

PRIVACY STATEMENT

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including your **personal data**, needs to be shared between different **insurance market participants**. The insurance market is committed to safeguarding that information.

At ZIS Ltd, we take safeguarding your personal information very seriously and comply with the requirements of the **General Data Protection Regulation**, 25th May 2018.

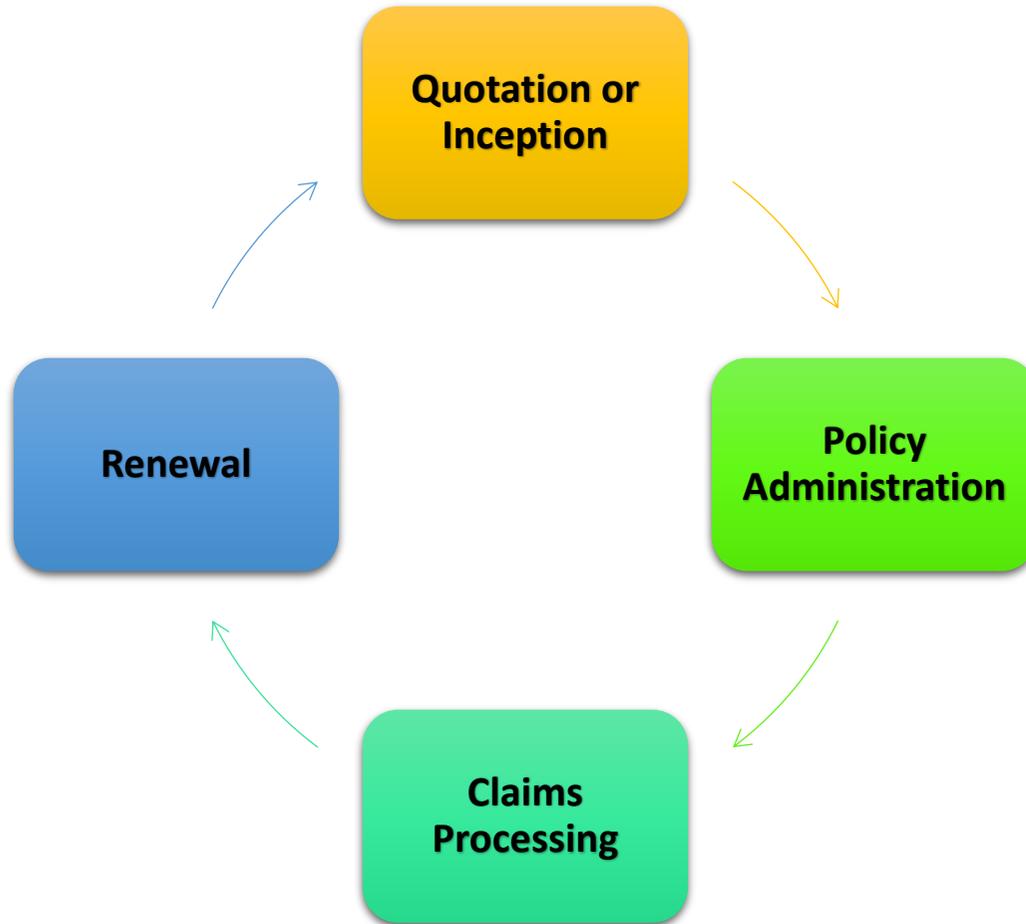
Our Privacy Statement is designed to help you understand how the **insurance market participants** process your **personal data** through the **insurance lifecycle** and may be updated from time to time.

There are terms in bold with specific meanings. Those meanings can be found in the attached Glossary.

This notice sets out the following:

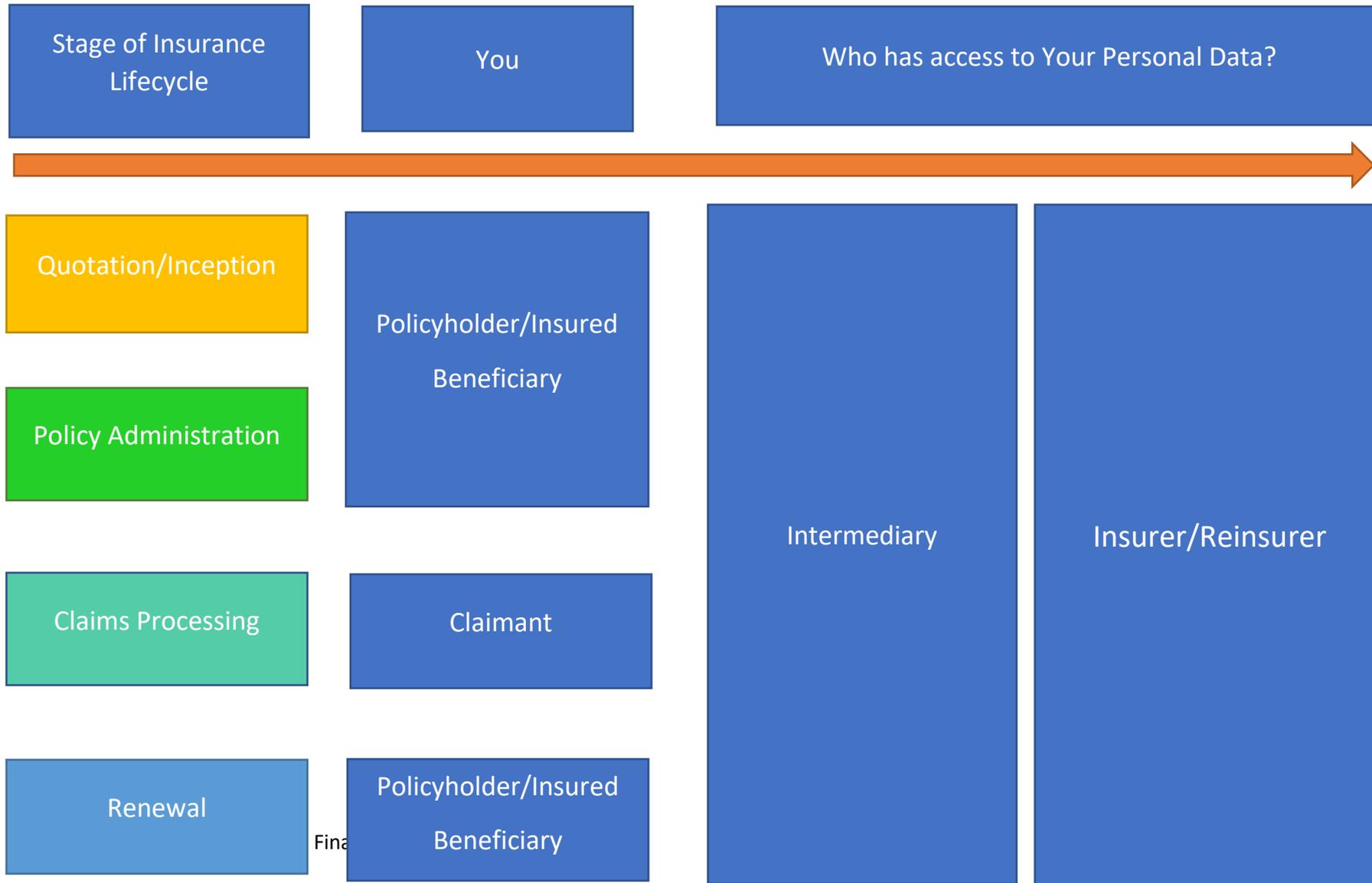
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SECTION 1 INTRODUCTION – HOW THE INSURANCE MARKET WORKS



The Insurance Life Cycle

FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE



SECTION 2 THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

In order for us to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, we need to collect and process personal data about you. The types of personal data that are processed may include:

Types of Personal Data	Details
Individual details	▶ Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Identification details	▶ Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number
Financial information	▶ Bank account or payment card details, income or other financial information
Risk details	▶ Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data .
Policy information	▶ Information about the quotes you receive and policies you take out.
Credit and anti-fraud data	▶ Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you .
Previous and current claims	▶ Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports.
Special categories of personal data	▶ Certain categories of personal data which have additional protection under the GDPR . The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation

SECTION 3 WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

We might collect your personal data from various sources, including:

- **you** or **your** family members, employer or representative;
- other **insurance market participants**;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as the DVLA and HMRC;
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers.

Which of the above sources apply will depend on **your** particular circumstances.

SECTION 4 IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS

The **insurance lifecycle** involves the sharing of **your personal data** between **insurance market participants**, some of which **you** will not have direct contact with. In addition, **your personal data** may not have been collected directly by an **insurance market participant**.

You can find out the identity of the initial **data controller** of **your personal data** within the insurance market life-cycle in the following ways:

- *Where you took out the **insurance policy yourself**:* ZIS Ltd will be the initial **data controller** and our **data protection contact** can advise you on the identities of other **insurance market participants** that we have passed your **personal data** to.
- *Where your employer or another organisation took out the policy for your benefit:* **you** should contact **your** employer or the organisation that took out the policy. They will then confirm that you can approach us directly. Our **data protection contact** can then advise you on the identities of other **insurance market participants** that we have passed your **personal data** to.
- *Where you are not a policyholder or an insured:* **you** should contact the organisation that collected **your personal data** who should provide you with details of the relevant **participant's data protection contact**.

SECTION 5 THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS OF OUR PROCESSING OF YOUR PERSONAL DATA

We set out below the purposes **insurance market participants** might use **your personal data** for.

Purposes

- **Quotation/Inception:**
 - Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
 - Evaluating the risks to be covered and matching to appropriate **insurance policy/ premium**
 - Payment of premium where the **insured/policyholder** is an individual
- **Policy administration:**
 - Client care, including communicating with you and sending you updates
 - Payments to and from individuals
- **Claims Processing:**
 - Managing **insurance** and **reinsurance** claims
 - Defending or prosecuting legal claims
 - Investigating or prosecuting fraud
- **Renewals:**
 - Contacting the **insured/policyholder** to renew the **insurance policy**
 - Evaluating the risks to be covered and matching to appropriate **insurance policy/ premium**
 - Payment of premium where the **insured/policyholder** is an individual
- Other purposes outside of the **insurance lifecycle** but necessary for the provision of insurance throughout the **insurance lifecycle** period:
 - Complying with our legal or regulatory obligations
 - General risk modelling
 - Transferring books of business, company sales & reorganisations

Please note that in addition to the disclosures we have identified against each purpose, we may also disclose **personal data** for those purposes to our service providers, contractors, agents and group companies that perform activities on our behalf.

SECTION 6 CONSENT

In order to provide insurance cover and deal with insurance claims in certain circumstances **insurance market participants** may need to process **your special categories of personal data**, such as medical and criminal convictions records, as set out against the relevant purpose.

Your consent to this processing may be necessary for the insurance market participant to achieve this.

You may withdraw your consent to such processing at any time. If you withdraw your consent however, this will impact our ability to provide insurance or pay claims.

SECTION 7 PROFILING AND AUTOMATIC DECISION MAKING

When calculating insurance premiums **insurance market participants** may compare **your personal data** against industry averages. **Your personal data** may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure premiums reflect risk.

Profiling may also be used by **insurance market participants** to assess information you provide to understand fraud patterns.

Where **special categories of personal data** are relevant, such as past motoring convictions for motor insurance, **your special categories of personal data** may also be used for profiling.

Insurance market participants might make some decisions based on profiling and without staff intervention (known as automatic decision making). **Insurance market participants** will provide details of any automated decision making they undertake without staff intervention in their information notices [and upon request] including:

- where they use such automated decision making
- the logic involved
- the consequences of the automated decision making
- any facility for **you** to have the logic explained to **you** and to submit further information so the decision may be reconsidered.

SECTION 8 RETENTION OF YOUR PERSONAL DATA

We will keep **your** personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either **you** or **we** may wish to bring a legal claim under this insurance, or where **we** are required to keep **your personal data** due to legal or regulatory reasons.

SECTION 9 INTERNATIONAL TRANSFERS

We may need to transfer **your** data to **insurance market participants** or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the **GDPR**.

If **you** would like further details of how **your personal data** would be protected if transferred outside the EEA, please contact **our data protection contact**.

SECTION 10 YOUR RIGHTS AND CONTACT DETAILS OF THE ICO

If you have any questions in relation to **our** use of **your personal data**, you should first contact **our data protection contact**.

Our Data Protection Contact details are as follows:

David Zorab, CEO

Zorab Insurance Services Ltd
Mead Mill, 77 Mill Lane, Romsey, Hampshire
SO51 8EQ
United Kingdom

Tel +44 (0) 1794 323 917
Fax +44 (0) 1794 512 982
Mobile +44 (0) 7887 653 240

www.zis.co.uk

Under certain conditions, **you** may have the right to require **us** to:

- provide **you** with further details on the use **we** make of **your personal data/special category of data**;
- provide **you** with a copy of **the personal data** that **you** have provided to **us**;
- update any inaccuracies in the **personal data we** hold;
- delete any **special category of data/personal data** that **we** no longer have a lawful ground to use;
- where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing;
- object to any processing based on the legitimate interests ground unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights; and
- restrict how **we** use **your personal data** whilst a complaint is being investigated.

In certain circumstances, we may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

YOUR RIGHT TO COMPLAIN TO THE ICO

If **you** are not satisfied with **our** use of **your personal data** or **our** response to any request **by you** to exercise any of **your** rights in SECTION 10, or if you think that we have breached the **GDPR**, then you have the right to complain to the **ICO**. Please see below for contact details of the **ICO**.

England	Scotland	Wales	Northern Ireland
Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF	Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HL	Information Commissioner's Office 2nd floor Churchill House Churchill way Cardiff CF10 2HH	Information Commissioner's Office 3rd Floor 14 Cromac Place Belfast BT7 2JB
Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate) Email: casework@ico.org.uk	Tel: 0131 244 9001 Email: scotland@ico.org.uk	Tel: 029 2067 8400 Email: wales@ico.org.uk	Tel: 0303 123 1114 (local rate) or 028 9027 8757 (national rate) Email: ni@ico.org.uk

SECTION 11: GLOSSARY

Key insurance terms:

Beneficiary is an individual or a company that an **insurance policy** states may receive a payment under the insurance policy if an insured event occurs. A beneficiary does not have to be the insured/policyholder and there may be more than one beneficiary under an insurance policy.

Claimant is either a **beneficiary** who is making a claim under an **insurance policy** or an individual or a company who is making a claim against a **beneficiary** where that claim is covered by the **insurance policy**.

Claims processing is the process of handling a claim that is made under an insurance policy.

Quotation is the process of providing a quote to a potential **insured/policyholder** for an **insurance policy**.

Inception is when the **insurance policy** starts.

Insurance is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression **insurance** may also mean **reinsurance**.

Insurance policy is a contract of insurance between the **insurer** and the **insured/policyholder**.

Insurance market participant(s) or participants: is an **intermediary, insurer** or **reinsurer**.

Insured/policyholder is the individual or company in whose name the **insurance policy** is issued. A potential insured/policyholder may approach an **intermediary** to purchase an insurance policy or they may approach an insurer directly or via a price comparison website.

Insurers: (sometimes also called underwriters) provide insurance cover to **insured/policyholders** in return for premium. An **insurer** may also be a **reinsurer**.

Intermediaries help **policyholders** and **insurers** arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through **intermediaries**.

Lloyd's: many policies are underwritten in Lloyd's of London. Lloyd's is a specialist insurance market place. To find out more about how Lloyd's operates please visit their website, <https://www.lloyds.com/about-lloyds>

Policy administration is the process of administering and managing an **insurance policy** following its **inception**.

Premium is the amount of money to be paid by the **insured/policyholder** to the **insurer** in the **insurance policy**.

Reinsurers provide insurance cover to another **insurer** or **reinsurer**. That insurance is known as reinsurance

Renewal is the process of the **insurer** under an **insurance policy** providing a **quotation** to the **insured/policyholder** for a new **insurance policy** to replace the existing one on its expiry.

We, us or our refers to the relevant **insurance market participant**.

You or your refers to the individual whose personal data may be processed by an insurance market participant. **You** may be the insured, beneficiary, claimant or other person involved in a claim or relevant to an insurance policy.

Key data protection terms:

Data Controller: A controller determines the purposes and means of processing **personal data**. A **data controller** is responsible for ensuring that **data processors** comply with GDPR requirements.

Data Processor: is responsible for processing **personal data** on behalf of a **data controller**.

Data Protection Contact: is responsible for helping you if you have any questions in relation to **our** use of **your personal data**. Contact details are included under Section 10.

GDPR: is the EU General Data Protection Regulation and the new UK Data Protection Act, which replaces the UK Data Protection Act 1998 from 25 May 2018.

ICO: Information Commissioner's Office.

Insurance Lifecycle: describes the process from quotation through to the renewal of the policy, usually 12 months later. See Section 1 for more details.

Personal Information or Personal Data: may include individual details, identification details, financial information, risk details, policy information, credit and anti-fraud data, previous and current claims, special categories of personal data. See Section 2 for examples.

Special Categories of Personal Data: Certain categories of **personal data** which have additional protection under the **GDPR**. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation.