



Privacy Statement 2019

Think Insurance Services Limited and its affiliated companies and subsidiaries respect your privacy. This Privacy Policy Statement describes the ways we collect information from and about you, and what we do with the information, so that you may decide whether or not to provide information to us. By accessing our website or purchasing our products or services you agree to this Privacy Statement in addition to any other agreements we might have with you. This Privacy Statement does not govern the practices of entities that our Company does not own or control, or entities that do not own or control our company or people that our Company does not employ or manage. This Privacy Policy Statement includes the Company's Privacy Policy Statement.

1.Data Controller

The data controller is Think Insurance Services Limited, registered in England & Wales (No.06809003), registered address at Think Insurance Services Ltd, Suite 1, 1st Floor, 26 Newhall Street, Walsall, WS1 3DZ. In this Privacy Policy, 'we,' 'us' and 'our' means Think Insurance Services Limited. Where data is provided to our insurers in relation to the service you have requested, they may also be acting as data controllers. If you would like more information about how any of our insurers process data, you should read the privacy policy for the relevant insurer which will be available on the insurer's website.

2.Your rights – Accessing & Updating Your Personal Information

We comply with and are registered under the data protection laws in the United Kingdom and take all reasonable steps to prevent any unauthorised access to your personal data. Reasonable access to your personal information may be provided at no cost upon request made to us at the contact information provided below. If access cannot be provided within the required time frame, we will provide the requesting party a date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied.

We reserve the right to amend or modify this privacy policy at any time and any changes will be published on this website. You are entitled to see details of the information we hold about you. If any of the information held is inaccurate we will also make any necessary amendments and confirm to you that these have been made. You are also entitled to ask us to remove personal information from our records and if you wish to do this then please contact us so that we may consider your request.

To contact us about any of your rights set out in this Privacy Policy please write to the Data Protection Officer at Think Insurance Services Limited, registered in England & Wales (No.06809003), registered address at Think Insurance Services Ltd, Suite 1, 1st Floor, 26 Newhall Street, Walsall, WS1 3DZ, or email compliance@think-ins.co.uk. Please provide your full name, email address, date of birth and reference number.

3.Our Collection of your Personal Information

The information we collect may include your personal information, such as your name, contact information, IP addresses, product and service selections, address/postcode, business details and driving and conviction history. We collect personal information from you at different points, including but not limited to the following:

- When we correspond with you as a customer or prospective customer;
- When you visit our website;
- When you visit our offices;
- When you contact us requesting a quote;
- When you take out an insurance policy via us (including the administration of this policy during its lifetime);
- When you report a claim; and
- When you contact us for help.

Providing data about other people

This privacy policy sets out in detail how your data will be used by us. If you are providing us with another person's data you should ask them to also read this Privacy Policy. By giving us information about another person you are confirming that they have given you consent to provide the information to us.

4. Our Use of your Personal Information

In order to provide you with a quote we may need to collect personal data which the Data Protection Act 1998 defines as sensitive, including medical history or criminal convictions. By proceeding with obtaining a quote you will signify your explicit consent to such information being processed by ourselves and our product or service providers for the purposes stated above.

Information collected may include items such as the IP address of your computer, the date and time you visited our website and what links you clicked on or when you opened our emails. However, any information collected is kept secure and only used for the purposes set out in this Privacy and Cookie Policy.

Our Company may use information that we collect about you to:

- Deliver the products and services that you have requested;
- Set up your user account;
- Review how you use and interact with our website, to help manage and plan enhancements, and to evaluate effectiveness of our advertising;
- Manage your customer relationship and provide you with customer support;
- Perform research and analysis about your use of, or interest in, our products or services;
- Communicate with you by e-mail, postal mail, telephone and/or mobile devices about products or services that you may hold with us, may be of interest to you either from us, or other third parties;
- Verify your eligibility to credit facilities;
- Transfer personal information to third parties for any legally permissible purpose in our sole discretion;
- Administer an insurance claim;
- Enforce our terms and conditions;
- For the purposes of marketing research and data analysis to help us develop and improve the products and services that we offer.

We may use third parties to process personal information on our behalf. Where third parties process your personal information on our behalf, we will ensure that they have the necessary high standards of security in place so that your data is kept secure and only used in accordance with this Privacy Policy.

We do not sell personal information to third parties.

Driving Licence Number

If you provide your driving licence number this may be passed to the DVLA in order for a search to be carried out to confirm the licence status, entitlement and relevant restriction information and endorsement/conviction data for you or any Named Drivers. Searches may be carried out as part of your quote and at any point throughout the duration of your insurance policy. A search with the DVLA will not show on the driving licence record for you or any Named Drivers. For details relating to information held about you by the DVLA, please visit www.dvla.gov.uk. Undertaking searches using your driving licence number helps insurers check information to prevent fraud and reduce incidences of negligent misrepresentation and non-disclosure. The searches may be carried out by the insurers directly or we may carry out the search and pass the relevant information to the insurers for these purposes.

5.Communicating with you

It is very important to us that we provide a service that meets the expectations of our customers and this section will explain how we and our partners will use your data to communicate with you.

Quote Confirmation

When you request a quote from us online, you will automatically be sent confirmation of this request by SMS and/or email. We will need to call you to discuss your requirements before delivering a quote. If we are unable to make contact with you, you may automatically be sent a reminder by SMS or email to let you know we are trying to contact you about your request. Once you have spoken to an agent to obtain a quote from us, you may automatically be sent confirmation of your quote by email or SMS so that you have a record of your quote and can easily retrieve your quote in the future. This is a standard part of the service that we offer and by using the service you agree to receive these communications.

Updates from Think Insurance

Where you tell us you are happy to receive information from us we may send you communications from Think Insurance which may include the following:

- Newsletters
- Further information about the services we offer
- New product launches
- Reminders when your products may be due for renewal

Depending on the contact preferences you select, we will communicate with you by post, telephone, SMS, email or other electronic means such as via social and digital media.

If you don't want to receive communications from us you can let us know at any time by contacting us at compliance@think-ins.co.uk. You can also update your preferences at <https://www.thinkinsurance.co.uk/update-my-marketing-preferences>. Alternatively, you can update your preferences in your Think Insurance myPortal account.

Renewal Reminders

As part of our service, we may also contact you around the anniversary of when you completed your quote in order to offer you the opportunity to get an updated quote from us for the forthcoming year.

6. Our Disclosure of your Personal Information to Third Parties

We may share your personal information with third parties only in the ways that are described in this Privacy Statement:

- We may provide your information to our partner insurers and service providers who perform functions on your/our behalf.
- We may provide your information to our service providers who perform functions on our behalf. Usually our service providers sign a standard confidentiality agreement.
- We may share your data with any parent company, subsidiaries, joint ventures, other entities under a common control or third party acquirers. We would direct these other entities who will honour this Privacy Statement.
- We may allow a potential acquirer or merger partner to review our databases, although we would restrict their use and disclosure of this data during the diligence phase and direct them to treat the data confidentially;
- As required by law enforcement, government officials or other third parties pursuant to a court order, or other legal process or requirement applicable to our Company; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our agreements or Company policies: and other third parties with your consent or direction to do so.

Crime and fraud prevention

We may share data (including electronic identifiers such as IP addresses) with third parties including our product and service providers or the police and fraud prevention agencies if we believe that it is reasonably required for the prevention or detection of crime or fraud or to protect our customers. Data may also be released to third parties if we are required to do so under the terms of a court order.

7. Our Use of Cookies and Links

Our web pages use "cookies." Cookies are text files we place in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at one of our sites. However, once you choose to furnish the site with personal information, this information may be linked to the data stored in the cookie. We use cookies to understand site usage and to improve the content and offerings on our site. We also may use cookies to offer you products or services. You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage cookies, please consult the privacy features in your browser.

If cookies are already on your system, you can delete them - For more information on cookies and deletion of cookies please visit <http://www.allaboutcookies.org/manage-cookies>

Please be aware that deleting certain cookies can result in difficulties when navigating around sites.

We may create links to other web sites, we will make a reasonable effort to link only to sites that meet similar standards for maintaining each individual's right to privacy. However, many other sites that are not associated with or authorised by our company may have links leading to our site. Our company cannot control these links and we are not responsible for any content appearing on these sites. Since our website does not control the privacy policies of third parties, you are subject to the privacy practices of that third party.

We encourage you to ask questions before you disclose any personal information to others.

We are continually looking to improve your user experience and so regularly adopt and implement new technologies to help us do this. Please regularly check our cookie policy for details of the cookies we are currently using.

Session recording

We may use third-party tools to record how you interact with our website(s), including recording mouse clicks/taps, mouse movements, page scrolling and text entered into forms. This data is used by us in order for us to constantly improve our experiences.

For full details, please refer to our [Cookies Policy](#).

8.Our Security Measures to Protect your Personal Information

Our systems have security measures in place to help protect information under our control from the risk of accidental or unlawful destruction or accidental loss, alteration or unauthorised disclosure or access.

9.Our Retention of your Personal Information

We will retain any personal information only for as long as is necessary to fulfil the business purpose it was collected. We will also retain and use your personal information for as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you contact us for a quote but do not buy an insurance policy, this will be for a period of two years; If you buy an insurance product, this will be for a period of six years.

10.International Transfers of your Personal Information

Information collected from you may, on occasion be stored and processed outside the UK in any other country in which our Company or agents maintain facilities, and by accessing our sites and using our services, you consent to any such transfer of information outside of your country.

11.Changes to our Privacy Statement

This Privacy Notice is subject to change. It was last updated on 23rd May 2018. If we make changes to this Privacy Notice, we will update the date it was last changed.

12.Contacting Us

If you have any questions about this Privacy Statement, our practices or have any concerns, please contact our Compliance Officer at:

Address: Think Insurance Services Ltd, Suite 1, 26 Newhall Street, Walsall, WS1 3DZ

Email: thinkcompliance@thinkinsurance.co.uk