

Privacy Notice

Faraday is committed to protecting information which identifies and relates to you or other individuals and complying with data protection laws. Please read this privacy policy with care. It provides information about how we use personal information and the rights available to you under UK and EU data protection laws.

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1. The persons to which this privacy policy applies

Any private individual based in the UK or European Union about whom Faraday holds personal data, including policyholders, claimants, enquirers or beneficiaries and their agents (“you”).

2. Information 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:

<u>Individual Details</u>	Name, address, other contact details (e.g. email and telephone numbers), gender, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you.
<u>Identification Details</u>	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving license number.
<u>Financial Information</u>	Bank account or payment card details, income or other financial information.
<u>Special category data</u>	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.
<u>Risk Details</u>	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.
<u>Policy information</u>	Information about the quotes you receive and policies you take out.
<u>Credit and fraud data</u>	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you.
<u>Claims history</u>	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.

3. Where will we collect your personal data from?

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

- You, your employer or broker;
- 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 other parties involved in the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers

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

4. Who has access to your personal data and how to identify them

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 lifecycle in the following ways:

- Where you took out the insurance policy yourself: the insurer and, if purchased through an intermediary, 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 benefit: your employer or the organisation that took out the policy should be able to 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: the organisation that collected your personal data should provide you with details of the relevant participant's data protection contact.

5. The purposes and legal basis for processing your personal data

We will only process your personal data where we have established a legitimate business need and a legal basis for doing so, including obtaining your consent where required. We set out below the purposes that we might use your personal data for:

Quotation/Inception	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Client care, including communicating with you and sending you updates • Payments to and from individuals
Claims Processing	<ul style="list-style-type: none"> • Managing insurance and reinsurance claims • Defending or prosecuting legal claims • Investigation or prosecuting fraud
Renewals	<ul style="list-style-type: none"> • 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 necessary for the provision of insurance	<ul style="list-style-type: none"> • Complying with our legal or regulatory obligations • Pricing and risk modelling • Handling complaints • Transferring books of business, company sales & reorganisations

6. Who your personal data may be shared with

In order to undertake the activities listed in section 5 above, it may be necessary to share your personal data with third parties. Who we share your personal data with will depend on the nature of your relationship with us, but may include:

- Other insurers that co-insure your policy;
- Reinsurance companies;
- Loss adjusters, solicitors and claims management companies;
- Anti-fraud agencies and private investigators;
- Government departments and databases;
- Outsourcing service providers and software providers; and
- Regulators.

7. Direct Marketing

We will not undertake any direct marketing via any medium without obtaining your consent to do so.

8. Profiling

When calculating insurance premiums, we may compare your personal data against industry averages. Your personal data may also be used to create the industry averages in the future. This is known as profiling and is used to ensure premiums reflect risk.

Profiling may also be used by us to assess information you provide to understand fraud patterns. Where special categories of personal data are relevant, your special categories of personal data may also be used for profiling.

If you want to understand more about profiling activities in relation to your personal data, contact our Data Protection Officer (details in section 11).

9. Retention of your personal data

We will keep your personal data only for as long as is necessary and for the purpose for which it was originally collected. In particular, only for as 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.

10. Transfer of your personal data outside of Europe

We may need to transfer your data to other 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 where we are satisfied that your personal data will be protected. If you would like further details of how your personal data would be protected if transferred outside the EEA, please contact our Data Protection Officer (details in section 11).

11. Your rights and contact details

If you have any questions in relation to our use of your personal data, you should first contact our Data Protection Officer using the following details:

Data Protection Officer
Faraday
Corn Exchange, 55 Mark Lane
London EC3R 7NE
Faraday_compliance@faraday.com

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).

12. Your right to complain to the Information Commissioner’s Office

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, or if you think that we have breached UK or EU data protection rules, then you have the right to complain to the Information Commissioner’s Office (ICO). Please see below for contact details of the ICOs in the relevant jurisdictions.

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