
Fair Processing Notice – how we use your information

1. What is this Notice?

We take your privacy seriously and this fair processing notice (**Notice**) sets out how we will collect, use and share your personal information and explains your data protection rights and how to contact us. If you would like to receive this Notice in an alternative format such as large print, audio or braille, please let us know. You can contact us using the details in section 17 of this Notice.

In this Notice, references to **you** or **your** shall mean you as a customer or prospective customer of our Ecoinsurance product (**Ecoinsurance**). If you purchase our Ecoinsurance, this Notice should be read together with your policy documents.

2. Who are we?

We are Soteria Insurance Limited and we are classed as a data controller of your personal information. Our registered office address is at 2nd Floor, Arndale House, Market Street, Manchester M4 3AG.

When we use terms such as **we**, **us** and **our** in this Notice, we mean Soteria Insurance Limited.

We have appointed a Data Protection Officer (**DPO**) to oversee our handling of personal information. Our DPO can be contacted by email at dataprotection@markerstudy.com or by letter to Data Protection Officer, Soteria Insurance Limited, 2nd Floor, Arndale House, 122A Market Street, Manchester M4 3AG.

The following companies are also data controllers of your personal information. It is important that you read their privacy policies because they set out your privacy rights when it comes to their handling of your personal information, and also explains their privacy and data protection obligations:

BGL Group Limited

We have appointed BGL Group Limited (**BGL**) to arrange and administer our Ecoinsurance. BGL will collect your personal information in order to provide you with your Ecoinsurance and will share it with us for marketing and product management purposes. For further information about how BGL use your personal information, please see BGL's privacy policy [here](#).

Co-op Insurance Services Limited

Co-op Insurance Services Limited (Co-op Insurance Services) is part of a family of businesses known as the Co-op Group which also includes Food, Funeralcare, Health and Legal Services. Co-op Insurance Services is located at 1 Angel Square, Manchester, M60 0AG. Co-op Insurance Services has appointed a Data Protection Officer who can be contacted by letter: Data Protection Officer, Co-op Insurance Services, 5th Floor, 1 Angel Square, Manchester, M60 0AG.

Co-op Insurance Services has appointed the Markerstudy Group, specifically Affinity Insurance Solutions Limited and Markerstudy Insurance Services Limited (together MSG), as a partner, to arrange Car or Home Insurance by using a carefully selected panel of third party insurers. Co-op Insurance Services and MSG are separate data controllers of your personal information in relation to Car or Home Insurance. This means both have responsibility for your personal information.

Co-op Insurance Services is responsible for the promotion of Car or Home Insurance but will not usually collect any personal information from you directly.

Markerstudy Group

Markerstudy Insurance Services Limited and Affinity Insurance Solutions Limited are referred to in this Notice as 'MSG'.

MSG has its registered office at 45 Westerham Road, Bessels Green, Sevenoaks, TN13 2QB. MSG has appointed a Data Protection Officer who can be contacted by email at dataprotection@markerstudy.com or by letter to Data Protection Officer, Markerstudy Group, 45 Westerham Road, Bessels Green, Sevenoaks, TN13 2QB. MSG provides Car and Home Insurance, administration and associated services to customers. MSG will collect your personal information and will share it with Soteria Insurance Services and Co-op Insurance Services for the purposes set out in the 'How do we use your personal information?' section below.

A copy of the joint privacy notice for Co-op Insurance Services and MSG can be found [here](#).

3. What is this Notice?

We collect your personal information from:

- (a) you directly when you make a claim;
- (b) someone else acting on your behalf who gives us information about your claim directly;
- (c) other motorists who you may have been involved in a vehicle incident with;
- (d) publically available sources such as social media and the electoral register;
- (e) fraud prevention and detection agencies, organisations and databases;
- (f) government and law enforcement agencies; and
- (g) regulators.

4. What kinds of personal information does BGL provide to us?

When you apply for a quotation and/or purchase Ecoinsurance, BGL collect certain information from you such as your name, gender, marital status, address, email address, contact telephone number, vehicle registration number and bank account details.

In order to provide you with Ecoinsurance, BGL may need to collect personal information which the data protection laws define as special categories of data, such as medical history (this may include asking you whether you have a medical condition which requires to be notified to the Driver and Vehicle Licensing Agency). BGL also collect data that relates to criminal convictions and fixed penalties.

BGL will share the personal information listed above with us for the purposes set out in this Notice.

5. What kinds of personal information do we collect?

We collect and retain your personal information when you make a claim on your Ecoinsurance and/or a complaint about your claim, and when you contact us. The personal information that we collect from you will depend on your relationship with us and whether, for example, you are a policyholder or named driver. If you make a claim, we will ask you for information such as your name, address, date of birth, email address and contact telephone number which will allow us to verify the information that we already hold about you. In addition, we will ask you about any previous claims that you have made and details of any convictions.

6. How do we use your personal information?

We may use your personal information (and any personal information relating to any joint policyholder(s) or covered parties):

- (a) to administer any claims and/or complaints in relation to a claim on the basis that processing is necessary to perform our Ecoinsurance contract with you;
- (b) to run checks for identification, creditworthiness and price setting against databases such as the Co-op Group membership database which

contains information about members and how they use their Co-op Group membership cards, and other databases which contain publicly available information such as County Court Judgments, bankruptcy and repossessions;

- (c) to manage your policy on the basis that processing is necessary to perform our Ecoinsurance contract with you;
- (d) to ask for your feedback, assess customer service and satisfaction and to improve overall operations;
- (e) to communicate with you and resolve any complaints that you may have;
- (f) to assess risk and set prices;
- (g) to develop and test new services and products for you;
- (h) to help set our financial reserves;
- (i) to prevent and detect fraud and crime;
- (j) to communicate with you, where you have consented to receive communications or by sending you information about similar products or services which we think may be of interest to you. We will not send you marketing communications if you have opted out of receiving marketing. You will be able to opt-out of such communications at any time by contacting us using the details at section 17 of this Notice;
- (k) to validate your personal information (and, in some cases, match it against information that has been collected by a third party) to check that the personal information we hold about you is accurate, consistent and up-to-date;
- (l) to comply with our legal obligations;
- (m) to help us improve our service and our communications to you. For example, to find out when your insurance may be due for renewal so that we can contact you at the appropriate time;
- (n) to help us assess customer satisfaction and improve the service of our third party partners who we may refer you to, and who will provide us with details of any complaint that you make to them about their services;
- (o) to decide how much risk to keep and how much risk we should pass to another insurer.

7. What is our legal basis for using your personal information?

We will only use your personal information where it is permitted by law and where:

- (a) we need to use your personal information to perform our Ecoinsurance contract with you;
- (b) we need to use your personal information to comply with our legal or regulatory obligations;
- (c) you have given us consent to use your personal information (if consent is needed);
- (d) it is reasonable for us to do so and there is no disadvantage to you or risk to your personal information.

8. Who do we share your personal information with?

We will only share your personal information with:

- (a) companies identified as data controllers of your information in section 3 of this Notice;
- (b) service providers who assist us to manage your Ecoinsurance;
- (c) third party partners who process and store your personal information on our behalf;
- (d) social media companies and our advertising partners;
- (e) professional advisors;
- (f) individuals who you nominate as referees to verify certain information;
- (g) crime and fraud prevention agencies and organisations;
- (h) law enforcement, taxation and legal authorities;
- (i) reinsurers;
- (j) claims handling agencies.

We may also share your personal information with third parties in the event that:

- (i) our Co-op business or substantially all of its assets are acquired by a third party;
- (ii) we are under a duty to disclose or share your personal information to comply with our legal obligations;
- (iii) we must enforce any contract with you; or
- (iiii) we must protect our rights, property or the safety of our employees, customers, or others.

In sharing your personal information, we will ensure that your information is properly protected and used in accordance with this Notice.

9. Will we transfer your personal information outside the UK?

We may need to transfer your personal information outside the UK to countries where data protection laws may not provide the same level of protection as those in the European Economic Area. We shall ensure that any such transfers are lawful and that your personal information is kept secure.

10. What do fraud prevention agencies do with your personal information?

We will share the personal information we have collected from you about your claim and/or the personal information that BGL have shared with us with fraud prevention agencies such as CIFAS who will use it to prevent fraud and money-laundering and to verify your identity. If a fraud risk is detected, you could be refused Ecoinsurance or any other insurance product.

You have a legal right to obtain details of those fraud prevention agencies from whom we obtain and to whom we pass information about you.

You also have a right to further details explaining how the information held by fraud prevention agencies may be used. For further information about the use of your personal information by fraud prevention agencies, please contact us using the details in section 17 of this Notice.

11. Why do we add your details to the Motor Insurance Database?

Your personal information will be added to the Motor Insurance Database (**MID**), managed by the Motor Insurers' Bureau (**MIB**). The MID and the personal information stored on it may be used by certain bodies permitted by law including, but not limited to, the DVLA, the DVANI, the Insurance Fraud Bureau and the police for the purposes of:

- (a) law enforcement;
- (b) Electronic Vehicle Licensing and Continuous Insurance Enforcement;
- (c) preventing and detecting crime and the apprehension and/or prosecution of offenders (including, but not limited to, establishing whether a driver's use of the vehicle is likely to be adequately covered by a motor insurance policy);
- (d) for 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 in the UK or abroad, other insurers and/or the MIB may search the MID to obtain relevant policy information.

Persons (including their appointed representatives) making 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.

If you would like to find out more information about the use of your personal information by the MIB please visit www.mib.org.uk or contact us using the details in section 17 of this Notice.

Please note that it is vital that the MID has your correct vehicle registration number. If it is incorrectly shown on the MID then 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.

12. How long will we keep your personal information for?

As a principle, we only keep your personal information for as long as it is needed for each of the purposes we have identified above. Usually, we will retain your information for up to seven years, unless there is an exceptional business purpose in which this time period needs to be extended. If you would like further information about our retention procedures, please contact us using the details in section 17 of this Notice.

13. What are your rights?

Data protection laws give you a number of rights as set out below. If you would like to exercise any of your rights, please contact us using the details in section 17 of this Notice. Please note that we will contact BGL on your behalf to ensure that they assist us with fulfilling your request.

Right to access your personal information: you may request access to a copy of your personal information. Please send all requests for access in writing.

Right to withdraw consent: if you have given consent to use your personal information to send you marketing, you can withdraw your consent at any time.

Right to rectification: you may ask us to rectify any inaccurate information we hold about you. If you would like to update the personal information we hold about you, please contact us.

Right to erasure: you may ask us to delete your personal information. If you would like us to delete the personal information we hold about you, please contact us, specifying why you would like your personal information deleted.

Right to portability: you may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable format, or ask for us to send such personal information to another data controller.

Right to restriction: you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

Right to object: you may object to our processing of your personal information pursuant to this Notice. Please contact us, providing details of your objection.

Right to make a complaint: you may make a complaint about our data processing activities by contacting us using the details in section 17 of this Notice. Alternatively, you may make a complaint to the UK supervisory authority, which is the Information Commissioner's Office, by visiting their website at www.ico.org.uk, by phoning 0303 123 1113 (local rate) / 01625 545 745 (national rate), or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Please note that in some cases:

(a) we may not be able to comply with your request (for example, we might not be able to delete your personal information) for reasons such as our own obligations to comply with other legal or regulatory requirements. We will always respond to any request you make and if we cannot comply with your request, we will tell you why;

(b) exercising some of these rights (including the right of erasure, the right of restriction and the right to withdraw consent) will mean we are unable to continue providing you with cover under your Ecoinsurance and may therefore result in cancellation of your Ecoinsurance. You will therefore lose the right to bring any claim or receive any benefit under your Ecoinsurance, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy documents will set out what will happen in the event that your Ecoinsurance is cancelled.

14. Your responsibility to provide accurate information

It is your responsibility to provide accurate and complete information as it may affect your Ecoinsurance. If you do not do so, it could result in the price of your Ecoinsurance increasing, your quotation or claim being rejected, your claim settlement payment being reduced and/or your Ecoinsurance being cancelled or made void (treated as though it never existed).

15. How will we keep your personal information secure?

We will treat all of your personal information in strict confidence and we will take all reasonable steps to keep your personal information secure once it has been transferred to our systems. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information. Please note that we cannot guarantee the security of any data you disclose to us online. You accept the inherent security risks of providing personal information and dealing online and will not hold us responsible for any loss or damage that you incur.

16. Changes to this Notice

We may modify this Notice from time to time, so please review it regularly. We will let you know when we make any material changes to the Notice by an announcement on our website homepage or, if appropriate, by contacting you directly. This Notice was last amended on 25 September 2020.

17. How can we be contacted?

If you have any queries relating to this Notice or our use of your personal information or wish to exercise any of your rights, please contact our Data Protection Officer by email at dataprotection@markerstudy.com or by letter to Data Protection Officer, 2nd Floor, Arndale House, 122A Market Street, Manchester M4 3AG. Alternatively, please call our Operations team on 03457 46 46 46. Please note that calls may be monitored or recorded.