

Information may also be shared with other insurers directly or via those acting for the other insurers (such as loss adjusters or investigators). It may be disclosed to regulatory bodies for the purposes of monitoring and/or enforcing our compliance with any regulatory rules and codes.

### Motor Insurance Database

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

- electronic licensing;
- 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 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. 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 details are shown on the MID at [www.askmid.com](http://www.askmid.com).

As a result of the Deregulation Act 2015 coming into effect, a Certificate of Motor Insurance is no longer required to be delivered before a motorist is validly insured. A greater reliance is therefore placed upon the MID for identifying that the relevant cover is in place for a motor vehicle. As such, in order to confirm that you have effective motor insurance for your car, we strongly recommend that you check the MID using the link above. Please note that if you have any communications from us regarding the cancellation of your policy, the MID will be updated in line with such communications.

### **Preventing and detecting fraud**

In order to protect your interests and the interests of the vast majority of our customers, we will fully investigate all fraud and, where fraud is detected, will report to the authorities under the Proceeds of Crime Act (POCA). We may cancel your policy immediately and backdate the cancellation to the date of the fraud. We may also take legal action against you.

In order to prevent and detect crime and fraud we and our agents may at any time:

- share information about you with other organisations and public bodies including the Police;
- record your details on the Insurance Fraud Register (IFR);
- co-operate fully with the Police authorities in the detection and prosecution of those involved in fraud;
- pass information to the Claims and Underwriting Exchange Register and the Motor Insurance Anti-Fraud and Theft Register, run by Motor Insurer's Bureau (MIB Ltd) and other industry databases;
- check and/or file your details with fraud prevention agencies and databases, and if you give us false or inaccurate information and we suspect fraud, we will record this. Please contact us if you want to receive details of the relevant fraud prevention agencies.

The aim is to help insurers to check the information provided and also to prevent fraudulent claims. When your request for insurance is dealt with, the registers will be searched. Under the conditions of your policy, we must be told about any incident regardless of blame (such as an accident or theft) that may or may not give rise to a claim. In the event of a claim the information you supply together with any other information relating to the claim, will be put on the register and made available to participants.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information.

We and other organisations may also access and use this information, from the UK and from overseas, to prevent fraud and money laundering, for example, when:

- checking details on applications for credit and credit related or other facilities;
- managing credit and credit related accounts or facilities and recovering debt;
- checking details on proposals and claims for all types of insurance;
- completing credit searches and additional fraud searches, such as identity checks.

You may report information confidentially in respect of bogus/fraudulent claims to the IFB (Insurance Fraud Bureau) Cheatline on 0800 422 0421. The Cheatline is manned by Crimestoppers 24 hours a day. All information can be reported anonymously and will be treated in the strictest confidence. The Cheatline is manned by experienced fraud investigators who may share the information with other interested parties. Savings obtained from information provided to the Cheatline will help to reduce insurance premiums. More information can be provided if requested.

### **Data Verification and Information**

We share information concerning your request for a quote and your insurance policy with LexisNexis Risk Solutions who help us to check your identity and evaluate your insurance risk, including checking your No Claim Discount. LexisNexis Risk Solutions Limited does this by collecting data about you from public sources (such as the electoral register and insolvency service) and private sources (such as other insurers).

More information on LexisNexis Risk Solutions Limited and how it collects and processes your data, your right to object and your other data protection rights is available here at <https://risk.lexisnexis.com/group/processing-notices/insurance-services>.

### **Credit reference agencies**

We or our premium finance provider may also pass to credit reference agencies information we hold about you and your payment record. Credit reference agencies share information with other organisations, enabling applications for financial products to be assessed or to assist the tracing of debtors, or to prevent fraud. Information about the ways in which the credit reference agencies use and share personal information are explained in more detail on the [Credit Reference Agency Information Notice](#).

### **Debt collection agencies**

We will pass your data, and may assign your debt, to selected debt collection agencies where we have been unable to recover the debt ourselves.

### **Company mergers**

We may need to disclose your information as part of a business merger, sale or acquisition. If we do so, we will ensure that the information is protected by confidentiality commitments and can only be used for the purposes disclosed.

## **How long will we store your information?**

If you purchase a policy from us, we will retain your policy data for the duration of your policy and for seven years afterwards. In exceptional cases we may need to retain your data for longer than this, if for example there is an ongoing claim, in which case we will keep your data for six years after the end of the claim, or if the records relate to someone under the age of 18, or there is a legal or regulatory reason to do so. In the case of a minor, our retention period will not expire earlier than four years after his or her 18<sup>th</sup> birthday. Call recordings are retained for three years. If you obtain a quote from us but decide not to purchase a policy, we will retain your data for up to 3 years from the date of quotation, and then it will be deleted.

## **Your information rights**

- **Access:** you have the right to access information held about you
- **Rectification:** you have the right to rectify any errors or omissions in information held about you.
- **Erasure:** in certain circumstances you will have the right to ask us to erase information we hold about you. We are not required to erase information if we still need it for the purposes for which it was collected or processed, including to maintain records after cancellation or expiry of your policy, or where we have other legal grounds for processing your information.
- **Restrict processing:** where you do not wish your information to be erased, you may instead have the right to ask us to restrict our processing of your information. This right is only available in limited circumstances, such as where you believe the information we hold about you is inaccurate or is being processed improperly. The right would apply during the period that we are checking its accuracy or legality.
- **Portability:** to receive a copy of the personal data you have provided to us, in a commonly used machine-readable format, and to transfer that personal data to another data controller. Where it is technically feasible you also have the right to request us to transfer the data directly to another data controller.
- **Object:** where we are processing your information on the grounds of it being in our legitimate interests to do so, you have the right to object to that processing.
- **Automated decision making and profiling:** where we use automated processing to make a decision which may produce a legal or similarly significant effect on you, you may request human intervention, express your point of view and contest the decision.

In order to exercise your rights, please write to the iGO4 Data Protection Officer at, iGO4 House, Staniland Way, Peterborough, PE4 6JT or use the email address [data.protection@igo4.com](mailto:data.protection@igo4.com). Alternatively for details relating to underwriting or a claim, you can contact U K Insurance Limited at U K Insurance Limited, Churchill Court, Westmoreland Road, Bromley, BR1 1DP or through this [form](#) or by email at [Data.Rights.Requests@directlinegroup.co.uk](mailto:Data.Rights.Requests@directlinegroup.co.uk).

## **Your right to complain**

In addition to your right to complain as set out in our Arrangement Agreement, you also have the right to raise a privacy complaint with the Information Commissioner's Office (ICO), you would usually be expected to approach us first to resolve the matter.

## **Changes**

We may change this Privacy Notice from time to time. Any changes will be updated on [our website](#) and if appropriate notified to you in writing.

Last updated: September 2023