

# M&S CAR INSURANCE

## Privacy Overview

### Who are the data controllers?

BISL Limited is the insurer of M&S Car Insurance. BISL Limited collects and uses personal information about you so that they can provide you with a policy that suits your insurance needs. Some of this information may be collected directly from you and some may be collected from other sources including M&S Bank (a trading name of Marks & Spencer Financial Services plc), for example, during the sale of the policy. BISL Limited (Pegasus House, Bakewell Road, Orton Southgate, Peterborough, PE2 6YS) is the data controller in respect of your personal information that it has received from M&S Bank, as distributor, and also in respect of any information that it has collected directly from you or from other sources as set out in its Privacy Notice.

M&S Bank (a trading name of Marks & Spencer Financial Services plc), Kings Meadow, Chester CH99 9FB, is responsible for the promotion and distribution of your M&S Car Insurance. M&S Bank will collect and use personal information about you during the promotion and sale of the product which may be provided by you but could also include information that we have previously collected about you, e.g. any information held about you as a banking customer. M&S Bank is the data controller for this information which will be shared with BISL Limited as set out in its Privacy Notice.

### AN OVERVIEW OF HOW M&S BANK WILL COLLECT AND USE YOUR INFORMATION

M&S Bank will share your personal information with BISL Limited to enable BISL Limited to provide you with a quote, administer your policy and manage your claims. If you make a claim, any information you give to us, or to BISL Limited, may be put in a register of claims database and it may be shared with other insurers to prevent fraudulent claims.

Please read an overview of our Privacy Notice below. You can access the full Privacy Notice at [marksandspencer.com/bankprivacynotice](https://marksandspencer.com/bankprivacynotice) or by writing to: M&S Bank, Kings Meadow, Chester, CH99 9FB.

This provides an overview of:

- the types of information we collect about you
- how we collect and use it
- who we might share it with
- the steps we'll take to make sure it stays private and secure.

We'll also explain your rights to your information. This is just an overview of some key points. A full description is contained in the Privacy Notice which you can obtain by visiting [marksandspencer.com/bankprivacynotice](https://marksandspencer.com/bankprivacynotice) or by writing to: M&S Bank, Kings Meadow, Chester, CH99 9FB

### Who we are

When we say 'we', we mean M&S Bank who is the data controller for your M&S Car Insurance. The data controller is responsible for deciding how your information is used and ensuring it is private and secure.

M&S Bank is a trading name of Marks & Spencer Financial Services plc. Registered in England No. 1772585. Marks & Spencer Financial Services plc is entered in the Financial Services Register. Registration No. 151427. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

M&S Bank is part of the HSBC Group of companies.

### The information we collect

We collect information about you from different places including:

- directly from you
- from a third party acting on your behalf e.g. an intermediary or broker
- from other HSBC companies
- from Marks and Spencer plc
- from publicly available sources
- when we generate it ourselves
- from other organisations.

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you apply for, currently hold or have held in the past.

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Marks and Spencer Unit Trust Management Limited. Registered in England No. 2253009. Marks and Spencer Unit Trust Management Limited is entered in the Financial Services Register. Registration No. 141662. Authorised and regulated by the Financial Conduct Authority.

Marks and Spencer Savings and Investments Limited. Registered in England No. 2588424. Marks and Spencer Savings and Investments Limited is entered in the Financial Services Register. Registration No. 155226. Authorised and regulated by the Financial Conduct Authority.

The registered office of the above companies is Kings Meadow, Chester CH99 9FB. The above companies are part of the HSBC Group. Marks & Spencer is a registered trademark of Marks and Spencer plc and is used under licence. ©Marks & Spencer Financial Services plc 2018. All rights reserved.

You're responsible for making sure you give us accurate and up-to-date information. If you provide information for another person on your account, you'll need to tell them how to find the Privacy Notice and make sure they agree to us using their information for the purposes set out in it.

### How we'll use your information

We'll use it to provide any products and services you've requested and for other purposes, for example:

- to confirm your identity and address
- to understand how you use your accounts
- to carry out your instructions
- to improve our products and services
- to offer you other services we believe may benefit you unless you ask us not to.

We'll only use your information where we're allowed to by law e.g. carrying out an agreement we have with you, fulfilling a legal obligation, because we have a legitimate business interest or where you agree to it.

We may use automated systems to help us make credit decisions as well as carrying out fraud and money laundering checks.

### Who we can share your information with

M&S Bank will share your personal information with BISL Limited to enable BISL Limited to provide you with a quote, administer your policy and manage your claims. If you make a claim, any information you give to us, or to BISL Limited, may be put in a register of claims database and it may be shared with other insurers to prevent fraudulent claims.

We may share your information with other HSBC Group members and any subcontractors, agents, or service providers who work for us or other HSBC Group companies as well as Marks and Spencer plc. We may also share your information with others outside of the HSBC Group e.g. regulators, insurers, other financial institutions, brokers, agents as well as credit reference and fraud prevention agencies.

### Sensitive information

When you apply for insurance, you may need to give us sensitive health information if the insurer needs this to give you a quote. We will keep this information secure and process it in accordance with relevant laws and regulations. Where appropriate, we will ask for consent to collect and use this information.

### How long we'll keep your information

We'll keep your information for as long as you have a relationship with us. After it ends, we'll keep it where we may need it for our legitimate purposes e.g. to help us respond to queries or complaints, or for other reasons e.g. fighting fraud and financial crime and responding to requests from regulators.

### Transferring your information overseas

Your information may be transferred and stored in countries outside the European Economic Area (EEA), including some that may not have laws that provide the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection.

### Your rights

You have a number of rights relating to your information e.g. to see what we hold, to ask us to share it with another party, to ask us to update incorrect or incomplete details, to object to or restrict processing of it, to make a complaint etc.

For a fuller statement of your rights and how to complain if you're unhappy with anything you think we are doing, please see the full Privacy Notice.

### More information

If you'd like more details about anything covered in this summary, please see our full Privacy Notice. You can view or download a copy by visiting [marksandspencer.com/bankprivacynotice](https://marksandspencer.com/bankprivacynotice) or if you prefer paper, give us a call on 0345 900 0900 and we'll send you one in the post.

## HOW WILL BISL LIMITED COLLECT AND USE YOUR INFORMATION

### Who is processing your data?

We are BISL Limited, we arrange and administer M&S Car Insurance and we are the data controller of the personal data that you provide on this website and/or that we collect from you. This means that we are the company responsible for deciding how your data is processed.

BISL Limited is part of the BGL Group of Companies and provides products and services under various brands. If you want to know more about the BGL Group of Companies and the brands that BISL operates you can find out more at [www.bglgroup.co.uk](http://www.bglgroup.co.uk).

We will share data relating to your quote or policy with Marks & Spencer Financial Services plc, who will also be a data controller of this data.

We take our data protection obligations very seriously and it is important to us that you understand how we use your personal data. This Privacy Policy sets out in detail the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else that we think it is important for you to know.

The main purpose for which we process your personal data is to provide you with services that you request from us. We may need some information from you about health or criminal convictions to do this. We cannot provide you with quotes or policies without this data. We will also process personal data for other purposes, such as marketing (where you have consented), market research and fraud prevention. We will only ever keep your personal data for as long as is necessary for the purpose for which we need that personal data.

We will need to share some of your personal data with some third parties, for example insurers and suppliers, and we will make checks against various databases to verify the information you provide and to help us assess your quote. Some of the decisions that we make in relation to our relationship with you will be made by wholly automated means. These decisions can be reviewed if you ask us to, but this does not necessarily mean that they will be changed.

You have various rights in relation to your personal data which can be exercised by contacting us using the details set out in this Privacy Policy.

### CAR INSURANCE

To provide you with car insurance, we need to share your data with the insurers we work with. This is to allow the insurers to consider your application for insurance and to allow them to deal with any claims you make on your insurance policy. The insurers will also be data controllers in relation to the data they receive from us and any additional data the insurer may collect about you when dealing with a claim. This means that the insurers are in charge of how they handle your data and we are not responsible for this. Your insurer is set out in your Schedule of Insurance.

When you choose to add an additional product to your insurance policy, such as breakdown cover, we will also need to share your data with the supplier of the additional product to allow it to be provided.

### You can find further information in the terms and conditions for each additional product.

If you pay for your policy by monthly instalments you will be taking out a credit agreement. Your credit arrangement will be provided by BFSL Limited, which is part of the BGL Group of Companies and which provides credit arrangements on our behalf. Data relevant to your credit agreement will be shared with BFSL Limited. BFSL Limited will also be a data controller of this data and will be responsible for how that data is processed.

If you purchase a policy via a cash back site, some data may also be shared in relation to this for example to confirm your purchase. For more information you'll need to read the privacy policy for the relevant cash back website.

### WHERE DO WE GET THE DATA FROM?

#### From you

Most of the data that we process will be data that we collect from you directly when you request a quote. We will ask you various questions to collect the data we need for the purpose of your policy. We will not be able to provide a quote unless you answer the mandatory questions.

#### From M&S Insurance

If you have previously held any products or services with M&S then we may carry out checks against data that M&S already hold on you. This includes data that may be needed to apply any discounts or offers that you may be entitled to from time to time as an existing customer, for fraud prevention, research and analysis and to help us assess your application for insurance. We may do this when you request a quote, when changes are made to your policy or when your policy is due for renewal.

#### From your use of our website and services

We also collect data about you based on your actions, for example we collect data about how and when you use our websites, or our services so that we can build up a picture of you as a customer. This can include information such as how many quotes you have obtained for insurance from us, mouse clicks/taps, mouse movements, page scrolling and text entered into forms. This helps us to provide you with a good service and to design improvements to our products and services (including changes to our website) but is also used to help us to prevent and detect fraud.

If you contact us electronically, we may collect your electronic identifier e.g. Internet Protocol (IP) address or telephone number supplied by your service provider. This information may be used by us and/or shared with and used by insurers to aid in the detection of fraud.

If we speak to you on the telephone we may record the telephone call and if you use our webchat service we will keep a record of the conversation. We do this so that we have an accurate record of your conversation with us. We also use this data for monitoring and quality control purposes and may use it for training purposes.

### From price comparison sites

If you have been directed to us from a price comparison site then the price comparison site will have provided us with data that you entered in order to allow us to provide you with a quote.

When you purchase one of our policies through a price comparison site we will need to share some information with the price comparison site, for example, information relating to whether the policy has been purchased or the status of the policy. We will also exchange information that is necessary to help resolve any queries or complaints.

### Our service providers

We or our insurers will sometimes use third parties to process personal information on our behalf. Where third parties process your personal information on our behalf, we will have a contract in place with them placing obligations on them to keep your data secure and only use it for the purposes that we authorise. The third parties that we use may include, for example, IT service providers, market research agencies and debt collection agencies or tracing agents appointed by us.

### From other companies

As part of considering your quote, administering (including amending or renewing) your policy or dealing with any claims on your policy, we, our insurers and/or our credit providers will exchange information about you with other companies and/or carry out checks with various databases, which is standard practice in the insurance industry. We have set out below some of the common databases that may be checked.

#### DVLA

If you provide your, or any named driver's, driving licence number this be passed to the DVLA, either by us or the insurers we work with, in order for a search to be carried out to confirm your (or any named driver's) licence status, entitlement and relevant restriction information and endorsement/conviction data.

Undertaking searches using your driving licence number helps insurers check information to prevent fraud and ensure policy premiums are fair. A search with the DVLA will not show on your (or your named driver's) driving licence record.

For details relating to information held about you by the DVLA, please visit [www.dvla.gov.uk](http://www.dvla.gov.uk)

#### Credit searches

We and/or our insurers or credit provider(s) will carry out checks with credit reference agencies, including-

- checks against publicly available information such as the Electoral Register, County Court Judgments, bankruptcy or repossession information;
- checks against data relating to your credit history. If you enter into a credit agreement to pay for your policy, we may also pass to Credit Reference Agencies information we hold about you and your payment record with us. 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. 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 and this together with other factors will be used to assess your application for a quote or a policy.

The credit reference agencies will keep a record of the search and you may see this recorded on your credit file. If you want to check the information that the credit reference agencies hold about you then you can contact them directly.

#### Claims and Underwriting Exchange and Other Registers and Databases

We, the insurer and/or the re-insurer exchange information with various databases and registers to help us check information provided, to detect and prevent crime or fraud and to obtain information about your no claims history. These may include the Claims and Underwriting Exchange Register, the Hunter Database, the Motor Insurance Anti-Fraud and Theft Register, the No Claims History Database and any other relevant industry databases or registers. Under the conditions of your policy, you must tell us about any incidents (such as an accident or theft) which may give rise to a claim whether or not a claim is made. When you tell us about an incident, we or the insurer will pass this information to the registers and any other relevant registers.

#### 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 DVLANI, the Insurance Fraud Bureau and other bodies permitted by law for purposes not limited to but including:-

- i. Electronic Licensing
- ii. Continuous Insurance Enforcement
- iii. Law enforcement (prevention, detection, apprehension and/or prosecution of offenders)

iv. 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 MID may search the MID to obtain relevant information. Persons (including his or her 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 vehicle 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).

#### Existing Data

We will check our existing records to see if you have held a policy or obtained a quote with us or any of the brands BISL Limited administer before. We will also share personal data with our other brands, Group Companies and insurers for these purposes.

Checking and comparing this data helps us to assess your quote (including at renewal). This data will also be used for research and analysis in accordance with the section headed "What do we use your data for?" below.

#### Publicly available sources

We or our insurers use some open sources of data which are not personal data (such as information about particular geographic areas) and combine this with the personal data that we hold about you (such as your own address) in order to assess insurance risk and provide you with an accurate quote.

#### Providing data about other people

We will sometimes need you to provide us with data about other people, for example where another person is being added to the policy as a joint policyholder or named driver. Where you give us data about someone else, you must make sure that you have made that person aware of this Privacy Policy. If we ask you to confirm your consent to certain data being processed, you are giving consent for your data and any relevant data relating to the other person to be processed. Where this privacy policy refers to "your data" this also includes data about anyone else named on the policy or whose data you provide us with.

### WHAT DO WE USE YOUR DATA FOR?

The data that we hold is used for the following purposes:-

#### Part 1 - Providing you with a quote and administering your policy

The personal data that we use for the purposes set out in this Part includes information you provide during your quote, information about previous or existing policies held by us or our insurers, identification information, information from credit reference agencies, your policy and payment history and behavioural information that we gather from your use of our website and how you manage your policy.

#### Providing you with a service

As you would expect, this data is used to provide you with the service you have requested, for example a quote or an insurance policy. When you take out a policy, we will continue to use your data to provide you with annual renewal quotes and where we can we will use the data to automatically renew your policy and continue to provide you with insurance cover. If you would prefer that we don't use your data to automatically renew your policy then you can opt out of the automatic renewal process by contacting us. This means we will still use your data to generate a renewal quote but your policy will not renew unless you tell us that you would like to accept the renewal quote. You can find more information about this in your policy documents.

We also use this data (including data held in relation to our other brands) to help us build up a picture of you as a customer. This allows us to carry out more accurate assessments of you as a customer when you apply for products with us, including creditworthiness assessments. It helps us to provide you with more relevant information such as making sure we show you the right content at the right time. We also use this information to help calculate your future quotes. This information will also be shared with our insurers for these purposes.

Data protection law says that we have to tell you the legal basis on which we process your personal data.

In relation to personal data used for the purposes described in this Part 1, we process this data because it is necessary to perform the contract that we have in place with you to provide you with the quote or the policy that you have requested.

#### Part 2 – Fraud Prevention

In order to prevent and detect fraud we and/or the insurer or the re-insurer may use the personal data set out above at any time to:

- Undertake credit searches;
- Check and/or share your details with fraud prevention and detection agencies; and
- Share information about you with other organisations including the police, where necessary and proportionate

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, the insurer or other organisations may also access and use this information 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; recovering debt and tracing beneficiaries; checking details on applications for new products and dealing with claims for all types of insurance.

In relation to personal data used for the purposes described in this Part 2, we process this data because we have a legitimate business interest in carrying out these activities to protect against fraud and because there is a substantial public interest in preventing and detecting crime including fraud.

### Part 3 – Other Uses of Data

#### Marketing

When you request your quote you will be given an opportunity to confirm whether you are happy to receive marketing material from us. If you confirm you are happy to receive this material, we will use your postal address, email address and telephone number to send you marketing materials by post, email, telephone call or SMS. We do not pass your data to third parties for marketing purposes.

You can change your mind at any time by logging into your Self Service Centre and updating your preferences. You can also unsubscribe from emails by clicking on the unsubscribe link on any marketing emails that we send you or by contacting us.

This will not impact any communications that we need to send you for the purpose of your policy, for example communications about your renewal, updates about your policy or information about any quotes we've provided to you.

We use the data we hold to help us understand our customer demographic to help us improve the services that we provide to you and to help us target our advertising and marketing so that we show customers adverts or marketing which may be more relevant to them. We may sometimes work with carefully selected third parties to do this for example using advertising services provided by organisations such as Google and Facebook and may share data with them to carry out this research and analysis, however will not sell your data to third parties for them to market to you.

#### Market Research

From time to time we may want to use your postal address, email address and/or telephone number to contact you to assist us with our research by asking you a few questions about the service you have received or by asking if you would like to complete a review of our services. We may sometimes ask market research companies to contact you on our behalf.

If you would prefer us not to contact you for market research purposes then you can let us know by contacting us.

#### Research and Analysis Activities

We use data relating to your quotes or your policy, including your claims history, to carry out various research and analysis activities to help us to regularly review and improve the products and services we provide and carry out research relating to underwriting, claims and pricing. We also share this data with our insurers to enable them to use this data for these purposes. Where possible, data will be shared on an anonymised basis. The data will not be used to make any decisions that will affect you or any other individual.

We also use the data that we collect about you through your website usage to carry out research and analysis into usage and activities on our website to enable us to continue to improve our website and our products and services.

In relation to personal data used for the purposes described in this Part 3, we process this data because we have a legitimate business interest in carrying out these activities to promote and improve our business. We have ensured appropriate safeguards to protect your rights when processing this data for these purposes.

### Part 4 - Special Personal Data and Criminal Convictions

#### a. Proposed wording without amends for DP bill

In order to provide your quote and administer your policy we may ask you to provide data which data protection law classifies as "special personal data". This includes information about your health (such as any medical conditions) or information relating to criminal convictions or alleged or actual criminal offences. We will usually ask you for consent when we collect this data.

Where we collect special personal data and criminal conviction or offence data to provide you with your quote and your policy, we process this data on the basis of your consent. Under data protection law, you can withdraw your consent at any time by contacting us on the details set out under "Contacting us" below.

However, because we need this data for the purpose of your policy, if you withdraw consent then this may mean that your policy has to be cancelled and any claims arising under the policy may not be able to be dealt with and so will not be paid.

It may also be necessary for us to retain a copy of any special personal data and criminal conviction or offence data for the purpose of making or defending claims or preventing or detecting crime, including fraud.

In order to provide your quote and administer your policy we may ask you to provide data which data protection law classifies as "special personal data". This includes information about your health (such as any medical conditions) or information relating to criminal convictions or alleged or actual criminal offences.

Where we collect special personal data and criminal conviction or offence data to provide you with your quote and your policy, we process this data



because it is in the substantial public interest to do so for the purposes of advising on, arranging, underwriting or administering an insurance contract.

It may also be necessary for us to retain a copy of any special personal data and criminal conviction or offence data for the purpose of making or defending claims or preventing or detecting crime, including fraud.

#### **HOW LONG DO WE KEEP DATA?**

We'll only keep your personal data as long as we need it and ensure it is securely destroyed when it is no longer required. We do however need to keep certain data after your policy has ended for certain periods as detailed below.

Generally, if you take out a policy with us, you can expect us to keep your data for a period of 10 years following the end of your policy unless there is a requirement for us to keep the data for longer, for example if there are any ongoing queries or claims relating to the policy.

We keep data for these periods as it plays an important part in allowing us to undertake fraud detection and prevention activities, allows us to deal with any queries or complaints that may arise regarding the quote and allow us to carry out research and analysis to help us improve our products and services (as described in the section headed "What do we use your data for?" above).

#### **OVERSEAS TRANSFER OF DATA**

We may use third party suppliers to process personal data about you. Some of these suppliers may be located in countries outside the UK which may not have equivalent laws in place to protect your personal data. For example, we use third party software suppliers to process data such as your IP address and email address. Our insurers may also process personal data in countries outside the UK which may not have equivalent laws in place to protect your personal data. Our insurers are data controllers in respect of any such processing.

Whenever we do use third party suppliers to process personal data about you outside the UK we will ensure that your personal data is kept securely, is only used for the purposes set out in this Privacy Policy and is afforded equivalent protection as it would be if it were processed in the UK. We do this through various mechanisms, for example making sure that European Commission approved contractual clauses are in place with the supplier or ensuring that suppliers who process personal data in the USA are signed up to the Privacy Shield arrangement. If you would like any further information please contact us using the details in the "Contacting Us" section.

#### **YOUR RIGHTS**

Data protection law gives you various rights in relation to your personal data. All the rights set out below can be exercised by contacting us using the contact details set out under the "Contacting us" section below. Those rights include:-

- You have the right to ask us to provide a copy of the personal data that we hold about you. This is called a Data Subject Access Request or "DSAR".

You can access information about your policy and your policy documents by logging into your Self Service Centre. If you want to receive other personal data that BISL Limited holds then please contact us using the contact details below. When contacting us please describe the information you require and include the following: your full name, your date of birth, your full address and your quote/policy number. For security purposes we may need to ask you for further information to verify your identity. If you require information sending to different contact details to those held on your policy please include a copy of your passport or driving licence and proof of address such as a recent utility bill to assist us in verifying your identity. We might also need to ask you for additional information to help us locate the data that you are looking for.

Once we have all the information that we need to process your DSAR, we will respond within one month unless your DSAR is very large or complex, in which case we may need to extend this period. If we need to do this we will let you know.

If you want to make a DSAR in relation to personal data that is held by the insurer of your policy then you will need to contact the insurer directly. You can find their details in your policy documents.

With effect from 25 May 2018 when the General Data Protection Regulation comes into force,

- You have the right to ask us to correct inaccurate personal data that we hold about you. If you think any of your personal data is inaccurate, please contact us and, provided we can verify your identity and are satisfied as to the accuracy of the correction requested, we will correct the relevant personal data as soon as we can.

- You have the right to request that we provide a copy of your personal data in a machine readable format or to ask us to send your personal data to another company. This applies to personal data that you have provided to us, which we have processed electronically, such as data you entered on our website when you obtained a quote.
- You also have the right to ask us to delete personal data that we hold about you. We are obliged to delete personal data in some circumstances, such as where it is no longer needed. However, data protection laws allow us to keep the personal data if we need to, for example if the data is needed to allow us to administer your policy or if the data is needed for fraud prevention. In any case, we will retain your personal data in line with the retention periods detailed under "How long do we keep data?" above.
- You have the right to ask us not to do anything with your personal data except store it in limited circumstances, such as if you and we do not agree on the accuracy of personal data and steps are required to validate it.
- You have the right to object to us processing certain personal data about you. For example, you can ask us to stop processing data for marketing or market research purposes. However, where we need to continue to process the personal data, for example to administer your policy or for fraud prevention purposes, we are not obliged to stop processing it.
- You have the right to ask to review significant decisions that we have made about you wholly by automated means. The nature of the quotes that we provide to you means that we have to use this kind of automated decision making in relation to your personal data (including special categories of personal data) to assess your quotes. This means that our computers will consider lots of different pieces of information about you and about the policy you have requested (such as information about your vehicle) in order to calculate whether or not we are able to offer you a quote, at what price this should be and whether we can offer you a credit agreement to pay for your premium. Automated decision making will be used when you request a quote, when we are considering whether we can offer you a renewal quote and also if any changes are made to your policy. If you ask us to review the decision, we will make sure that it is examined by a human and we will confirm the outcome to you. This does not necessarily mean that the decision will be changed.

#### **CONTACTING US ABOUT DATA**

If you would like to contact us about one of your data rights set out under "Your Rights" above, then please contact [datarequest@bglgroup.co.uk](mailto:datarequest@bglgroup.co.uk) or write to Data Requests, BGL Customer Services, Fusion House, Bretton Way, Bretton, Peterborough, PE3 8BG.

If you have any other queries or concerns about this Privacy Policy, or if you would like to contact our Data Protection Officer, you can email [DPO@bglgroup.co.uk](mailto:DPO@bglgroup.co.uk) or write to the Data Protection Officer at BISL Limited, Pegasus House, Bakewell Road, Orton Southgate, Peterborough, PE2 6YS. Please make sure you include details of the product and brand that you are contacting the Data Protection Officer about in your email.

#### **INFORMATION COMMISSIONER'S OFFICE**

If you have a complaint regarding how your personal data has been processed by us then please contact us first using our complaints procedure set out in your policy documents.

You also have the right to complain to the Information Commissioner's Office, which regulates data protection compliance. You can find more information by visiting their website [www.ico.org.uk](http://www.ico.org.uk)