

Privacy notice - How we use personal information

Introduction

This notice explains how we collect, use and store personal information. Your privacy and personal information are important to us and we are committed to keeping it protected. We've tried to make this notice as clear and transparent as possible, so you are confident about how we use your information. As data controller, we are responsible for decisions about how your information will be processed and managed. You will also find details regarding your rights under data protection laws and how to contact us.

Who we are and whose personal information we collect

When we refer to "we", "us" and "our" in this notice it means Premierline Limited trading as Premierline or Complete Insure.

It also includes where relevant to your insurance application, policy or claims the insurers who underwrite your cover. For more information please visit www.premierline.co.uk or www.completeinsure.co.uk.

When we say, "you" and "your" and "individuals" in this notice, we mean anyone whose personal information we may collect, including:

- anyone seeking an insurance quote from us or whose details are provided during the quotation process
- policyholders and anyone named on or covered by the policy
- anyone who may benefit from or be directly involved in the policy or a claim, including claimants and witnesses
- anyone who has a business relationship or transacts business with us or provides us with a service, such as other brokers and intermediaries.

How we use personal information

We use personal information in the following ways:

- to provide quotes, administer policies and policyholder claims to fulfil our contract
- to administer third party claims, deal with complaints and prevent financial crime to meet our legal obligations
- to send marketing information about the products and services we provide if we have received your specific consent.

We also use personal information for the legitimate needs of our business. This includes, but is not limited to:

- managing our business
- conducting market research and enhancing customer service
- managing our relationships with business partners
- developing and improving our administration, security services and insurance applications
- providing a service that keeps our customers and suppliers safe by identifying vulnerability to better meet their needs
- we share your information with insurers when you submit an insurance application and or claim for the purposes of fraud detection and prevention.

How we use personal information (continued)

There is no obligation to provide us with personal information, but we cannot provide products and services without it.

Anyone whose personal information we hold has the right to object to us using it.

They can do this at any time by telling us and we will consider the request and either stop using their personal information or explain why we are not able to. Further details can be found below.

Marketing

We may use an individual's personal information to market products and services to them. Our marketing activities may include:

- providing information about products and services by telephone, post, email and SMS; we will either do this ourselves or use third party partners to do it for us
- working with selected partners to display relevant online advertisements, and to our other customers, on third party websites and social media platforms. To do this, we may provide our partners with an individual's personal information in an encrypted format, which they use only to identify the appropriate audiences for our advertisements. We ensure that our partners delete this information once the advertisement audiences have been identified, and do not use the information for their own purposes
- working with our marketing partners who help us analyse how you access our products and services, so that we can improve how we deliver them to you.

If you do not wish to receive marketing information about our products and services you can tell us at any time by using the contact details found in your policy documentation.

Automated decision making, including profiling

We may use automated decision making, including profiling, to assess insurance risks, detect fraud, and administer your policy. This helps us decide whether to offer insurance, determine prices and validate claims.

Anyone subject to an automated decision has the right to object to it. To do so please contact us via email at service@premierline.co.uk and we will review the decision.

The personal information we collect

The information we collect will depend on our relationship with you. We collect the following types of personal information so we can complete the activities as detailed in the section 'How we use personal information':

- basic personal details such as name, age, contact details and gender
- family, lifestyle and social circumstances, such as marital status, dependants and employment type
- financial details such as direct debit or payment card information
- photographs and/or video, including surveillance to help us manage policies and assess claims

Privacy notice - How we use personal information (continued)

The personal information we collect (continued)

- tracking and location information if it is relevant to the insurance policy or claim
- identification checks and background insurance risk details including previous claims information
- information collected from your devices relating to your use of our websites, including via the use of cookies (see section 'Where we collect personal information' below)
- accessibility details if we need to make reasonable adjustments to help
- business activities, such as goods and services offered.

In certain circumstances, we may request and/or receive special category or sensitive information about you. We would only collect this information if it is relevant to the insurance policy or claim or where it is necessary for a legal obligation:

- your current or former physical or mental health
- criminal offences, including alleged offences, criminal proceedings, outcomes and sentences (previous criminal convictions, bankruptcies and other financial sanctions such as County Court Judgements).

Where we collect personal information

We collect personal information direct from individuals, their representatives or from information they have made public, for example, on social media.

We also collect personal information from other persons or organisations, for example:

- credit reference and/or fraud prevention agencies
- emergency services, law enforcement agencies, medical and legal practices
- insurance industry registers and databases used to detect and prevent insurance fraud, for example, the Motor Insurance Database (MID), the Motor Insurers Anti-Fraud and Theft Register (MIAFTR) and the Claims and Underwriting Exchange (CUE)
- insurance investigators and claims service providers
- insurers or service providers who underwrite the insurance or provide the services for our products
- other involved parties, for example, claimants, witnesses or business partners
- other Beyond Doubt Holdings Limited companies.

Cookies and similar technologies

We use technology on our website, apps and emails, such as the use of cookies, small text files on our website, or pixels within emails. We use cookies and similar technologies in order to:

- provide online services
- enhance your online experience
- help to prevent fraud
- enhance online security of your data

Where we collect personal information (continued)

- deliver content when you are browsing elsewhere
- help us understand how our website, apps and emails can be improved
- to gain insights into the performance of our email campaigns by determining whether an email was delivered and accessed.

We don't store any contact details or banking information. Please refer to our [Cookie Policy](#) for more detail and to manage your cookie preferences.

Sharing personal information

We only share your information when necessary for the purposes stated in the section 'How we use your personal information.'

We may share personal information with:

- other Beyond Doubt Holdings Limited companies.
- credit reference, fraud prevention and other agencies that carry out certain activities on our behalf, for example, the Motor Insurance Database (MID) and the Insurance Fraud Bureau (IFB) and marketing agencies if agreed
- our approved suppliers to help deal with claims or manage our benefit services, for example; vehicle repairers, legal advisors, loss adjusters, premium finance companies, risk surveyors and risk management support providers
- insurers, third party underwriters, reinsurers, insurance intermediaries, regulators, law enforcement, the Financial Ombudsman Service (FOS); and other companies that provide services to us or you, for example, the Employers Liability Tracing Office (ELTO) and the Claims and Underwriting Exchange (CUE) and network organisations of which you are a member
- providers of data services and data analysts who support us with developing our products and enhancing customer service and experience
- external agencies for market research purposes
- any organisation where you have agreed for them to receive that data as part of the terms and conditions of your membership or affiliation
- third parties in connection with the sale, transfer or disposal of our business.

Transferring personal information outside the UK

We, or third parties acting on our behalf, may need to transfer personal information outside of the UK. In such cases as this is necessary, we shall ensure that any transfer of personal information has adequate safeguards in place to protect your data and privacy rights. Where we transfer to suppliers outside the UK, we ensure that contractual obligations are put in place to maintain the equivalent levels of data protection as we would administer.

For more information about data transfers and the safeguards we have in place, please contact our Data Protection Officer using the details in the section "Data Protection Officer contact details".

Privacy notice - How we use personal information (continued)

How long we keep personal information

We keep information only for as long as we need it to administer the policy, manage our business or as required by law or contract.

Know your rights

Any individual whose personal information we hold has a number of rights in relation to how that information is processed by us. You have the following rights:

- **The right to object** – individuals can object to us processing their data and we will either agree to stop processing or explain why we are unable to
- **The right of access** – individuals can request a copy of their personal information we hold, subject to certain exemptions (a subject access request)
- **The right of rectification** – individuals can ask us to update or correct their personal information to ensure its accuracy
- **The right to erasure** – individuals can ask us to delete their personal information from our records if it is no longer needed for the original purpose
- **The right of restriction** – individuals can ask us to restrict the processing of their personal information in certain circumstances
- **The right to data portability** – individuals can ask for a copy of their personal information, so it can be used for their own purposes
- **The right to withdraw consent** – individuals can ask us, at any time, to stop processing their personal information, if the processing is based only on individual consent

Know your rights (continued)

- **The right to make a complaint** – individuals can complain if they feel their personal information has been mishandled. We encourage individuals to come to us in the first instance but they are entitled to complain directly to the Information Commissioner's Office (ICO) www.ico.org.uk

If you wish to exercise any of these rights you can tell us by using the contact information found within your Terms of Business Agreement which you received with your policy documentation.

Data Protection Officer contact details

Any queries about how we use personal information should be addressed to our Data Protection Officer:

Call: 0330 102 6174

Email: questions@premierline.co.uk

Address:

Data Protection Officer
Premierline
Lancaster Business Park
4 Mannin Way
Lancaster
LA1 3SW

Changes to our Privacy Notice

Occasionally it may be necessary make changes to this notice. When that happens we will provide an updated version at the earliest opportunity. The most recent version will always be available on our website www.premierline.co.uk.