

Our Privacy Policy

City Underwriting Services Ltd is a company registered in Northern Ireland (NI065267), trading from Unit 26, Ormeau Business Park, 8 Cromac Avenue, Belfast, BT7 2JA. We are authorised and regulated by the Financial Conduct Authority under firm reference number 477589.

In order to comply with our responsibilities under the General Data Protection Regulations 2016 and the Data Protection Act 2018, we have an obligation to ensure we are clear with how your data is handled while in our possession.

The privacy of our policyholders, representatives & claimants and their data matters to us and we want to ensure they are clear on how we will use it. This policy provides details on what information and data we collect from them in relation to our business activities, why we need it, what we do with it, how we take care of it, who we will share it with what we won't do with it and their data subjects rights in relation to our processing of this data.

We provide insurance and underwriting services for the following:

- Commercial
- Own Goods
- Haulage
- Fleet (single to multiple vehicles)
- Taxi

Data Protection Principles

This policy has been developed to help the Company be compliant with the Regulations. The regulations clearly set out principles which any party handling data must comply with. These principles are that all data shall be:

- Processed fairly and lawfully
- Held only for specified purposes and not used or disclosed in any way incompatible with those purposes
- Adequate and relevant
- Accurate and up-to-date
- Not kept for longer than is necessary for the purpose it was collected
- Processed in accordance with the rights of data subjects
- Kept secure
- Not transferred outside the European Union

How will we collect information from you?

In order to arrange, place and administer policies we will collect information from you through our terms of business and through various forms. The type and level of information we collect will depend on which of our services are required by the policyholder, the representative or potentially the claimant. We will collect the information we require to provide these services through the following forms:

- Agency Application Form
- Proposal Form
- Incident Report – Accident Form
- Incident Report – Fire & Theft
- Accident Report Form
- Fire & Theft Report Form
- Additional Drivers Form
- Young Drivers Form
- Lost Certificate Form

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You will only need to complete the forms relevant to the services you require from us and those which we will need to ensure we meet our obligations to you in the provision of those services. Information may also be collected and provided to us through telephone conversations, email, sharing of documents (photocopies/email/fax) and other forms of communication which are needed to enable us to provide our services.

This information may be collected through a broker or other intermediary and passed to us, or in certain circumstances, you may need to supply the information directly.

What information will we collect from you?

The information we will need to collect from you will depend on the services you require from us and what information we will need to ensure the full provision of those services. The information collected may include:

- Policyholder
- Name(s)
- Address
- Contact numbers
- Email
- Date of birth
- Sex
- Nationality
- License details
- Vehicle details
- Driving history (including motoring convictions)
- Occupation
- Additional driver information (name, address, contact numbers, DOB, license details, driving history, occupation, motoring convictions and relationship to policyholder)

We will also need to collect further information in relation to any claims made by anyone we insure or in cases where claims are made against anyone we insure. The information collected may include:

- Details relating to accident claims
- Details relating to fire & theft claims
- Police statements
- Details of repairer (including contact details)
- Vehicle details & damage to vehicle(s)
- Other driver details to include – name, address, contact details, DOB, and license details
- Passenger details – name, address, contact details and DOB
- Witness Details – names, addresses and contact details

Not all of this data will be personally identifiable information.

On occasion, you will need to provide us with of 3rd party details (as listed above) and you should make them aware that you need to disclose their details and information to us.

What is our legal basis for processing your information?

Under the regulations, we may only use your information if we have a lawful basis for doing so. This means either we will have your consent, have a contractual, statutory or legal obligation to process the information in our possession.

How will we use the information you provide to us?

The information we collect from you will be used to:

- Deliver our services as per our agreed terms of business

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- Calculate premiums & policies
- Process and investigate claims
- Service policies
- Maintain our records
- Confirm your identity and to prevent fraud
- Deal with any claims submitted
- Investigate and deal with any complaints
- Verify any information you supply
- Invoice, billing and payment collection purposes
- Fulfil any statutory or legal obligation
- Provide statistical analysis
- Notify you of any additional services we provide which we feel may be of interest to you (If at any time you do not wish to receive emails or contact from us about these services you can opt out at any time by clicking 'unsubscribe' in the email or contact us directly)

Any information you provide us will not be used in any way you have not been informed about until you have been informed and we have your specific consent.

Who has access to your information?

The staff of the Company will have access to the information you provide to us. The information they have access to is controlled and they can only access the information required to ensure the services we provide to our clients are met.

Regulators, such as the FCA (Financial Conduct Authority), the ICO (Information Commissioners Office) may request certain information to ensure we are conducting and providing our services in line with regulations.

We may need to provide access to or share your information with 3rd parties in order to provide certain aspects of our service(s) or to fulfil statutory and legal obligations. Examples of these 3rd parties may include the Police Service of Northern Ireland, any solicitors engaged on our behalf in relation to claims and in exceptional circumstances surveillance companies in the case of personal injury claims made by non-policyholders.

Insurers pass information to the Claims and Underwriting Exchange Register (CUE), which is run by Insurance Database Services. IDS Ltd and the Motor Insurance Anti-Fraud and Theft Register, run by the Association of British Insurers (ABI). The aim is to help us check information and to prevent fraudulent claims. When we deal with your request for insurance we may search these registers. Under the conditions of your policy, you must tell us about any incident which may or may not give rise to a claim, we may pass as required information relating to it to the registers.

Policy information will be passed by the Company to Motor Data Solutions (MDS) who are authorised by certain syndicates' at Lloyd's to supply your policy details to the Motor Insurance Database (MID). The MID is run by the Motor Insurance Information Centre (MIIC). The aim of the MID is to prevent uninsured vehicles from driving on our roads. The police may use this database to confirm a vehicle is insured and establish who is insured to drive the vehicle. If you are involved in an accident in the UK or abroad other insurers, the MIB and MIIC may search the MID to obtain relevant policy information.

Where we may need to share information to 3rd parties outside of those detailed above we will do so only in accordance with any lawful obligation.

How long will we keep your information?

As a company, we have statutory and legal obligations to keep information for a period of time after it has been used. We will not keep any information after it has been used that we are not required to keep under these obligations.

Once information is no longer required it will be erased from our systems in a controlled and secure manner.

How will we protect your information?

We will endeavour to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect your personal information from loss and unauthorised access, copying, use, modification or disclosure.

Changes to this Privacy Policy

Our business may change from time to time. As a result, it may be necessary for us to make changes to this policy. We would ask you review this policy periodically, either by ***viewing it on our website or making a request for an updated version***. This policy was last updated on ***Date***.

The rights of data subjects

The Regulation sets out the following rights applicable to data subjects:

- The right to be informed – You have the right to be informed how your data will be collected, what type of data will be collected, how it will be used, how it will be protected, who it will be shared with, if it will be transferred outside the EU, how long it will be kept and how you can request copies.
- The right of access – You have the right to request copies of the data we hold on you but not on other individuals. We will provide a first copy free of charge but an additional copy will incur a fee.
- The right to rectification – You have the right to ask us to rectify any of the data we hold if you believe it to be incorrect. We may ask you for evidence to support any rectifications or changes.
- The right to erasure (also known as the ‘right to be forgotten’) – You have the right, in certain circumstances, to have the data we hold on you erased. If we have a legal or statutory obligation to keep the data we cannot erase it, but we will inform you of any instances where this applies.
- The right to restrict processing – You have the right, in certain circumstances, to ask us to restrict the processing of your data. If you believe the data is incorrect or being processed unlawfully you may request we restrict the processing without deleting the data.
- The right to data portability – You have the right to request copies of the data we hold on you in an electronic or machine-readable format.
- The right to object – You have the right at any time to object to how any data we hold on you is processed. Please see ***‘Requesting information and complaints’*** below for how to contact us.

Requesting information and complaints

Our clients can request details of the information held by the Company which relates to them. You can do this by emailing our Data Protection Officer at info@cityuws.com.

If at any time a client is unhappy with how the Company has processed or processes their data, you wish to make alterations to any data which you believe is incorrect, irrelevant, wishes to make an erasure request or wishes to stop hearing from us you can raise this issue with our appointed Data Protection Officer at info@cityuws.com. We will respond to any requests within the timescales defined in the Regulations.

If you feel your request was not handled or dealt with correctly by the Company you may raise the issue with the Information Commissioners Office, you can contact them on 0303 123 1113.