

## PRIVACY NOTICE

Your privacy is important to us and we go to great lengths to protect it. This Privacy Notice explains how we and your insurer may use your details, including those generated by the WiseDriving device. You should show this Privacy Notice to all other people covered, or planning to be covered, under your insurance.

When we ask you for information, we need that information 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 WE ARE

iGO4 Ltd and the insurer of your policy are the data controllers of your personal information. You can contact iGO4 on data privacy matters at [dataprotection@igo4.com](mailto:dataprotection@igo4.com) or by writing to us at **Data Protection Officer, iGO4, iGO4 House, Staniland Way, Peterborough, PE4 6JT**. Your insurer's name and contact details will be provided on your Certificate of Insurance. Further information about how your insurer uses your details may be found on your insurer's website.

## 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. When you tell us about an incident, we will pass information about it to your insurer and relevant agencies, as described below. We and the insurer 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 and your insurer may record in-bound and out-bound phone calls and use the recordings to prevent fraud, for staff training and for quality-control purposes.

- **Driving data**

Under your WiseDriving policy a telematics device (WiseDriving device) will be fitted to your car to assist us to record information about driving behaviour. The information collected via the WiseDriving device and (where applicable the WiseDriving app) includes time, date, location, distance travelled, speed of vehicle, acceleration and deceleration and time spent idle. An electronic data feed will translate the GPS co-ordinates from the WiseDriving device (or app) into a specific location which will provide details regarding road type, road surface and speed limit of the road you or other drivers of your car are driving on at any specific time. This information will be used to build up a profile of how, where and when your car is driven.

- **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](#).

## INFORMATION WE GET FROM OTHER SOURCES

- **Credit searches and data checks**

To ensure we, our insurers and premium finance providers have the necessary facts to assess your insurance risk, verify your identity, prevent fraud and provide you with their best premium and payment options, we, the insurer or the premium finance provider may obtain information from third parties at quotation, renewal and in certain circumstances where policy amendments are requested. This information includes quotation searches from credit reference agencies who will conduct a credit search including full electoral roll, public information and previous search records. The credit reference agencies keep a record of that search, which may be visible to other credit providers. A search will be carried out on our behalf by our software house Cheshire Datasystems Limited (CDL) and will be recorded on your credit report in CDL's name, however searches completed by insurers or premium finance providers may show alternative names. We, the insurer or the premium finance provider 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.

- **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 and your insurer may check the information you provide, for example driving licence details, claims history and no claims discount entitlement against industry databases and get information back from those services, including as explained in the **Preventing and detecting fraud...** section below.

- **Publicly available information**

In assessing any claims made, the insurer 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 WE USE YOUR INFORMATION

### GENERAL

The information we collect may be used by us, your insurer, 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

Unless you have advised otherwise, we (and your premium finance provider if you pay by instalments) 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.

## DRIVING DATA

iGO4 and your insurer will use the WiseDriving device data for the purpose of providing you with your policy and ensuring that you are paying a premium that is reflective of your driving performance and that of any named drivers on your policy. The WiseDriving device data will be used to calculate a driving score which will be displayed online on your WiseDriving Dashboard. We will provide you with log in details for this once the WiseDriving device has been activated. The driving score relates to your car and not to you specifically, so you should be aware of this if other people have permission to drive your car.

Your information, including the WiseDriving device data, will be used for the following purposes:

- to contribute towards the calculation and charging of your insurance premium based upon actual vehicle usage and driving behaviours;
- to help the insurer handle any claims, and reduce fraud, by assisting with the identification, assessment or investigation of claims made and to provide clarification as to the circumstances of the claim;
- if you have a professionally fitted or self-installed WiseDriving device, to provide you with the theft tracking service included in your policy;
- to provide you with any other additional services requiring use of the WiseDriving device which we may offer you and you may agree to take up from time to time;
- to help understand safe driving behaviours which we will use to develop underwriting of this product and to inform development of similar products;
- to validate other information provided by you when buying, adjusting or renewing your policy, including but not limited to where your car is kept and your annual mileage;
- to issue us with crash notifications so we could contact you to offer assistance.

The information collected by the WiseDriving device and some of the information provided by you at the point of application, such as age, gender, marital status, the vehicle registration number, make, model and engine size of your car will also be used by us, your insurer and our respective agents for analysis and research purposes both during the period of insurance and once your policy has ceased.

Following expiry or cancellation of your policy, we will cease to collect data from the WiseDriving device. If you have a professionally installed WiseDriving device, you may ask for it to be removed from your car subject to payment of the administration charge as shown in our Terms and Conditions. If you have a self-installed or 12v WiseDriving device, it may be disposed of by you upon expiry or cancellation and the app uninstalled from your phone.

## 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, and to carry out credit, fraud and validation checks as explained elsewhere in this Privacy Notice. 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. We also use automated decision-making to analyse your driving behaviour and calculate your driving score. 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.

## MARKETING

We'd like to keep you up to date about our own products and services that might be of interest to you. However, if you have indicated that you prefer not to be kept informed, we will make sure you are not contacted in this way. You have the right to change your mind about receiving marketing from us at any time and can do so by emailing [dataprotection@igo4.com](mailto:dataprotection@igo4.com) or writing to **Data Protection Officer, iGO4, iGO4 House, Staniland Way, Peterborough, PE4 6JT.**

## LEGAL BASIS

We and your insurer 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.
- 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 sanctions checks.
- Where our use of your information is necessary for our legitimate business interests, such as marketing of our products and services (unless you ask us not to), research and statistical analysis and conducting customer surveys.

## WITH WHOM DO WE SHARE YOUR INFORMATION?

### PANEL OF INSURERS

When you request a quote and on renewal, we will share your information with all insurers on our panel in order to obtain and return the most competitive quotation available to you.

### SERVICE PROVIDERS AND INTRODUCTION SERVICES

We and your insurer 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.

### 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.

### OPTIONAL EXTRAS

If you buy an optional extra product through us such as breakdown cover or legal expenses cover, we will share the information needed for that product with the product provider and their administrators.

### 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

We and your insurer may transfer personal data to, and process personal data in, a destination outside the European Economic Area subject to appropriate data safeguards to ensure compliance with data protection laws. In most cases this will be by using EU Standard Contractual Clauses which can be viewed at [http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm).

## 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 and your insurer's compliance with any regulatory rules and codes.

## DRIVING DATA

We will disclose information collected by the WiseDriving device in the following circumstances:

- where you have provided your agreement;
- to our agents and suppliers for operational reasons and for the processing and analysis of WiseDriving device data, including for research purposes;
- if we are required by law to disclose the information, such as to regulators or to the Police. We will not pass the WiseDriving device data to the Police unless required to do so.

## 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, your insurer will fully investigate all claims and, where fraud is detected, will report to the authorities under the Proceeds of Crime Act (POCA).

Your insurer may cancel your policy immediately and backdate the cancellation to the date of the fraud. It may also take legal action against you.

In order to prevent and detect crime and fraud we, your insurer and our respective 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), although we will not pass data generated by your Wisedriving device to the Police unless required to do so;
- 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, run by Motor Insurer's Bureau (MIB Ltd), the Motor Insurance Anti-Fraud and Theft Register, run by the Association of British Insurers (ABI), 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 a driving licence check.

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 such as the insurer concerned (if known). Savings obtained from information provided to the Cheatline will help to reduce insurance premiums. More information can be provided if requested.

### **CREDIT REFERENCE AGENCIES**

We, the insurer or the 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 may 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 or your insurer 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, or if the records relate to someone under the age of 18. In the case of a minor, our retention period will not expire earlier than seven years after his or her 18th 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 7 years from the date of quotation, and then it will be deleted.

## YOUR INFORMATION RIGHTS

You have the right to access information held about you, on written request, and if necessary to rectify any errors or omissions in that information. Please write to the **Data Protection Officer** at **iGO4, iGO4 House, Staniland Way, Peterborough, PE4 6JT**. If we receive repeated requests from you, we reserve the right to charge a fee for this.

You have the right to tell us that you no longer agree for us to tell you about our products and services which may be of interest (direct marketing).

You have the following additional rights in respect of your personal information:

- **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 may 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 these rights, please write to the **Data Protection Officer** at the address given above or use the email address [dataprotection@igo4.com](mailto:dataprotection@igo4.com).

## YOUR RIGHT TO COMPLAIN

In addition to your right to complain as set out in our Terms and Conditions, you also have the right to raise a privacy complaint with the **Information Commissioner's Office** (ICO). The ICO will usually require you to have approached us first to try 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: 1st May 2018