

Privacy Notice and Cookie Policy

Privacy Notice

About us

We One Sure Insurance Ltd (also referred to as “we”, “us”, or “our”) are a registered company in England (Company no. 05649077). Our registered address is Spitfire House 142-154 Congleton Road, Talke, Stoke On Trent, Staffordshire, ST7 1LX. One Sure Insurance also trade as Compare HGV, Spitfire Insurance, Staveley Head, Unicom Insurance Services, and Insurance4Motor Trade.

The purpose of this notice

This Notice is designed to help you understand what kind of information we collect in connection with our products and services and how we will process and use this information. In the course of providing you with products and services we will collect and process information that is commonly known as personal data.

This Notice describes how we collect, use, share, retain and safeguard personal data.

This Notice sets out your individual rights; we explain these later in the Notice but in summary these rights include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.

We will process your personal data in line with:

The UK’s updated Data Protection Act 2018, which was initially the UK’s enactment of the EU GDPR

The UK retained provisions of the EU’s General Data Protection Regulation (‘UK GDPR’) (retained by virtue of the European Union (Withdrawal) Act 2018)

Regulations based on wider EU legislation such as the Privacy and Electronic Communications Regulations (EC Directive) 2003 (PECR) and future updates.

Wider guidance from the Information Commissioners Office – www.ico.org.uk

What is personal data?

Personal data is information relating to an identified or identifiable natural person. Examples include an individual's name, age, address, date of birth, their gender and contact details.

Personal data may contain information which is known as special categories of personal data. This may be information relating to an individual's health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to or sexual orientation.

Personal data may also contain data relating to criminal convictions and offences.

For the purposes of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data, where we are legally required to comply with specific data processing requirements.

Personal data we collect

In order for us to arrange and administer insurance for you we will collect and process personal data about you. We will also collect your personal data where you request information about our services, customer events, promotions and campaigns.

We may also need to collect personal data relating to others in order to arrange and administer insurance. In most circumstances, you or someone you have authorised to act on your behalf (a representative) will provide us with this information. Where you disclose the personal data of others, you must ensure you are entitled to do so.

You may provide us with personal data when completing online quote or contact forms, when you contact us via the telephone, when writing to us directly or where we provide you with paper based forms for completion or we complete a form in conjunction with you.

We will share your personal data within our firm and with business partners. This is normal practice within the insurance industry where it is necessary to share information in order to place, quantify and underwrite risks, to assess overall risk exposure and to process claims. It is also necessary to determine the premium payable and to administer our business.

We also share personal data with authorised third parties; this is necessary where we are required to do so by law, where we need to administer our business, to quote for, source, place and administer your insurances (including arranging insurance premium finance), to perform underwriting activities and to process claims. Some examples are:

- Insurers;
- Underwriters;
- Premium finance providers;
- Credit reference agencies;
- Debt recovery agencies;
- Claims handling companies;
- Loss adjusters;
- Insurance brokers;
- The Financial Ombudsman
- DVLA
- Law enforcement agencies
- Reinsurers;
- Regulators.

We will collect your personal data when you visit our website, where we will collect your unique online electronic identifier; this is commonly known as an IP address.

We will also collect electronic personal data when you first visit our website where we will place a small text file that is commonly known as a cookie on your computer. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating our website and when using features. Cookies make the interaction between One Sure Insurance and its users smoother, they are not programs and they can not harm your computer. If you have any issues with using cookies you may delete these files from your internet browser, however, should you return to One Sure Insurance's website you will be prompted to accept a new cookie.

We may record your communications with us when contacting our customer care, complaints, and other customer focused functions. We also collect personal data through the use of telematics or similar locational tracking services, where you have agreed to the use of this particular service.

Where we collect data directly from you, we are considered to be the controller of that data, i.e., we are the Data Controller. Where we use third parties to process your data, these parties are known as 'processors' of your personal data. Where formal arrangements exist between us and those processors for them to process data purely under our instruction and not on their own behalf, they will be Data Processors. Where there are other parties involved in underwriting or administering your insurance they may also process your data in which circumstance we will be a joint data controller of your personal data.

A data 'controller' means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data 'processor' means the individual or organisation which processes personal data on behalf of the controller.

As a provider of insurance services, we will process the following categories of data:

- Personal data such as an individual's name, address, date of birth, gender, contact details and details of historic claims
- Special categories of personal data such as health and details on historic claims resulting in injury (physical and physiological)
- Data relating to criminal convictions and offences such as details of driving offences or insurance fraud

If you object to the collection, sharing and use of your personal data we may be unable to provide you with our products and services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

If you require more information about our insurance processes or further details on how we collect personal data and with whom we share data with, please contact our data privacy representative by e-mailing Datarequests@onesureinsurance.co.uk.

Why do we need your personal data?

We will use your personal data for the performance of our contract with you, to quote for and provide you with insurance products and services, to process claims and renewals, to administer your policy and our business, to respond to any requests from you about services we provide and to process complaints. We will also use your personal data to manage your account, perform statistical analysis on the data we collect, for financial planning and business forecasting purposes and to develop new and market existing products and services.

We will use any special category and criminal conviction data we collect about you for the performance of our contract with you which is deemed to be necessary for reasons of substantial public interest. This allows us to quote for and provide you with insurance products and services, to process claims and renewals and to administer your policy.

In purchasing our products and services you should understand that you are forming a contract with us. If you contact us for a quote or request details on the services we provide, we consider ourselves as having a legitimate business interest to provide you with further information about our services.

In some situations, we may request your consent to market our products and services to you, to share your data or to transfer your data outside the European Economic Area. Where we require consent, your rights and what you are consenting to will be clearly communicated to you. Where you provide consent, you can withdraw this at any time by contacting our data privacy representative by e-mailing Datarequests@onesureinsurance.co.uk.

Any data we hold about you will remain with One Sure Insurance for a reasonable amount of time. For situations where no contract is entered in to; we will hold your data for a period of 3 years, and for any insurance contract that is entered in to; your data will be held on file for a period of 40 years. The retaining of data is necessary where required for contractual, legal or regulatory purposes or for our legitimate business interests for statistical analysis (profiling) and product development and marketing purposes. Sometimes we may need to retain your data for longer, for example if we are representing you or defending ourselves in a legal dispute or as required by law or where evidence exists that a future claim may occur.

You should be aware that we use automated decision making (services/tools and techniques) to check for customer suitability to our products, for example we might perform a credit search to check an individual's solvency and credit rating. You have the right to object to the use of automated decision making (services/tools and techniques).

International transfers of personal data

We will transfer your data to third parties based outside the European Economic Area. This is necessary for the purposes of administering our business and underwriting and claims processing purposes. Such parties are not permitted to use your personal data for any other purpose than for what has been agreed with us.

These parties are also required to safeguard your personal data through the use of appropriate technical and organisational data security measures and are prohibited from disclosing or sharing your data with other third parties without our prior authorisation, or unless as required by law.

Please contact our data privacy representative for a list of countries and organisations your personal data is transferred to.

How your information will be used

We will use your information for the following:

- Processing quotations by submitting your application to a panel of insurers
- Administering and maintain your insurance policy
- Confirming your identity and verifying information you have provided
- Ensure fraud prevention
- Carrying out all obligations arising from any contracts entered throughout the lifecycle of your policy, including premium/debt payments from any card details we hold on file
- Carrying out legally required pre-contract searches such as financial sanctions register checks
- Dealing with any queries whether that be direct with you or with third party companies such as insurers, credit agencies or law enforcement
- Keeping you informed about insurance products and promotions via the methods of communication you have agreed to and of which we believe to be of benefit to you
- Renewing your insurance policy
- In the event that One Sure Insurance Ltd undergo re-organisation or One Sure Insurance is sold to a third party, any data we hold about you will be transferred to that re-organisation entity or third party.

As a provider of insurance services, we will process the following categories of data:

- Personal data such as names, addresses, date of birth, gender, contact details and details of historic claims
- Special categories of personal data such as health and details on historic claims resulting in injury
- Debit/Credit card data for the purposes of taking payments
- Data relating to criminal convictions and offences such as details of driving offences or insurance fraud

One Sure Insurance may also monitor and record calls, emails, text messages and any other forms of communication for the following reasons:

- Business purposes such as quality control and training
- Prevention of unauthorised use of our telecommunication systems and websites
- Ensuring effective system operations
- Meeting legal obligations
- Protecting your vital interests
- For the legitimate interests of the data controller
- Your personal data and debit/credit card data will be processed for the necessary performance of the contract you will be entering into or have entered in to, and any special category data will be processed for reasons of substantive public interest. For the purpose of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data where we are legally required to comply with specific data processing requirements.

Protecting your information

One Sure Insurance is committed to high standards of information security, privacy, and transparency. We place a high priority on protecting and managing data and we have established and implemented robust frameworks to ensure security to the best of our ability. The policies and procedures we have in place range from:

- Physical and logical access controls to encrypt data/firewalls
- Providing employee awareness through mandatory training covering information security, data protection and fraud awareness
- Monitoring of key partners to manage information security risks
- Disposal of confidential waste procedures
- Paperless desk policies

Your rights

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data.

These rights are known as individual rights under the Data Protection Act 2018. The following list details these rights:

- The right to be informed about the personal data being processed
- The right to access personal data
- The right to rectification of personal data
- The right to erasure of personal data
- The right to restrict the processing of personal data
- The right to data portability (to receive an electronic copy of your personal data)
- The right to object to the processing of personal data
- Rights in relation to automated decision-making and profiling

Individuals can exercise their rights at any time. As mandated by law we will not charge a fee to process these requests, however, if your request is considered to be

repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

A response to your request will be provided to you within 30 days of us receiving a valid request. We do have the authority to extend these requests; following ICO guidance. If we do need to do this, we will write to you to confirm this within 30 days of receiving your original request to explain our reasons why.

In exercising your Individual Rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for taxation, prevention of crime and for regulatory and other statutory purposes.

You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

The flow of data within the insurance sector is complex and we ask you to keep this in mind when exercising your 'rights of access' to your information. Where we may be reliant on other organisations to help satisfy your request this may impact on timescales.

Cookies

This website uses:

Necessary Cookies:

- **moove_gdpr_popup:** This cookie is used for saving your cookie settings. It is necessary for us to follow the GDPR and other privacy rules.

3rd Party Cookies:

- **Google Analytics:** This cookie is used to gather valuable insights into website traffic and user behaviour. It helps us understand how visitors interact with the site, such as the pages they visit, the duration of their visit, and the source of their traffic. This data allows website us to make informed decisions to improve our website's performance and user experience.
- **Google Ads:** This cookie is utilized for tracking and optimizing online advertising campaigns. It helps us measure the effectiveness of our Google Ads campaigns by tracking user interactions, such as ad clicks and conversions. By analysing this data, we can refine our advertising strategies and target relevant audiences more effectively.
- **Facebook Pixel:** This cookie enables us to measure, optimize, and build audiences for our Facebook advertising campaigns. It tracks user interactions on the website and provides insights into the effectiveness of Facebook ads by measuring conversions, retargeting website visitors, and creating custom audiences. This data helps us reach our target audience and deliver more personalized and relevant ads.
- **Google Tag Manager:** Google Tag Manager (GTM) is a tag management system provided by Google. It allows us to easily manage and deploy the Google Analytics, Google ads & Facebook Pixel tags and tracking codes on our website without manually editing the website's code.
- **gclid:** The "gclid" cookie is used in the context of Google Ads campaigns that utilize the Google Click Identifier (gclid). When a user clicks on a Google Ads advertisement, the gclid parameter is appended to the landing page URL. The gclid cookie is then set to store this unique identifier. The gclid cookie serves several purposes:
 - **os_affinity_code:** This cookie allows us to track the utm_campaign links from marketing campaigns, to track the return on investment (ROI) by sending the campaign name through our website forms, and dynamically changing the numbers on the website to campaign specific phone numbers.

Additional cookies:

- **Microsoft Clarity:** This cookie is used for website analytics and optimization. It provides us with detailed insights into user behaviour, including heatmaps, session recordings, and click-tracking. This data helps website owners identify areas for improvement, such as website usability, page layout, and user engagement. By understanding how users interact with our site, we can enhance the overall user experience and increase conversion rates.

Complaints

If you are dissatisfied with any aspect of the way in which we process your personal data, please contact our Data Privacy Representative on the address noted below.

You also have the right to complain to the UK's data protection supervisory authority, the Information Commissioner's Office (ICO). One Sure Insurance's ICO registration number is: Z9366683. The ICO may be contacted via its website which is <https://ico.org.uk/concerns> or by calling their helpline on 0303 123 1113.

How to contact us

If you have any questions regarding this Notice, the use of your data or your Individual Rights please contact our Data Privacy Representative at:

One Sure Insurance

Spitfire House

142-154 Congleton Road

Talke

Stoke on Trent

ST7 1LX

Or by e-mailing **Datarequests@onesureinsurance.co.uk** or by telephoning **01782 880140**.

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