

CO-OP CAR OR HOME INSURANCE - PRIVACY NOTICE

1. What is this Notice?

The purpose of this notice is to explain how and why your personal information will be collected, used and shared by us and also explains your data protection rights.

If you would like to receive this notice in an alternative format such as large print, audio or braille, please let us know.

In this notice, references to **you** or **your** shall include anyone requesting an insurance quote from us or whose details are provided to us during the quotation process, policyholders and anyone named or covered by our Car or Home insurance products (**Car or Home Insurance**) and anyone who may benefit from or be directly involved in the Car or Home Insurance or a claim including claimants and witnesses.

If you decide to purchase Car or Home Insurance, this notice should be read together with your policy documents.

2. Who are we?

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.

When we use the terms **we**, **us**, **our** then it refers to Co-op Insurance Services and MSG.

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 Co-op Insurance Services for the purposes set out in the 'How do we use your personal information?' section below.

Other data controllers

When you take out a Car or Home Insurance policy then a third party insurer will also be a data controller for the purposes of data protection law.

If you have elected to have a telematics unit, VisionTrack is also a data controller in respect of the data collected via that unit. It will also act as a data processor for us in respect of some data.

Depending on how you were introduced to us there may be other companies who will also be considered a data controller. This could include, for example: a company who has appointed us to provide insurance services on their behalf e.g. price comparison websites.

Depending upon the types of ancillary services you choose to receive during your quote or renewal journey, other companies may also be considered a data controller in respect of those ancillary services.

More information about third parties can be found in the section below entitled 'Who do we share the information we collect about you with?'

Where a third party data controller is involved in the provision of the insurance and ancillary services to you, we recommend that you also review their privacy notices as this will tell you how they will process your information.

3. Who do MSG collect information about?

MSG collect information about the following types of individuals:

- previous, current and prospective customers/policyholders;
- previous, current and prospective parties covered under an insurance policy;
- person's authorised to speak to MSG on behalf of a customer or policy holder;
- third party claimants;
- witnesses to incidents;
- experts instructed in relation to claims;
- business partners;
- if you have elected to have a telematics unit, drivers of the vehicle, although MSG will not know who is driving the vehicle at any particular time.

4. When do MSG collect information about you?

MSG collect information about you:

- when MSG are providing you with a quotation when you apply for, amend or renew a policy;
- when you claim under a policy;
- when you contact MSG (by phone, email, through MSG's website or otherwise) such as to update or check your details, complete surveys, provide feedback, fill in forms, participate in competitions or complete applications for insurance policies or other goods/services;
- when you register to use MSG's website, subscribe to MSG's services, search for a product, place an order on MSG's website, participate in discussion boards or other social media functions on MSG's website, leave any query or correspondence on MSG's website, enter a competition, promotion or survey or when you report a problem with MSG's website or any other activity undertaken by MSG;
- from third party databases (for example claims underwriting exchange and government agencies);
- when you contact MSG to make a complaint;
- from third parties who are involved with the quote or renewal journey, for example a price comparison website that you use to find your insurance;
- if you have elected to have a telematics unit, the system normally collects information while your vehicle is being used and transmit this to MSG and/or MSG's suppliers some time later. Instances where the telematics systems may send real-time data and alerts to MSG include where a collision or crash is detected, if the device's tamper alerts are activated, or if it is at

your request, for example if your vehicle has been stolen and a theft tracking service has been activated or you request the last known location of your vehicle.

5. How is your personal information collected?

MSG (directly or through its authorised agents) will collect your personal information from:

- (a) you directly including personal information captured during the sales process or as part of the claims administration;
- (b) someone else acting on your behalf who gives MSG the personal information directly;
- (c) other parties involved such as claimants, witnesses, experts, medical representatives and accident management companies;
- (d) publically available sources such as social media and the electoral register;
- (e) fraud prevention and detection agencies, organisations and databases;
- (f) credit providers, payment processing parties and credit reference agencies;
- (g) insurance investigators and claims service providers;
- (h) government and law enforcement agencies;
- (i) from other resources and third parties (including brokers, price comparison websites, insurance companies, business partners, suppliers, risk assessment models, pricing data, statistics and other information from public databases, websites and other sources);
- (j) from the telematics unit if applicable.

If you are applying for Car or Home Insurance jointly with someone else, you must ensure that you have permission from the other party before:

- (a) sharing information about them with MSG; and
- (b) authorising MSG to search, link or record information at credit reference agencies about them.

6. What kind of personal information is collected from you?

MSG will collect and retain your personal information when, for example, you complete an application for Car or Home Insurance online or by telephone, renew your policy, make a claim and/or complaint and when you contact MSG generally. The type of personal information that MSG collects will depend on your relationship with it: different information can be required depending on the type of policy you are taking out, and whether you are a policyholder, covered party or beneficiary under a policy, website user, claimant, witness, expert, broker or other third party.

Please note, in certain circumstances MSG may request and/or receive sensitive personal information about you. For example MSG may need access to health records or details of any unspent criminal convictions for the purposes of providing you with a policy or processing claims, or for preventing, detecting and investigating fraud. MSG does not actively request other sensitive personal data but this information may be recorded as part of the quote, policy or claim administration.

MSG may typically collect personal information such as:

- **Basic details:** this includes your name and contact details, which allow MSG to communicate with you and resolve any queries or complaints that you may have. MSG and Co-op Insurance Services may also ask you for feedback to assess customer service and satisfaction and to improve overall operations.

- **Personal details and biographical information:** this may include, as relevant, your vehicle registration number, national insurance numbers, passport numbers, and personal description, which MSG may need in order to administer your policy (for example, for verifying your identity or otherwise dealing with claims investigations).
- **Images and audio:** this may include photographs, call recordings, video footage including CCTV recordings, which MSG may hold in relation to claims investigations or in respect of the security measures taken to protect MSG premises.
- **Driver information:** where you have a Car Insurance policy MSG will hold details of your driving licence and driving history, which may include tracking information or telematics data.
- **Payment details:** this allows MSG to process any payments or refunds in connection with your insurance policy. If you choose to pay for your insurance policy by direct debit, MSG will collect your bank account details and pass onto to the finance provider to process your regular payments to ensure your cover remains in force and you remain protected.
- **Previous claim details:** this allows MSG to determine the likelihood of you making a claim and this will be reflected in the price for your Car or Home Insurance, which may be higher.
- **Personal circumstances:** MSG may collect details about your personal circumstances where this is appropriate in the administration of your quote, policy or claim for example information to allow MSG to identify a potentially vulnerable customer, as well as other information you (or a third party) may provide to MSG as part of the quote, policy and/or claim administration processes whether through phone, email, letter, or via a website, app, social media or online chat.
- **Website Data:** MSG may collect information when you use the MSG website including data that allows MSG to monitor your preferences and how you use the website. This helps us to organise website content in order to improve your experience. The information MSG collects includes:
 - details of transactions you carry out through MSG's website;
 - information that you provide by filling in forms on MSG's website even if those forms are not submitted;
 - technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from MSG's website (including date and time);
 - products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- **Telematics Specific:** the unit will be used to capture date, time, speed, location and other associated vehicle and driving related information from your vehicle. This information includes date, time, latitude, longitude, speed, duration, distance, acceleration, braking, cornering and other associated vehicle information, including vehicle performance data.
- **Special Category Personal Data and Criminal Conviction and Offences Information:**
 - Details about your health but only if this information is pertinent to:
 - (i) the quote (for example medical conditions which are notifiable to the DVLA) to ensure you have the right product and that you don't find yourself with an invalid policy should you come to make a claim;
 - (ii) policy administration (for example to help MSG to identify a potentially vulnerable customer);

- (iii) a claim (for example to establish the quantum of damages sought and potentially recoverable under the policy); and
 - (iv) fraud prevention investigations.
- Information relating to your criminal history (including offences and alleged offences and any caution, court sentence or criminal conviction) but only if this information is pertinent to:
 - (i) the quote process because if you have been convicted of a motoring offence or received a fixed penalty notice, insurers will see you as a greater risk and this will be reflected in the price for your insurance, which may be higher;
 - (ii) policy administration (for example when you update MSG of any changes to your driving licence); and
 - (iii) fraud prevention investigations.
- MSG do not actively request details about your race and/or ethnicity but this information may be recorded if it is pertinent to:
 - (i) a claim (for example a physical description is given at the time of the incident resulting in the claim or in a later medical report or investigator report);
 - (ii) a complaint (for example an allegation is made by you of racial discrimination); or
 - (iii) fraud prevention investigations. It may also be recorded if it is provided by you (or a third party) as part of the quote, policy and/or claim administration processes whether through phone, email, letter, or via a website, app, social media or online chat.
- MSG do not actively request details about your political opinions, religious or philosophical beliefs or trade union membership but this information may be recorded if it is provided by you (or a third party) as part of the quote, policy and/or claim administration processes whether through phone, email, letter, or via a website, app, social media or online chat.
- MSG do not actively request details concerning your sex life and/or sexual orientation but this information may be recorded if it is provided by you (or a third party) as part of the quote, policy and/or claim administration processes whether through phone, email, letter, or via a website, app, social media or online chat. In addition this information may be apparent from other information you have provided (for example details of your spouse if he/she is a named driver on the policy). Further this information may, in certain limited circumstances, be recorded in a medical report if that information is pertinent to a claim under the policy.

7. How do we use your personal information?

Co-op Insurance Services may use your personal information:

- (a) if you are a Co-op member, to fulfil any Co-op Group membership scheme requirements;
- (b) to manage the overall performance of the Car and Home Insurance and to monitor the performance of MSG and the selected third party insurer;

(c) to ask for your feedback, assess customer service and satisfaction and to improve overall operations;

(d) to improve existing products and services and to develop new products and services for you. This includes the use of your quote information (whether you buy a policy or not);

(e) to help Co-op Insurance Services improve its service and marketing communications with you, so that you can be contacted at the most appropriate time with relevant offers;

(f) to develop an understanding of the activities, preferences and requirements of you, Co-op members and customers.

MSG will use your personal information:

(a) to help process any quotation application(s) you make;

(b) to arrange and manage your Car or Home Insurance, including underwriting and claims handling (this may include disclosing your personal information to third party insurers and claims handling agents). Part of this administration may include:

(i) to set you up as a policyholder including carrying out fraud, credit and anti-money laundering checks;

(ii) to evaluate your application and ability to pay for your policy by instalments (if applicable);

(iii) to provide you with a renewal quote when your policy is due to expire.

(c) to confirm and update your customer record;

(d) to process any payments, fees and charges owed by you in respect of any policy that you have taken out and to collect and recover any monies owed for any other purpose e.g. excess charges in respect of windscreen damage;

(e) to monitor the performance of any agent acting on its behalf who provides services to you under the Car or Home Insurance;

(f) to ask for your feedback, assess customer service and satisfaction, resolve any complaints and to improve overall operations;

(g) for the analysis and the prevention of fraud. This might include sharing your personal information with third parties such as the police, insurance industry fraud prevention and detection databases, and other insurance and financial services providers;

(h) to comply with any legal or regulatory obligation;

(i) to administer the website and to personalise your repeat visits to the website;

(j) providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics;

(k) communicating with you and resolving any complaints that you might have;

(l) to transfer to third parties for the purpose of providing you with the services required under the insurance contract or other services which you have elected to receive from MSG in connection with the insurance contract; and

(m) to provide data analysis in order to assist us with the pricing of our products and detect market trends.

8. Marketing

Co-op Insurance Services use your personal information to send offers to you about other Co-op Insurance products and services that may be of interest to you. Co-op Insurance Services will only do this when you have indicated you wish to receive this and by the means you have requested for example by email, post or telephone.

If you have agreed to receive marketing, Co-op Insurance Services may also send offers to you via social media such as Facebook or Twitter. When your personal information is shared with a social media company it is done in a secure way to ensure your contact details are not visible to them or any other third party and can only be used for Co-op Insurance Services marketing purposes.

Co-op Insurance Services will not send these offers to you if you have opted out of receiving marketing. If you have opted in and you change your mind, you will be able to opt-out at any time by contacting Co-op Insurance Services using the details below:

Write: Data Protection Officer
Markerstudy Group
45 Westerham Road
Bessels Green
Sevenoaks
TN13 2QB

Email: dataprotection@markerstudy.com

In accordance with the agreed service delivery arrangements, MSG manages all marketing opt-outs on behalf of Co-op Insurance Services.

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

Co-op Insurance Services and MSG will only use your personal information where it is permitted by law and where:

(a) you have given consent to use your personal information (if consent is needed for example for marketing);

(b) we need to use your personal information to provide you with an insurance quotation and to perform the insurance contract with you;

(c) we need to use your personal information to comply with legal or regulatory obligations;

(d) it is in our legitimate business interests and as such we will only use such personal information where those interests are not outweighed by your own interests of fundamental rights and freedoms. These legitimate interests typically correspond with the purposes we've set out in 'How do we use your personal information?' above.

(e) additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts.
- The use is necessary in order for us to establish, exercise or defend our legal rights

10. Who do we share your personal information with?

When we share your personal information, we only do so in accordance with our legal, data protection and privacy obligations.

Co-op Insurance Services may share your personal information with:

(a) third party suppliers who process and store your personal information on behalf of Co-op Insurance Services;

(b) professional advisors, for example Co-op Insurance Services may need to share your personal information with its auditors when they need to give professional advice;

(c) companies, brands and businesses within the Co-op Group. For example, if you are a Co-op Member, Co-op Insurance Services may share your personal information with the Co-op Membership team to ensure that you receive Co-op Membership rewards. Co-op Insurance Services may also share your personal information where part of the Co-op Group business is restructured and, for example, the responsibility for the services provided to you are transferred to another business within the Co-op Group.

(d) in circumstances whereby Co-op Insurance Services:

- (i) or substantially all of its assets, are acquired by a third party outside the Co-op Group;
- (ii) decides to use a replacement intermediary or third party insurer to service or underwrite your Car or Home Insurance;
- (iii) are under a duty to disclose or share your personal information to comply with legal obligations; or
- (iv) must protect its rights, property or the safety of its employees, members, customers or others.

MSG may share your personal information with:

(a) your relatives or guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with you such as your insurance broker or a price comparison website;

(b) where you have named an alternative contact (such as a relative) to speak with MSG on your behalf. Once you have told MSG your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with MSG and make changes on your behalf;

(c) carefully selected third party insurers and other companies involved in the quote process, such as price comparison websites;

(d) passing information to a third party for the purpose of validating your No Claims Discount (NCD) entitlement and this may be made available to other insurers;

(e) other companies with the Markerstudy Group and third party service providers who assist with the administration and servicing of the Car or Home Insurance such as a healthcare practitioner, solicitors, mechanics, loss adjusters, enquiry agents/counter fraud investigators, debt collectors;

(f) regulators and other authorised bodies, whenever required to do so by law;

(g) such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest;

(h) with Co-op Insurance Services to enable it to carry out the activities recorded in this notice.

(i) in relation to telematic data, MSG may also share your information with:

- search engine operators who can assist MSG in the improvement of its website;
- prospective buyers, in the event that MSG sell any business or assets.

11. Information collected and shared when you make a claim

If necessary, MSG may also use your personal information to investigate your claims and conviction history in the course of administering any claim you have made under your policy.

In the case of Car Insurance, insurers pass information to the Claims Underwriting and Exchange Register (**CUE**), run by Insurance Database Services (**IDS**) and the Motor Insurance Anti-Fraud and Theft Register, run by the Association of British Insurers (**ABI**). This helps insurers check information and prevent fraudulent claims.

When MSG deals with your request for insurance, MSG may search these registers. Under the conditions of your policy, you must tell MSG about any incident (such as an accident or theft) which may give rise to a claim. When you tell MSG about an incident, MSG will pass information to the Registers. Information relating to your insurance policy will be added to the Motor Insurance Database (**MID**) managed by the Motor Insurers' Bureau (**MIB**).

The MID and the data stored on it may be used by certain statutory and/or authorised bodies including the police, DVLA, DVANI, Insurance Fraud Bureau (IFB) and other bodies permitted by law for purposes not limited to but including:

- electronic licensing;
- continuous insurance enforcement and law enforcement (prevention, detection, apprehension and/or prosecution of offenders);
- 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 (either in the UK, the EEA or certain other territories), insurers and/or the MIB may search the MID to obtain relevant information.

Persons, including appointed representatives, pursuing a claim in respect of a road traffic accident (including citizens of other countries), may also obtain relevant information held on the MID.

It is vital that the MID holds your correct registration number. If incorrectly shown, you risk having your vehicle seized by the Police. You can check your registration number details at www.askmid.com.

12. Credit reference checks

In order to process your application, MSG may perform credit and identity checks on you with one or more credit reference agencies (**CRAs**). To do this, MSG will supply your personal information to CRAs and they will provide information about you, including any information contained on any credit application, your financial situation and your financial history. CRAs will supply to MSG both public (including the electoral register) and shared credit, financial situation and financial history and fraud prevention information. When a CRA receives a search from MSG, it will place a search footprint on your credit file that may be seen by other lenders.

MSG will use the information provided by CRAs to:

- assess your creditworthiness and whether you can afford to take the product;
- verify the accuracy of the data you have provided to MSG;
- prevent criminal activity, fraud and money laundering;
- manage your account(s);
- trace and recover debts; and
- ensure any offers provided to you are appropriate to your circumstances.

MSG will continue to exchange information about you with CRAs while you have a relationship with MSG. MSG will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

If you are making a joint application, or tell MSG that you have a spouse or financial associate, MSG will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at <https://www.transunion.co.uk/crain>.

CRAIN is also accessible from each of the three CRAs – clicking on any of these three links will also take you to the same CRAIN document:

- Call Credit: www.callcredit.co.uk/crain
- Equifax: www.equifax.co.uk/crain
- Experian: www.experian.co.uk/crain

13. Fraud prevention and detection

In order to prevent and detect fraud MSG may, at any time share information about you with other Markerstudy Group companies and with third party fraud detection databases. If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may also access and use this information.

MSG and other organisations may use this information to prevent fraud and money laundering, for example, when:

- checking details on applications for credit and credit related or other facilities;
- managing credit and credit related accounts or facilities;
- recovering debt;
- checking details on proposals and claims for all types of insurance.

Disclosure of your personal information to a third party outside of the Co-op Group or MSG will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which it is provided to them.

14. Will we transfer your personal information outside of the UK?

Co-op Insurance Services and MSG 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 (EEA). This will most likely occur where third party service providers are based outside the EEA.

If we do transfer your personal data to other jurisdictions, we will take proper steps to ensure that your information is adequately protected, such as entering into “standard data protection clauses” with the recipient. These are clauses that have been approved by the European Commission for such transfers.

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

As a principle, Co-op Insurance Services and MSG only keep 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 after your Car or Home Insurance has ended or any outstanding claim has been settled, whichever is the later, unless there is an exceptional business purpose in which case this time period needs to be extended. We do this to fulfil our regulatory and statutory obligations and to allow us to respond to any queries or concerns that may be raised in the future in relation to the cover we provided or how we handled a claim or complaint.

If you would like further information about our retention procedures, please contact us.

16. 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 in writing using the details at the end of this section.

Right to access your personal information: you may request access to a copy of your personal information. This is commonly known as making a 'subject access request'.

Right to rectification: you may ask us to rectify any inaccurate or incomplete information we hold about you.

Right to erasure: you may ask us to delete your personal information in certain circumstances. We may be unable to delete your personal information where we need to keep it to fulfil our regulatory and statutory obligations. For example, when you get a quote from MSG we shall keep the personal information you have given to us for a period of 13 months. MSG does this to check for fraudulent applications and to keep a record of whether you have given Co-op Insurance Services consent to send you marketing communications so that Co-op Insurance Services can comply with marketing rules.

When you take out a policy, MSG shall keep the quote and policy information for at least seven years after your cover has ended or from the date a claim was settled. As well as fulfilling regulatory and statutory obligations set by the Financial Conduct Authority (**FCA**), MSG retains your personal information in order to respond to any queries or concerns that may arise in relation to the cover provided and/or to address any issues relative to how MSG handled a claim or complaint.

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

Right to restriction of processing: you can ask us to restrict the processing of your personal information in certain circumstances. We may be unable to comply with your request where our processing is necessary for the establishment, exercise or defence of a legal claim. MSG also may be unable to restrict processing where it is unable to perform the insurance contract with you and is no longer able to offer you cover.

Right to object to processing: you may object to our processing of your personal information pursuant to this notice in certain circumstances. You always have the right to object to your personal information being used for marketing. However, where you object to MSG using your personal information for profiling for underwriting, pricing and fraud prevention purposes, or object to your personal information being processed outside the UK, this will mean MSG may not be able to perform the insurance contract with you and may not be able to continue providing you with cover.

The right not to be subject to automated decision-making (including profiling): you have a right not to be subject to automated decision-making and where automated decision-making used in the assessment of your application or fraud prevention, you can contact us to request that any declined decision is reconsidered. If you want to opt out of automatic decision-making, let us know, although in some circumstances it may mean we can't offer you a quote or policy as some automated decisions are necessary to provide your insurance policy.

Exercising your Rights

If you would like to exercise any of your data subject rights with regards to the data processed by please contact us using the details below:

Write: Data Protection Officer
Markerstudy Group
45 Westerham Road
Bessels Green
Sevenoaks
TN13 2QB

Email: dataprotection@markerstudy.com

If you wish to exercise these rights with regards to the data processed by Co-op Insurance Services, please contact Co-op Insurance Services using the details below:

Write: Data Protection Officer
Co-op Insurance Services
5th Floor
1 Angel Square
Manchester
M60 0AG

We aim to respond to your request within one month of receipt. We will always let you know if it is going to take us longer than this to respond. 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; and

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

Please note that calls may be monitored or recorded.

Making a complaint

If you are unhappy with the way in which your information has been processed, we would encourage you, in the first instance, to contact either the Data Protection Officer at Co-op Insurances Services or the Data Protection Officer at MSG (contact provided details above).

If you are unhappy with the response you receive, you may complain to the UK supervisory authority, which is the Information Commissioner's Office (**ICO**). Alternatively, you can complain direct to the ICO without referring to Co-op Insurances Services or MSG by either visiting the ICO's website at www.ico.org.uk or by writing to:

Information Customer Contact
Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

17. Your responsibility to provide accurate information

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

Where MSG ask you for personal information to perform contractual obligations in respect of your Car or Home Insurance or related services and you decline to provide that information, this may delay MSG's performance of the contract or prevent MSG from honouring its obligations under the contract, which may in turn prevent MSG from providing you with your Car or Home Insurance.

18. Do we use automated decision-making and profiling?

MSG may use your personal information in automated decision making processes to help determine the prices and policy terms, when you ask for a quote, buy Car or Home Insurance, make any changes,

renew or make a claim. MSG may supplement the information you provide with information from third parties who can provide more information about (including credit referencing agencies, DVLA databases, and land registries).

MSG will ask you when you purchase your policy if you would like to opt in to auto-renewal. However, even if you opted in at this point, you have the right to opt out at any point.

MSG use computers to automatically run fraud and money-laundering checks which helps to:

- decide whether someone might pose a fraud or money-laundering risk;
- decide whether their behaviour is similar to that of known fraudsters or money launderers;
- check against information we already have about them;
- check if they are hiding their true identity.

MSG may also profile you based on your personal information that has been provided by third parties. Profiling may be used to help determine the likelihood of a claim or policy transaction being fraudulent.

If you are a Co-op member, Co-op Insurance Services and MSG may use your personal information to provide benefits such as discounts on other Co-op Insurance products and services. This is sometimes referred to as 'profiling'.

Profiling will also be used to enhance Co-op Insurance Services' understanding of you and to inform business decisions (for example, product design, pricing, customer journeys or marketing strategy). If you've chosen to receive marketing information from Co-op Insurance Services, profiling will be used to make its marketing more relevant, for example personalise the channels used to market to you, the timing and the marketing messages used and the offers you're sent.

Our use of automated decision making is to help ensure that decisions are made accurately, fairly and efficiently.

You have rights not to be subject to automated decision making; please see the 'what are your rights' section above.

19. 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.

20. Changes to this Notice

This Notice was last amended on 17/07/2020.