

Data Protection – Privacy Notice for Policyfast/ CUL customers

Introduction

Policyfast Ltd (incorporating City Underwriters Limited (CUL)) is part of Jensten Group Limited. We are a wholesale company meaning that we do not deal directly with policyholders or potential policyholders. We deal with your agent or broker and assist them in arranging insurance for you with our Insurer panel. As part of this process we will receive and process personal data provided to us by your agent/broker.

We recognise our responsibility to treat your personal information with care and to comply with all relevant legislation, in particular the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR). – the legislation

This notice covers our requirement to provide you with information on how and why we use your personal data and of your rights under the legislation

Data Controller

For the purposes of the legislation, Policyfast Ltd and CUL are “data controllers”. Our IT company Datamatters Ltd which is also a member of Jensten Group Limited is a joint data controller. Collectively we will process your personal data for the purposes set out below. Our contact details are shown at the end of this notice.

As explained later, your data may be passed to other parties, including Insurers, for the purposes of arranging your insurance. These parties could also be data controllers and where necessary will issue their own Data Protection Privacy Notices and/or make them available via their web sites.

Personal Information

We will use personal information about you mainly to:-

- Provide your agent/broker with a quotation from Insurers
- Arrange a policy if instructed to do so by your agent/broker
- Arrange changes to and/or renewal of your policy if requested to do so by your agent/broker
- Arrange Premium Finance/Consumer credit for you if required
- Statistical analysis

Some of the personal information we ask you to provide may be sensitive (special category) as defined in the legislation. For example you may have to give us information about medical history, criminal convictions or driving offences. We are allowed by the legislation to collect such information for insurance purposes without specific consent but it will only be used for the purposes set out above.

If you give us information about another person, in doing so you confirm that they have given you permission to provide it to us and that we may use their personal data in the same way as your own as set out in this notice.

Legal Basis for processing your Personal Information

We are required to have a lawful basis (as defined in the legislation) in order to process your personal data and the relevant bases which we use are show in the table below.

Purpose of processing	Lawful Basis
Providing quotations; arranging and administering insurance policies	Necessary for the performance of an insurance contract
Arranging Premium Finance/ Consumer Credit	Necessary for the performance of a consumer credit contract
To notify your agent/broker of changes in our service	Our Legal and Regulatory obligations
To prevent and detect fraud, money laundering and other financial crimes	Our Legal and Regulatory obligations
To meet general legal or regulatory obligations	Our Legal and Regulatory obligations
Statistical analysis	Our legitimate interests – to refine and enhance the products and pricing which we can offer

Disclosure of your Personal Information

As a necessary part of providing you with the services described above or in our legitimate interests we may need to disclose your personal data to certain third parties. These include:-

- Premium Finance companies
- Computer bureaux/Software Houses
- Insurers
- Other Insurance Intermediaries
- Insurance Industry databases
- Government databases
- Credit agencies
- Regulatory authorities
- The Police and other law enforcement bodies

Profiling

For our quotation systems we may use external data from Credit agencies, Electoral Roll, etc. to help in decision-making on pricing and risk acceptance. This may be regarded as “profiling” as defined in the legislation.

The legislation requires safeguards in the event that this has a legal or similarly significant effect on individuals. We do not consider that our processing poses such risks but you have rights to further information on these processes as explained below.

Retention Period

Your data will not be retained for longer than is necessary and will be managed in accordance with our data retention policy. In most cases the period will be for a maximum of 7 years following the expiry of an insurance contract unless we are required to retain the data for a longer period due to business, legal or regulatory requirements.

International transfers of data

We may transfer your personal data to destinations outside the European Economic Area (EEA). Where we do we will ensure that it is treated securely and in accordance with the Legislation.

Your Rights

Under the legislation you have the following rights in relation to our processing of your personal data:-

1. The right to be informed about how we use your personal data (This Privacy Notice)
2. The right to see a copy of the personal information we hold about you. (In most cases this will be free of charge)
3. The right to have personal information rectified if inaccurate or incomplete.
4. The right of erasure of your personal information where there is no compelling reason for its continued processing
5. The right to restrict processing in certain circumstances e.g. if its accuracy is being contested.
6. The right to data portability which, subject to certain conditions, allows you to obtain and reuse your personal data across different services
7. The right to object to certain processing including for the purposes of direct marketing
8. Rights to information in relation to automated decision making and profiling.

Complaints

If you have a complaint about how we use your personal information please contact us at the address below. You also have the right to lodge a complaint with the Information Commissioner’s office at any time.

Contact Us

For further information on this Privacy Notice, to access your personal information or to exercise any of your other rights, please contact Policyfast Ltd, Coversure House, Vantage Park, Wasingley Road, Huntingdon, Cambridgeshire, PE29 6SR. You may contact us directly or via your agent/broker.