

## ACCREDITED UK/EU PRIVACY NOTICE

May 2024

This **privacy notice** sets out how Accredited Insurance uses and protects your personal data. This **privacy notice** is provided in a layered format so you can click through to the specific areas set out below.

### 1. IMPORTANT INFORMATION AND WHO WE ARE

#### Privacy notice

This **privacy notice** gives you information about how Accredited collects and uses your personal data through your use of this **website**, including any data you may provide when you purchase a product.

#### CONTROLLER

Accredited Insurance Holdings, Inc. (Group) is made up of different legal entities, details of which can be found below. This **privacy notice** is issued on behalf of the Group so when we mention “Accredited”, “we”, “us” or “our” in this **privacy notice**, we are referring to the relevant company in the Group. The company responsible for the collection and processing of your personal data is dependent on the region in which you reside as set out below:

- **EU:** Accredited Insurance (Europe) Limited, 3rd Floor, Development House, St Anne Street, Floriana, FRN 9010, Malta
- **UK:** Accredited Insurance (UK) Limited 71 Fenchurch Street, London, EC3M 4BS

We have appointed a data protection officer (DPO) 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 DPO using the information set out in the contact details Section 10.

### 2. THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity data includes first name, last name, policy number or similar identifier, marital status, title, driving licence, passport, vehicle registration number, date of birth, gender, national insurance number or other tax identifier.
- Contact data includes address, email address and telephone numbers.
- Financial data includes bank account details, credit reference agency data.
- Insurance data, insurance history, including details of any claims you have made and/or accidents you have been involved in.
- Health data, including details of medical issues that are relevant to a policy you hold or have applied for.
- Criminal record data such as convictions for driving offences.
- Marketing and Communications Data includes your preferences in receiving marketing from us.

We may also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific **website** feature to analyse general trends in how users are interacting with our **website** to help improve the **website** and our service offering.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Your interactions with us. You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our policies;
  - notify us of a claim;
  - request marketing to be sent to you.

#### **Third parties or publicly available sources.**

We may receive personal data about you from various third parties and public sources regarding your insurance and claims history as set out below:

- Insurance brokers, agents, and our business partners;
- Insurance industry bodies such as the Association of British Insurers and the Motor Insurers Bureau;
- Governmental and regulatory bodies including the Driver and Vehicle Licensing Agency and the Driver and Vehicle Standards Agency;
- Financial crime, fraud, credit, and law enforcement agencies.

### 4. HOW WE USE YOUR PERSONAL DATA

#### LEGAL BASIS

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

**Performance of a contract with you:** Where we need to perform the contract, we are about to enter into or have entered into with you.

**Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

**Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of Data	Legal Basis
Managing policy applications and renewals. Administration of the policy throughout the policy term including the creation and maintenance of policyholder records.	Identity Contact Financial Health Criminal	Performance of a contract with you Legal obligation Consent Legitimate interests
Claims management, assessment, and management of claims from notification to settlement or closure.	Identity Contact Insurance Health Financial	Performance of a contract with you Legal obligation Legitimate interests
Complaints handling, including complaints sent to the Financial Ombudsman Service	Identity Contact Insurance	Performance of a contract with you legitimate interests Legal obligation
Fraud and crime prevention, sharing data with third party anti-fraud agencies such as the Motor Insurance Bureau, The Claims and Underwriting Exchange and law enforcement agencies	Identity Contact Insurance	Legal obligation Legitimate interests
Marketing and subscriptions	Identity Contact	Consent
To administer and protect our business and this <b>website</b> including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, internal auditing, and reporting requirements	Identity Contact	Legitimate interests

#### DIRECT MARKETING

You will receive marketing communications from us if you subscribe to our newsletters. You can ask us to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you.

#### COOKIES

For more information about the cookies we use and how to change your cookie preferences, please see our cookie policy.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data where necessary with certain third parties for the purposes set out in the table above. Third parties may include intermediaries, insurers, reinsurers, claims handlers, loss adjustors, law enforcement agencies, government bodies, financial services regulators, third party service providers and other business partners.

Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this **privacy notice**.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

We may share your personal data within the Accredited Group. This will involve transferring your data outside the EU or UK to our overseas offices in the United States

Whenever we transfer your personal data out of the EU or UK to countries which have laws that do not provide the same level of data protection as EU or UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented.

We use specific standard contractual terms approved for use in the EU and UK which give the transferred personal data the same protection as it has in the EU and UK, namely the European commission's Standard Contractual Clauses for transfers from the EU and International Data Transfer Agreement for transfers from the UK.

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the EU or UK to countries which have laws that do not provide the same level of data protection as EU or UK law.

Whenever we transfer your personal data out of the EU or UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place.

We may use specific standard contractual terms approved for use in the EU or UK which give the transferred personal data the same protection as it has in the EU or UK, namely the European Commission's standard contractual clauses for international transfers from the EU or the International Data Transfer Agreement for international transfers from the UK.

## **7. 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 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 put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the 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.

In some circumstances you can ask us to delete your data: see Section 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further **notice** to you.

## 9. YOUR LEGAL RIGHTS

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

**Request access** to your personal data (commonly known as a “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate

that we have compelling legitimate grounds to process your information which override your right to object.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

**Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:

- If you want us to establish the data's accuracy;
- Where our use of the data is unlawful, but you do not want us to erase it;
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us by email at [privacy@accredited-eu.com](mailto:privacy@accredited-eu.com) see Contact details ([Paragraph 10](#)).

#### NO FEE USUALLY REQUIRED

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. Alternatively, we could refuse to comply with your request in these circumstances.

#### WHAT WE MAY NEED FROM YOU

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.

#### TIME LIMIT TO RESPOND

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 and keep you updated.

## 10. CONTACT DETAILS

If you have any questions about this **privacy notice** or about the use of your personal data or you want to exercise your **privacy** rights, please contact our DPO in the following ways:

**Email address:** [privacy@accredited-eu.com](mailto:privacy@accredited-eu.com)

**Postal address:** Data Protection Officer, Accredited Insurance, 71 Fenchurch Street, London, EC3M 4BS.

## 11. COMPLAINTS

You have the right to make a complaint at any time to the Supervisory Authority responsible for regulating data protection issues in your jurisdiction.

- **UK:** Information Commissioner's Office (ICO) [www.ico.org.uk](http://www.ico.org.uk).
- **EU:** Please visit the EDPB website for the relevant Supervisory Authority contact details [Our Members | European Data Protection Board \(europa.eu\)](http://europa.eu)

We would, however, appreciate the chance to deal with your concerns before you approach a Supervisory Authority, so please contact us in the first instance.

## 12. CHANGES TO THE **PRIVACY NOTICE**

We keep our **privacy notice** under regular review. This version was last updated on **17 May 2024**.

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, for example a new address or email address.