

Section 1 – The data we may collect about you

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. For certain types of policy, this could also include telematics 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 Data Protection Legislation. 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 2 – Where we might collect your personal data from

LIM Group is committed to protecting your and your family's personal information.

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

- you;
- 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;
- open electoral register; or
- 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 claim handlers;
- purchasing a product underwritten or administered by LIM Group from us or one of our partners;
- using our website and apps;
- telephoning, texting writing by post or email, or communicating via online channels, such as online chat, to LIM Group.

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

Section 3 – 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:** the insurer and, if purchased through an intermediary, the intermediary will be the initial data controller and their data protection contact can advise you on the identities of other insurance market participants that they have passed your personal data to.
- **Where your employer or another organisation took out the policy for your benefits:** you should contact your employer or the organisation that took out the policy who should provide you with details of the insurer or intermediary that they provided your personal data to and you should contact their data protection contact who can advise you on the identities of other insurance market participants that they 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.

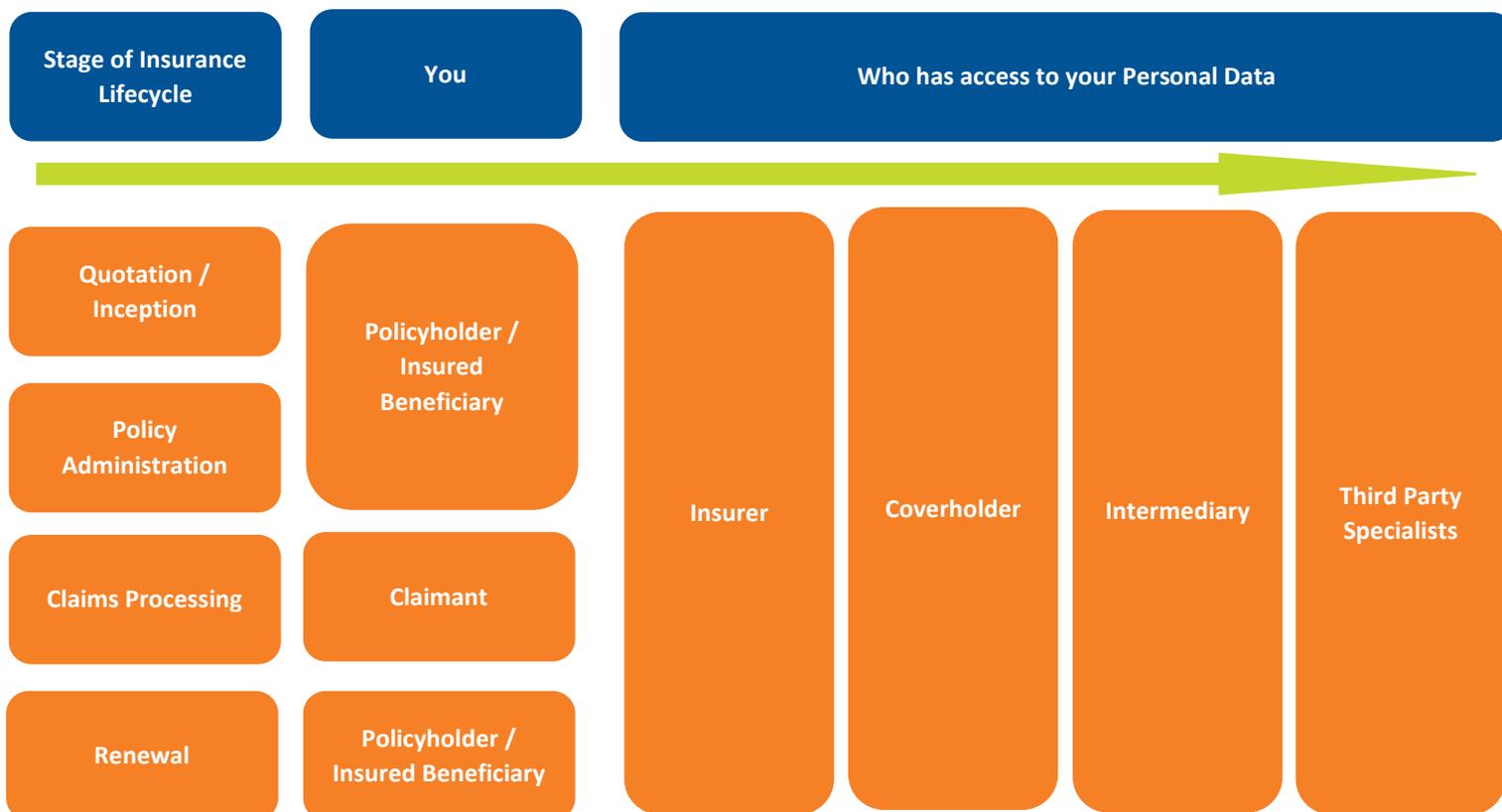
Section 4 – Consent

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. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.

Section 5 – Your personal data in the insurance lifecycle



Section 6 – 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.

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 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
- Investigation or prosecuting fraud

Renewals:

- Contacting the insured/policyholder to renew the insurance policy
- Evaluating the risks to be covered and matching to appropriate 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 and 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 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 medical history for life insurance or 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 an 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 – Internal 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 Data Protection Legislation.

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

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 the data protection contact of the relevant participant. 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)

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Your right to complaint 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 Data Protection Legislation, 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 2 nd Floor Churchill House Churchill Way Cardiff CF10 2HH	Information Commissioner's Office 3 rd Floor 14 Cromac Place Belfast BT7 2JB
Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)	Tel: 0131 244 9001	Tel: 029 2067 8400	Tel: 0303 123 1114 (local rate) or 028 9027 8757 (national rate)
Email: casework@ico.org.uk	Email: scotland@ico.org.uk	Email: wales@ico.org.uk	Email: ni@ico.org.uk

Insurance Market Core Uses Information Notice hosted on the website of a UK insurance industry association, the Lloyd's Market Association (the LMA Notice). LEGAL insurance management use of Personal Data is consistent with the LMA Notice.