

Privacy notice

The privacy and security of your data is important to us. This notice explains who we are, the types of information we hold, how we use it, who we share it with and how long we keep it. It also informs you of certain rights you have regarding your personal information under current data protection law.

We will update this notice as required and review at least annually.

1. About us

First Van is a trading name of Moorhouse Group Limited. Moorhouse Group Limited is the Data Controller of the information you provide us and is registered with the Information Commissioner's Office for the products and services we provide to you.

2. What information do we collect about you

Where we have collected information directly from you it will usually be obvious what this is, as you would have given it to us. This can be from our website, our app(s), by telephone, face to face or by email. We may also have used cookies to collect information from your computer or portable electronic device. *Please see our cookies policy.*

We may receive this information from insurers, other insurance brokers, price comparison sites and firms handling claims. It includes finance providers and firms that process or store our records. We may also receive your information from an introducer appointed representative or an external data company.

We collect and use this information as part of your insurance quotation or contract with us.

Sensitive personal information

We may need personal details, which might include your name and postal address, date of birth, telephone number, email address, credit/debit card details, bank details and criminal convictions. This may include details of members of your family, lifestyle, finances, business or education. Please ensure that you only provide us with sensitive information about other people with their agreement and you refer them to this privacy notice in order for them to understand how their information is collected, used, stored and also their rights.

3. When and how do we collect personal information?

- ✓ When you apply for a policy (such as submitting a request for a quotation), whether you complete that fully or not.
- ✓ When you renew a policy
- ✓ From claims service providers
- ✓ Whenever you use our website
- ✓ When you purchase a policy via an online comparison site offering our products
- ✓ Directly from you or from someone else on your behalf
- ✓ Through customer surveys and responses to various marketing campaigns
- ✓ From other third parties who provide a service in relation to your insurance policy such as an insurer, another broker, claims handlers and other service providers
- ✓ Through insurance industry fraud prevention and detection databases and sanction screening tools
- ✓ From inbound and outbound phone calls

4. What are the purposes for which your information is used?

We may process your personal information for a number of different purposes. For each purpose we must have a legal grounds for such processing.

Generally we will rely on the following legal grounds:-

- ✓ Where the processing is necessary for our provision of your insurance policy and services for activities such as assessing your application, managing your insurance policy, handling claims, recovery of any debt you owe and providing other services to you (contractual).
- ✓ Where we have an appropriate business need such as maintaining our business records or developing and improving our products and services where such business need does not harm your interests (legitimate interest).
- ✓ Where we have a legal or regulatory obligation to use such personal information.
- ✓ Where the use is necessary to establish, exercise or defend our legal rights.
- ✓ Where you have provided your consent to our use of our personal information.

Marketing

At the time your personal information was collected, we asked you to indicate your marketing preferences, which you can amend at any time. We may use your personal information to offer you suggestions about products and services you may wish to purchase.

We can use your personal information in this way because it is in our legitimate interest to provide you with the right information at the right time, however we will always ensure that we keep the amount of your personal information that we collect and the extent of any processing to the absolute minimum to meet this legitimate interest.

If you have chosen not to opt out of marketing, we will send you information about our products and services as agreed by email, post, telephone or SMS unless you tell us not to. If your information has been provided to us by a third party for marketing purposes we will rely on the consent you have provided to them to conduct direct marketing.

5. Who do we share your information with?

We may share your personal information with third parties and detail below information regarding the disclosure of such information. Should you have any further questions please contact our Compliance Team, contact details are available in section 11.

Disclosure to third parties, such as:-

Insurance partners which consist of Insurers, Insurance Intermediaries or reinsurers.

Insurance industry databases, such as the Claims and Underwriting Exchange where you make a claim so that insurers can check that your claims history is correct. The Insurance Fraud Register and the Employers' Liability Tracing Office.

Insurance industry bodies, such as the Motor Insurance Database to meet our Road Traffic Act obligations.

Government bodies, such as the Driver and Vehicle Licensing Agency.

Law enforcement or government agencies, fraud prevention agencies and we may permit such law enforcement or government agencies to access and use your personal information where necessary.

Credit reference agencies, this is shared to decide whether to offer you credit to pay your premium by instalments.

Also

Other third parties that assist with the administration of insurance policies, such as claims management companies

Our regulator, accountants, auditors, solicitors and other experts.

Debt collection agencies.

Our third party service providers such as IT suppliers, marketing agencies, payment processing agencies and Finance providers.

6. Automated decision-making

Please note that personal information, including sensitive personal information, may be used in the context of making insurance underwriting decisions, where information (such as criminal convictions data) is included as a standard question on a request for a quotation and also referenced for auto-renewal of certain types of policies. This involves automated decision making to determine what the cost of providing or renewing the policy will be. Automated decision making may also be used in relation to the marketing of our products to you, in accordance with preference you have expressed. Please see section 8 relating to your rights around automated decision-making. We will ask you when you purchase your policy if you would like to opt in to auto-renewal. However, even if you opt in at this point, you have the right to opt out at any time.

7. How long do we keep personal information?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal, statutory and regulatory obligations. For example, so long as there is any possibility that either you or we may wish to bring a legal claim under the insurance policy, or where we are required to keep your personal data due to legal or regulatory reasons. If you would like more information on this matter, our contact details are set out in section 11.

8. Your rights

Under data protection law you have certain legal rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in section 11.

In some cases we may not be able to comply with your request (e.g. we may not be able to delete your data) for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we are unable to comply with your request, we will tell you why.

Your rights include-

The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests.

The right to rectification

We make every effort to ensure the information we hold about you is accurate and complete, however if you do not believe this is the case you can ask us to update or amend it.

The right to erasure

In certain circumstances, you have the right to ask us to erase your personal information. There are occasions when a request made under data protection law is overridden by other legal and statutory data retention requirements.

The right to restriction or suspension of processing

In certain circumstances, such as a question over accuracy you are entitled to ask us to stop using your personal information or to suspend its use.

The right to data portability

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided us to another third party of your choice.

The right to object to marketing

You can ask us to stop sending you marketing messages at any time by either clicking unsubscribe or contacting our compliance team. Details in section 11

The right not to be subject to automated decision-making

You have a right not to be subject to a decision based solely on automated means. This includes auto-renewal, so if you have previously agreed to opt in to auto renewal and you change your mind you can opt out by contacting us.

The right to object to processing

For certain use of your personal information, we would have gained your consent and in other circumstances, we may process your data using legitimate interest. In both instances, you have the right to withdraw this right of processing, unless it is necessary in connection with our legal rights.

The right to lodge a complaint with the ICO

We hope that you would raise any concerns with us and give us the opportunity to resolve. However if this is not possible or you are dissatisfied with our resolution, you have a right to complain directly to the Information Commissioner's Office (ICO):-

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

Tel: 0303 123 1113 (local rate)

Further details of your rights can be obtained by visiting the ICO website at <https://ico.org.uk/your-data-matters>

9. Will we send your personal information overseas?

If we, or your insurer, have to transfer your personal data to a third country outside the EEA, we will only do so if a similar level of protection applies.

10. How we protect your information

We follow strict security procedures in the storage and disclosure of your personal information in line with industry practices, including storage in electronic and paper formats.

We restrict access to your information to those that absolutely need such information to carry out the purposes outlined in this Privacy Notice.

We use a range of organisation and technical security measures to protect your information and all our staff are trained on data security.

Firewalls are used to block unauthorised traffic to servers and these servers are located in a secure location which can only be accessed by authorised personnel. We have internal procedures in place that covers storage, access and disclosure of your information.

11. Contact us

If you have any questions about how we collect, store or use your personal information, you may contact us at:-

Compliance Department, Moorhouse Group Limited, Barclay House, 2-3 Sir Alfred Owen Way, Caerphilly. CF83 3HU

Or

Email: compliance@moorhousegroup.co.uk

12. Updates to this privacy policy (also known as fair processing notice)

If we change our privacy notice, we will post any changes on these pages so that you are always aware of how we use your information. This privacy notice was last updated in December 2021.