

SOMERSET BRIDGE INSURANCE SERVICES LIMITED TRADING AS VAVISTA

PRIVACY NOTICE

The security and privacy of your personal information is very important to us and we are committed to protecting it. This privacy notice explains how we collect and use your personal information. You and any person you request be covered under your insurance policy should read this notice carefully as it sets out your rights and our obligations to you. By providing us with information about another person you are confirming you have the legal right to provide their information to us and that they understand how their information will be used. In this notice, you/your refers to the policyholder and/or any other person insured or potentially insured by the contract or potential contract.

Who we are

Vavista is a trading name of Somerset Bridge Insurance Services Limited. Somerset Bridge Insurance Services Limited is the “controller” of your personal data. This means we are responsible for deciding how we hold and use personal information about you.

We have a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Officer at Somerset Bridge Insurance Services Limited, Lysander House, Catbrain Lane, Bristol, BS10 7TQ or dpo@sbisl.co.uk

This notice was last updated March 2022

Somerset Bridge Insurance Services Limited provides insurance services. We act as an insurance broker intermediary and sell policies on behalf of a range of insurers. Your insurer will also be a controller of your personal information and their name and contact details can be found in your Certificate of Insurance. Please read your insurer’s privacy notice for information about how your insurer uses your personal information, as this may differ from this privacy notice.

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and re-insurers. The London Insurance Market Core Uses Information Notice (<https://img.london/wp-content/uploads/2019/07/LMA-Insurance-Market-Information-Uses-Notice-post-enactment-31-05-2018.pdf>) sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. For further information we recommend you review this notice.

What information do we collect?

Personal data, or personal information, means information relating to an identified or identifiable living individual. It does not include data where the identity has been removed (anonymous data) and it would not be possible to identify an individual from this anonymous data.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, this includes, but is not limited to, any change of address, contact details, name, names of insured persons, gender, marital status and vehicle details. Please note: it is a legal requirement under the terms of your insurance policy to ensure your data is accurate and current, failure to do so may invalidate your policy.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or on your behalf

We may collect, use, store and transfer different kinds of personal data about you including:

1. General information including full name, postal and email address, date of birth, gender, contact telephone numbers, marital status, nationality, employment details and family member details.
2. Identification details including identification numbers issued by government bodies or agencies including your passport details, driving licence number and photographs which identify you.
3. Information about what or who you are asking to be insured, including vehicle details, named drivers* or your property including geological data of your residential area.
4. Previous incidents and claims history. We will ask you for details of any previous or current incidents or claims which might include information relating to your health and injuries you suffered and information relating to the outcome of these incidents and claims.
5. Criminal conviction data.
6. Financial information including your bank account and card details.
7. Special categories of personal data including information about your health, sexual orientation, racial or ethnic origin.
8. IP address, which is a unique number identifying your computer, including information to identify your browser, device, network you are using.
9. Marketing and communication preferences

Information relating to promotions entries, prizes draws, responses to surveys and customer feedbacks including details of your customer experience.

Children's Data

We may collect data about children for example car insurance for under 18s, where a child takes out a policy with us, a child is insured on an adult's policy, or where a child is a claimant.

* Please note: Where you have named driver(s) on your insurance or are requesting a quotation including named driver(s) the information we may need to collect on the named driver(s) may be identical to the type of information we have collected from you, you must ensure you have the legal right to provide such information. We reserve the right to contact any named driver to verify the information you have given us is accurate and correct and they are happy for us to hold and process their information.

Sources of information we collect about you

We collect personal information directly from you when:

1. You request a quote directly from us
2. You request a quote through price comparison website or from a broker agent
3. You purchase our product or service
4. We require additional information for our validation process
5. You interact with us through social media or contact us to make general enquiries

6. You subscribe to our marketing communications, respond to a survey or participate in promotions, competitions and market research
7. You use our website
8. We also collect data through the use of cookies and similar technologies. We use cookies to enhance your online experience and analyse the use of our websites and portal. You will find more information on the use of cookies in our [cookie policy](#)

We also obtain information about you from these sources:

1. Someone connected to you as part of a quotation for insurance or a claim, providing we have consent to do so or have legitimate legal grounds for doing so.
2. Your previous insurer to confirm a no claims discount.
3. Credit reference agencies to confirm your identity, assess the insurance risk, check your credit history and to prevent fraud. We will obtain this information at the point you request a quote from us, when you renew a policy and if you request any changes to your policy. A credit reference agency check will be recorded on your credit report, under Somerset Bridge Insurance, whether your application proceeds or not, but it won't harm or adversely affect your credit profile. You can find more information on the Credit Reference Agency Information Notice via this link www.experian.co.uk/crain

We, the insurer or finance provider, may ask credit reference agencies to provide a credit score. A credit score is a number which is calculated based on information in your credit report and is used to assess the credit risk you pose.

If you choose to pay by instalments, our finance provider will use credit reference agencies for an affordability credit search to check you can afford these payments. This search will place a search footprint on your credit file, this may be seen by other lenders and may affect your credit profile.

4. Publicly available information including the electoral register, county court judgments, bankruptcy and social media and networking sites.
5. Third party databases available to the insurance industry including but not limited to anti-fraud databases, the DVLA and government agencies.

How we use your information

The information we collect could be used for a number of purposes:

- Insurance administration of your policy including quotations, inception and renewals, financial sanction checking, payment collection and claims handling and the providing ancillary products such as Legal Expenses cover
- Communicating with you and verifying your identity when required.
- Improving our products and services, recording and monitoring telephone calls for quality assurance and training purposes, and complaint handling.
- Credit scoring and automated decision making.
- Fraud prevention and detection and investigating other crimes.

- Processing payments including debt recoveries and auto-renewals.
- Enhance your online experience and improve your customer journey by analysing the use of our websites and customer portal.
- Carrying out data analysis, risk modelling to improve and refine our pricing and data quality, product development, research and statistical purposes both during the policy term and afterwards to improve the products and services we offer. We will use the information you give us, together with information collected from external databases to help us understand and predict our customers or future customers' behaviour and preferences which then helps us to improve our products and services.
- Provide marketing information and keep you informed about promotions – depending on your marketing preferences.
- Managing our business operations; and relationships with third parties including brokers and partner, internal audits, transferring books of business, obtaining re-insurance, company sale or restructures.
- To comply with legal and regulatory obligations including cooperating with regulatory bodies, law enforcement and government authorities. And in some cases carry out processing that are in the public interest
- To enforce and defend our legal rights or that of a third party in the event of legal claim.
- Security information from CCTV recording equipment in and around our premises for monitoring and security.

Renewal

We will contact you by your chosen method of communication before your renewal to confirm your policy terms and renewal price.

Under certain circumstances and to make the process of renewal easier we can automatically renew a policy and take payment by the same payment method as the previous year. We will always write, via your preferred method of communication, to advise you before we automatically renew any policy. You can opt out of automatically renewing a policy at any time by contacting our customer services team or by emailing us at autooptout@goskippy.com. Please refer to the Terms of Business for more information on this process.

Please ensure you have made us aware of any changes to your policy details, you have the explicit consent of the cardholder for the card provided to be charged or you, being the cardholder have given us explicit consent for the card to be charged at renewal, and that the payment details have not changed.

The legal basis for processing your personal information

We will only use your personal information when the law allows us to, or where you have provided specific and explicit consent. Most commonly we use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you. This includes using your data for providing quotations, policy administration, claims processing and renewals, including renewal invitations.
- Where we need to comply with a legal obligation, including sharing information with regulators.

- Where you have given us consent to process your personal information.

We process your special category data (which is more sensitive, such as your health or sexual orientation data) in the following circumstances:

- Where you have given us your explicit consent.
- The processing is necessary for the establishment, exercise or defence of legal claims.
- The processing is necessary for reasons of substantial public interest.
 - Where it is necessary for our legitimate interests. Where we rely on legitimate interest, we will carry out a balancing test to ensure our interests and/or those of a third party does not override your interest, rights and freedom as an individual. We usually rely on legitimate interest for
 - the administration of your policy,
 - improving our products and services, quality assurance, training and security
 - preventing and detecting financial crime and fraud, credit checks
 - data analysis including risk modelling, research and statistical analysis.
 - Managing our relationships with our partners, brokers including completing audits

We process your special category data (which is more sensitive, such as your health or sexual orientation data) in the following circumstances:

- Where you have given us your explicit consent.
- The processing is necessary for the establishment, exercise or defence of legal claims.
- The processing is necessary for reasons of substantial public interest.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact the Data Protection Officer if you need details of the specific legal ground we are relying on to process your personal data.

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Marketing

We will provide you with choices regarding certain personal data uses, particularly around marketing material.

You can ask us to stop sending you marketing messages at any time by following the opt out links on any marketing message sent to you or by contacting us at any time, by post, telephone, email or such other means available.

We use a third-party provider to deliver our marketing communications by email. We gather statistics around email opening and clicks using industry standard technologies including pixel trackers to help us monitor and improve our email communications.

Third Party Websites & Hyperlinks

Our website, newsletters and blogs may also contains hypertext links to websites operated by third parties. The responsibility for the operation and content of those websites rests solely with the company controlling the third party website and will be governed by separate terms and conditions. We do not accept any

responsibility or liability for the contents of any linked website.

Social Media

When you engage with us via our social media platforms to enter a competition, we process your data to administer the competition as detailed in the terms and conditions. We may use third party fulfilment partners to assist us in administering promotions or fulfilling a competition win, including sharing your details with the fulfilment partner. In accordance with the rules of the Advertising Standards Authority, we may publish or make publicly available information that indicates that a valid award has taken place. Where we decide to publish a winner, only your surname and county will be published. You have the right to object to this use of your personal data.

Where we have entered into a Joint Controllership agreement with a third party this is so they can undertake affiliate marketing activities and post advertisements on our behalf. Both controllers will carry out tracking to pursue our legitimate interests for reporting and transaction administration.

Who will we share your information with?

Where necessary, we will share your information with:

- Other companies or brands within our group of companies and the insurer group or where we provide insurance services in partnership with them.
- Somerset Bridge Shared Services Limited, a group company which provides a range of group operational support services to Somerset Bridge Insurance Services Limited, including HR, IT, office management, legal, management information, marketing, finance and taxation, risk and compliance advice and assistance.
- When you request a quote we will share your information with insurers on our panel to obtain a quote for you.
- Insurers, re-insurers, business partners, agents, carefully appointed third parties providing a service to us on our behalf, including processing our post and mail, merchant banking facilities, and administrative services.
- Third party databases available to the insurance industry including anti-fraud databases, the DVLA and government agencies.
- If you pay your insurance premiums by instalments, this will be arranged by way of a finance arrangement with a finance provider based in the UK and authorised and regulated by the Financial Conduct Authority. To enable the finance provider to enter into a credit agreement with you, we will share your personal details, policy details and payment details. The finance provider will also be a controller of your data. We will confirm the details of the finance provider in our correspondence with you.
- If you buy an optional add on to your policy, we will share the information with the provider of the product (for example windscreen protection, legal expenses insurance).*
- Third parties we use to recover money you may owe us (debt collection).
- Other companies when we are trialing their products and services which we consider may improve our services to you and our business processes.
- Other insurers or representatives of the insurer (for example claims handlers, loss adjusters, solicitors).
- Legal, financial, medical and other professional advisors.
- Other organisations that have a specific role in law such as statutory or regulatory bodies.
- Other organisations where we have a duty or are permitted to disclose your personal information by law (for example if we receive a valid request from an official organisation in the interests of preventing or detecting crime).
- Other third parties or individuals if you have given us permission to do so or if they are acting on your behalf.
- Other third parties providing interactive features on our website in order to facilitate follow up on enquiries.
- Another company if our business or part of it is bought or taken over by that company or during confidential

discussions about a sale or take over. We will ensure the information is protected by confidentiality agreements.

- When we check your details with credit reference agencies.

Unless we are required to disclose your information by law, we will not share your personal data without safeguards being in place. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We have contracts in place with our third party data processors which means that they are unable to do anything with your personal information unless we have instructed them to do it.

Financial Crime & other fraud prevention and detection

To prevent and detect fraud, we will check your information against publicly available sources (such as social media and networking sites and the open electoral register), with fraud prevention agencies and databases. If you would like information about the databases we use, please contact the Data Protection Officer using the details provided in this notice.

We have a regulatory requirement to put in place systems and controls to manage the risk of financial crime, including compliance with the UK's financial sanctions regime. We screen your details against the HM Treasury List.

If you give us false or inaccurate information and/or we suspect fraud, we will record this. If fraud is identified or suspected, we will pass details to fraud prevention agencies. Law enforcement agencies and other organisations may access and use this information to detect and prevent fraud, for example when checking details on applications for credit, managing credit accounts, checking details on proposals and claims for insurance, completing credit searches.

We share information with your insurer which is used to update other organisations and industry databases, this includes the Claims and Underwriting Exchange Register and databases, the Motor Insurance Anti-Fraud and Theft Register. We will pass information relating to your insurance policy and incident to the operators of these registers, their agents and suppliers.

Motor policy information will be added by your insurer to the Motor Insurance Database (MID) managed by the Motor Insurers' Bureau. This may be used by other statutory and authorised bodies. If you are involved in an accident in the UK or abroad, the MID will be searched to obtain policy information. You can find more information at <https://www.mib.org.uk/media/417718/article-14-wording-ncd.pdf>

Automated decision making

In certain circumstances, we are permitted to carry out automated decision making, which is the process of reaching a decision by automated means and without any human involvement. We are permitted to do this when the decision is necessary for entering into, or performance of, a contract, when the decision is authorised by law or based on your explicit consent. We use automated processes to assess your application for insurance, administer policy changes and to carry out policy renewals. This involves checking the information you have provided, analysing the claims you may make, ability to pay the insurance premium and risk of fraud. This involves the use of systems to reach a decision whether we can provide a quote for insurance and the price. Where we base a decision on solely automated decision making, you are entitled to request the decision is reviewed and to contest the decision.

International transfers

We and our appointed third-party service providers may transfer and process personal information outside the European Economic Area. To protect your personal information transfers are subject to data safeguards, to ensure compliance with data protection laws. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised and/or unlawful way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any personal data breach (whether suspected or actual) and will notify you and any applicable regulator of a breach where we are legally required to do so, or where we believe you have the right to know of such breach.

How long we keep your information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you, which includes third party claims.

To determine the appropriate retention period for your personal data, we consider the amount, nature and sensitivity of your personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. If you would like further information about how long we keep your personal data, please contact the Data Protection Officer using the contact details above.

Your legal rights

You have a number of rights under data protection laws in relation to your personal data. The rights available to you depend on our reason for processing your information.

- Right of access. You have the right to ask us for copies of your personal information, this is known as a Subject Access Request (SAR). You can always rely on this right, but there are some exemptions, which means you might not always receive all the information we process.
- Request rectification of Your personal data if it is inaccurate or incomplete;
- Request erasure of Your personal data in certain circumstances;
- Restrict our use of Your personal data in certain circumstances;
- Move (or port) personal data. This only applies to information you have given us. You have the right to transfer the information you gave us from one organisation to another, or for us to give it to you;
- Object to the processing of your data where our legal basis for processing is based on our legitimate interests.

If you would like to exercise any of your data protection rights, please contact the Data Protection Officer using the contact details above, to enable us to process your request as expediently as possible please supply your name, address, date of birth and what information you are seeking. We may ask you to provide further evidence to prove your identity to ensure we are complying with the legal requirements to process your request.

Where We are in a Joint Controllers of your personal data with a third party You may exercise your rights against either party.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive and we will inform you of the fee and seek your acceptance of it prior to complying with your request. Alternatively, we could refuse to comply

with your request, in part or completely depending on the nature of your request, in these circumstances and we will advise you of the grounds for the refusal or partial refusal.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you as soon as possible and in any event during the one month period and keep you updated as necessary until we have formally responded to your request.

Other Websites

Our website contains links to other websites. This Privacy Policy only applies to this website and the services and products we provide; when you link to other websites you should read the separate privacy policies on those sites.

Complaints

If you have any queries or concerns about this notice or your personal data, please contact us at dpo@sbisl.co.uk or via the postal address above, marked for the attention of the Data Protection Officer. If you remain dissatisfied, or you would prefer not to discuss the issue with us, you can also make a complaint to the Information Commissioner's Office using the following contact details:

England	Information Commissioner's OfficeWycliffe House Water Lane Wilmslow Cheshire, SK9 5AF Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)Email: casework@ico.org.uk
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Scotland	Information Commissioner's Office45 Melville Street Edinburgh, EH3 7HI Phone: 0303 123 1115 Email: scotland@ico.org.uk
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Wales	Information Commissioner's Office2nd Floor Churchill House Churchill way Cardiff, CF10 2HH
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Phone: 029 2067 8400
Email: wales@ico.org.uk

Northern Ireland

Information Commissioner's Office
3rd Floor
14 Cromac Place
Belfast, BT7 2JB
Phone: 0303 123 1114 (local rate) or
028 9027 8757 (national rate)
Email: ni@ico.org.uk