



Privacy Notice

1. Who we are

Reliance Insurance Agency Limited trading as Reliance Insurance Brokers (company number) is registered as a company in England and Wales, with our registered address at 138 Quay Road, Bridlington, East Yorkshire, YO16 4JB. We are a Private Limited Company.

In relation to the personal data we collect from and use, we are the ‘data controller.’ This means we decide the purpose and manner in which your personal data is used and processed. The Insurance Participants may also be data controllers of your personal data, and this is explained more fully below.

2. Sharing your personal data

Reliance may share your personal data in a number of ways:

- a) Reliance will also share personal data with Insurance Participants, who may be data controllers in their own right.
- b) We may also share your personal data with law enforcement bodies, reinsurers and regulators such as the Financial Conduct Authority, as is necessary and permitted by law.
- c) To assist us in providing insurance broking services to you, it is necessary for us to use third party suppliers. In using these third party suppliers, we often have to share and allow access to personal data to enable those third party suppliers to carry out the relevant services. If third party suppliers are using personal data to provide services on our behalf, they are known as ‘data processors’. Examples of important areas where we use third party suppliers (and therefore data processors) include for the purposes of:

- web and data hosting;
- cloud software;
- claims management;
- print production;
- market research;
- pricing and analytics;
- providing credit;
- credit searches;
- brand and product development;
- fraud prevention;
- compliance monitoring, quality management and audit; and
- debt management and collection.

We will ensure that any data processor we use has entered into a contract with us which fully sets out the data processor’s duties, including in relation to protecting the processing of your personal data.

3. The data we may collect about you (personal data)

The following is a list of the types of personal data we may collect and hold about you:

Types of personal data	Details
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers, gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you, vehicle and property details.
Identification details	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving license number.

Financial information	Bank account or payment card details, income or other financial information.
Risk details	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. For certain types of policy, this could also include telematics data.
Policy information	Information about the quotes you receive and policies you take out.
Credit and anti-fraud data	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you.
Previous and current claims	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.

Some of the personal data you share with us may be what is known as ‘special category’ personal data. Certain categories of personal data have additional protection under data protection regulation due to its sensitivity. Special category data includes data relating to health, criminal convictions, racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric or data concerning sex life or sexual orientation. For the purposes of this notice, we should only process special category relating to health or criminal convictions.

4. Where we might collect your personal data from

We may receive your personal data through various channels; over the phone, through our website, face to face and directly through secure transfer from other Insurance Participants.

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

- you;
- your family members, employer or representative;
- other Insurance 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 the other party to the claim (claimant/defendant), witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers

The particular sources which apply in each case will depend on the context and your particular circumstances.

Disclosing other people's information to us

You should show this notice to anyone whose personal data you provide to Reliance. You must ensure that any such personal data you supply relating to anyone else is accurate and that you have obtained their consent to the use of their personal data for the purposes set out above. Where you authorise a third party on the policy, it is our standard practice to speak to either you or the third party regarding the policy, after completing relevant identity checks.

5. Identities of data controllers and data protection contacts

We are an insurance broker, which means that we will present quotes and incept policies from our panel of insurers. Some of these are intermediaries who will provide quotes to us from their own panel of insurers.

In order for us to provide our insurance broking services, your personal data is shared between Insurance Participants, including our insurance panel members, some of which you will not have direct contact with. Whilst Reliance is the data controller of any data it collects or uses, during the insurance journey, other Insurance Participants may also be a data controller. The initial data controller depends on how you have taken out your policy:

- Where your employer or another organisation took out the policy for your benefit: you should contact your employer or the organisation that took out the policy who should 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 Participants that they have passed your personal data to.
- Where you are not the policy holder or an insured: you should contact the organisation that collected your personal data who should provide you with details of the relevant data protection contact.

Our insurance panel members

Who we share your personal data with, will depend upon whether you request a quote for a non-business policy, such as a personal motor policy or home policy, or whether you are a business customer. Further details are available on request.

6. The purposes and legal grounds we use for processing your personal data

Reliance will use and process your personal data in a variety of ways or 'purposes' A full list of the purposes we use is found here in order to provide services to you as an insurance broker. We must have a legal ground to process that personal data for the activity we are undertaking.

A summary of the legal grounds we use to personal data, are set out as follows:

(i) In order to provide you with insurance quotes, set up and maintain your insurance policy, carry out fraud and credit checks, and handle claims, the legal ground for processing your personal data is that it is necessary for the performance of your insurance policy;

Failure to provide the requested personal data may mean we are unable to obtain a quote or incept a policy for you.

(ii) For the following purposes for processing data, the legal ground we use to process that personal data is that it is necessary to fulfil our legitimate interests. Therefore, it is in our legitimate interest to process personal data for the purposes of:–

- network and information security,
- pricing modelling and analytics,
- defence and prosecution of legal claims,
- investigation or prosecution of fraud,

- transfer books of business, sale or reorganisations of the business
- direct marketing by post and phone

Further information on how we assess our legitimate interests can be made available on request.

7. Marketing

We do not sell or pass on your details to any third parties for the purposes of marketing their own products or services.

8. Profiling and automated processing of personal data

When calculating insurance premiums Insurance Participants may compare your personal data against industry averages. Your personal data may also be used to create the industry averages going forward. This is known as profiling and is used to ensure premiums reflect risk.

Profiling may also be used by Insurance Participants to assess personal data you provide to understand fraud patterns.

Where special categories of personal data are relevant, such as medical history or past motoring convictions for motor insurance, your special categories of data may also be used for profiling.

Insurance Participants might make some decisions based on profiling and without human intervention (known as automatic decision making).

The legal ground Reliance uses to carry out automated processing is that it is necessary for the purposes of entering into, or performance, of your insurance policy. Reliance uses automated processing for the following purposes:-

(i) Fraud prevention and detection

In order to prevent or detect fraud we will check your details with various fraud prevention agencies and anti-fraud databases, who may record a search. These checks include processing conducted automatically by computers.

Insurers pass information to the Claims Underwriting Exchange database, run by the Motor Insurers' Bureau (MIB). The aim is to help us check information provided and also to prevent fraudulent claims. We may at any time search the database including when we deal with your request for insurance.

If fraud is suspected, information will be shared with insurers and fraud prevention agencies.

Under the conditions of your policy, you must tell us about any incident (such as an accident or theft) which may or may not give rise to a claim. When you tell us about an incident we will pass information relating to it, to our claims management business partners. All telephone calls relating to applications and claims may be monitored and recorded and the recordings used for fraud prevention and detection, training and quality control purposes.

We may also share your information with law enforcement agencies, other organisations and public bodies where we reasonably believe it is necessary for the prevention and detection of fraud, crime or where required to do so under a court order.

If your application for insurance has been declined and you believe this to be incorrect please explain why to a member of staff who will review the circumstances. You can contact us on 0800 1164181.

(ii) Credit reference checks

Soft Search

Reliance Insurance and our Insurers will conduct credit reference checks at one or more of the UK's credit reference agencies ("CRAs"). In all cases these checks will be carried out to confirm identity, help prevent fraud and calculate premiums. This is a soft search which means it is only visible to you (if you request a copy of your credit file at the credit reference agencies) and is not visible to other organisations. This type of credit reference check will not affect your credit file.

The search will be visible on your credit report but it won't affect your credit rating as it's not an application for credit. The CRAs may add the details of our searches and personal data that we hold about you to their records relating to you.

Contacting Credit Reference Agencies

You can contact the CRAs currently operating in the UK (CallCredit, Equifax and Experian) to find out what information they hold about you. The information they hold may not be the same so you may wish to contact more than one. Their details are below. They are entitled charge you a small statutory fee.

Call Credit, 0330 024 7574 or log on to www.callcredit.co.uk.

Equifax, Equifax Ltd Customer Service Centre, PO Box 10036, Leicester , LE3 4FS, 0333 3214043 or log on to www.equifax.co.uk.

Experian, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF or call 0344 481 0800 or log on to www.experian.co.uk

Both types of credit checks as described above may be completed when obtaining a quote for you, whenever you change or renew the policy, to offer payment options and to calculate premiums.

If you would like further information on any of this automated processing you can contact us on 01924 365 639.

(iii) Risk analytics and insurance premium pricing

We will process your personal data to determine premium pricing, and assess a number of risk rating factors relating to your insurance policy.

(iv) Marketing

We will process your personal data to enable us to develop, review and improve the services which we offer and to enable us to provide you with relevant information through our marketing programme.

We may use your information to make decisions about you using technology to track or profile your, online journey, such as how you arrive on our website and for assessing which products might be most suitable for you.

If you believe the outcome of any automated processing has resulted in an outcome that you did not expect please explain why to a member of staff who will review the circumstances. You can contact us on 0800 1164181 to explain the circumstances.

9. Cookies

A cookie is a small text file that can be stored on your computer/device and is a standard feature on most modern websites in order to support your browser whilst navigating, to keep your website preferences and help to tailor your online experience.

We use cookies for a number of things. If you would like to read about them in more detail please see our full Cookie Policy on our website where we have listed which cookies we use and how to remove them from your device.

10. Retention of your personal data

Reliance will delete personal data in line with its retention policies. Personal data will be retained for the minimum amount of time necessary for each type of activity that we conduct.

For the purposes of supporting our complaint handling, quality management, regulatory requirements and to defend against legal claims, personal data associated with the provision of quotes, inceptions and management of policies will be retained for a maximum of seven years from the conclusion of your relationship with us.

Personal data will be retained for 11 years for the purpose of analysing and assessing risk in relation to insurance claims.

Personal data relating to quotes requested and subsequently not taken up by you will only be processed for marketing purposes for four years. Should you wish to stop receiving any form of marketing contact please let us know.

Call recordings will be retained for three years. Certain call recordings may be held for longer in the event that they are required to support specific regulatory investigations, complaints handling or the prevention and detection of crime.

Reliance work with Insurance panel members in order to provide you with a quote and incept insurance. Insurers will retain and delete personal data according to their own retention policies and you should ensure you read the insurers privacy policy, in respect of your personal data processed and retained by them.

Personal data relating to quotes requested and subsequently not taken up by you will only be processed for marketing purposes for four years. Should you wish to stop receiving any form of marketing contact please let us know.

Reliance work with Insurance panel members in order to provide you with a quote and incept insurance. Insurers will retain and delete personal data according to their own retention policies and you should ensure you read the insurers privacy policy, in respect of your personal data processed and retained by them.

11. Your rights and contact details of the ICO

As we control how your personal data is used, we are the data controller and you are the 'data subject.' Under data protection regulations you have rights as a data subject. You may have the right as a data subject to require us to:

- provide you with further details on the use we make of your personal data including special category data;
- provide you with a copy of the personal data you have provided to us;
- provide information that you have provided to us to either you or a third party in a reusable format;
- update any inaccuracies in the personal data we hold about you;
- delete any special category of data/personal data that we no longer have a lawful ground to use;
- where you have consented to Reliance processing your personal data for a particular purpose, to withdraw your consent so that we stop that particular processing;
- object to any processing based on the legal ground Reliance is processing it in its legitimate interests 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 protect public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). We will explain this to you as necessary.

Request about my personal data

You are entitled to request a copy of or amend the data we hold about you.

Appendix A

List of legal grounds we rely upon

Legal Ground	For processing personal data and special categories of personal data
Performance of our contract with you	Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
Protection of vital interests of you or another person	Processing is necessary in order to protect the vital interests of you or another natural person.
In the public interest	Processing is necessary for the performance of a task carried out in the public interest.
For our legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you are a child. These legitimate interests are set out next to each purpose.
	For processing special categories of personal data
Your explicit consent (optional)	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent , by contacting our Data Protection contact.
Your explicit consent (necessary)	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting our Data Protection contact.
Protection of vital interests of you or another person, where you are unable to consent	Processing is necessary to protect the vital interests of you or of another natural person where you are physically or legally incapable of giving consent.
For legal claims	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
In the substantial public interest	Processing is necessary for reasons of substantial public interest, on the basis of EU or UK law.
For health services	Processing is necessary for the purposes of preventative or occupational medicine, for medical diagnosis, the provision of health or social care or treatment on the basis of EU or UK law or pursuant to contract with a health professional who I under legal or professional obligations of secrecy.