

## FAIR PROCESSING NOTICE

The UK General Data Protection Regulation (GDPR) establishes a set of data protection rules and sits alongside the amended version of DPA 2018. It is designed to give individuals better control over their personal data held by organisations, so we have produced this document to help you understand how we handle and process your data.

IPG Retail Limited is committed to protecting your privacy. This fair processing notice (this 'notice') sets out details of the information that we collect from you and how we may use that information. Please take time to read this notice carefully.

### HOW WE HANDLE YOUR DATA WHEN YOU HAVE A POLICY WITH US

1. **PAPA INSURANCE** is a trading name of **IPG Retail Limited**. IPG Retail Limited is authorised and regulated by Financial Conduct Authority, registration 595853.

In order for us to provide you with a quote and then insurance, and deal with any claims or complaints that might arise, we need to collect and process data about you. This makes IPG Retail Limited a 'data controller'. In this notice we use "we" or "us" or "IPG Retail Limited".

The personal information that we collect will depend on your relationship with us. We will collect different personal information depending on whether you are an IPG Retail Limited policyholder or a third party.

If personal information is provided to us in relation to third parties (for example additional policyholders/drivers) they must be made aware:

- that their data is being used for the purposes of insurance
- that they understand the contents of this notice; and
- If required- their consent is gained in accordance with this notice

In certain circumstances we will request or receive your Sensitive Personal Information and Special Category of data may take the form of your medical history and/or criminal/driving convictions.

2. IPG Retail Limited may collect the following data:

- a) general information such as your name, address, contact details, date of birth, gender and relationship to the policy holder (where you are not the policyholder)
- b) identification information such as national insurance number, passport number or driving licence number
- c) information about your job including job title, your status as a director or partner and employment status
- d) information which is relevant to your insurance details of previous insurance policies and claims history. This will depend on the type of policy you hold with us. For example, if you hold a household policy, we may collect and use information relating to your property or if you hold a Catering Van policy we may collect information concerning claims history on all related motor insurance policies

- e) information relevant to any claim or complaint you may make. This will depend on the type of claim or complaint you make. For example, if you make a claim following a road traffic accident, we may use personal information which relates to your vehicle and named drivers
- f) financial information such as your bank details, payment details and information obtained as a result of sourcing insurance. This may include details of any bankruptcy orders, individual voluntary arrangements or county court judgements
- g) information (including photographs) obtained as a result of carrying out checks of publicly available sources such as newspapers and social media sites in the event we suspect fraudulent activity
- h) information from international financial sanctions lists. This will include the checking of your information against the HM Treasury list of financial sanctions targets as well as other publicly available sanctions lists
- i) information such as IP address and browsing history obtained through our use of cookies
- j) information obtained during telephone recordings

### **3. Call recording and monitoring**

We may record, monitor and store calls, emails, SMS messages or other communications for:

- Business purposes such as quality control and training
- Purposes necessary for entering into a performance of contract
- Prevention of unauthorised use of our telecommunication systems and websites
- Ensuring effective systems operation
- Meeting any legal obligation
- Prevention or detection of crime
- The legitimate business interests of the data controller

### **4. The legal basis of processing is:**

- a) that the processing is necessary for the performance of the contract of insurance, namely the Policy, and
- b) that the processing is necessary for the purposes of the legitimate interests pursued by IPG Retail Limited, as authorised by the Financial Conduct Authority
- c) that the processing of sensitive personal data and special category of data is necessary for reasons of substantial public interest, 'if the processing is for an insurance policy'

IPG Retail Limited will use the collected data for the purposes of:

- a) Quoting and/or arranging and/or administering the insurance policy and/or credit agreement. This may appear on your credit report and will be visible to other credit providers
- b) Communicating with you in respect of any claims or complaints you wish to make
- c) Validating the insurance information provided which may result in cross-referencing the information with other insurance policies you/specified third-parties hold
- d) Ensuring compliance with international sanctions requirements

5. IPG Retail Limited may transfer your personal data for any one or more of the following purposes:
- a) Underwriting – we will pass data to our Insurance providers. The insurance providers will become joint data controllers. For more information please visit your insurers website to view their privacy policy and find out how they will use your data;
  - b) Making credit decisions – if you elect to pay your insurance by monthly instalments it will also be used to make decisions about your creditworthiness. If you are paying by monthly instalments your data will also be shared with Close Brothers Premium Finance, who we use for financial agreements;
  - c) Legitimate interests – to third parties where this is necessary or desirable for legitimate business interests of IPG Retail Limited; or as required by Law
  - d) Administration – we will transfer your personal data to third parties where this is necessary to administer the Policy and/or provide any services that are necessary relating to your insurance; and they may communicate with you in relation to the policy by letter, telephone, or email; or other communications in accordance with UK Law
  - e) IPG Retail Limited will not sell your data to third party companies. However, we may contact you from time to time with details of our other products or services which we think may interest you, unless you opt-out
  - f) No Claims Bonus – We will disclose No Claims Bonus (NCB) and claims details to your new provider should you lapse/cancel your insurance;
  - g) Authorised persons – with your express consent we can deal with another person on your behalf to help manage your insurance policy subject to answering security questions correctly. This will include the personal and sensitive data we hold.

## Details of Data Transfers Outside the UK

Information about you in our possession may be transferred to another country outside the United Kingdom to a data processing team in India for certain purposes as described within this notice.

You and they understand and accept that India may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. When we transfer information outside the United Kingdom, we will impose contractual obligations on the recipients of that data to protect such information to the standard required in the United Kingdom.

If we transfer your information outside the United Kingdom in other circumstances (for example because we have to provide such information by law), we will use best endeavours to put in place appropriate safeguards to ensure that your information remains adequately protected.

## **6. How do we protect your data?**

We use a range of organisational and technical security measures to protect your information, including:

- network security measures such as intrusion detection systems;
- access controls such as password protection and user logging; and
- virus and malware controls on our systems.

We review our security measures periodically. We also ensure that our employees receive appropriate data security training.

## **7. Profiling**

The provision of insurance is often based on profiling the likelihood of the insured event occurring. For example, we will use the information you provide in conjunction with the information provided by third party sources to assess the likelihood of a claim being made and how much it might cost and use that assessment to decide whether or not to offer you insurance and at what price.

### Insurance application

For certain policy types we use an automated underwriting engine to process the personal information you provide to us for your insurance application, together with information obtained from third party sources (such as flood risk information for home insurance policies) to determine your policy premium as well as any policy history you have with us. This information is required in order to provide you with an appropriate policy premium.

### Fraud prevention

We may use profiling to assess the probability that claims may be fraudulent or inaccurate. We use your personal information to evaluate and predict risks and outcomes. We do not make automated decisions based on these profiles.

8. IPG Retail Limited with your express consent will deal with another person on your behalf to help manage your policy, claim or complaint. Subject to answering security questions correctly, we will deal with that other person in connection with your policy. This will include the personal data and sensitive/special category data. We will continue to discuss your policy with your nominated person until you ask us not to.
9. IPG Retail Limited will update your personal data from time to time based on information received from you, your new representing Broker or any other Third Party related to your insurance.
10. IPG Retail Limited will only keep your personal information for as long as reasonably necessary to fulfil relevant purposes set out in this notice and in order to comply with our contractual, legal and regulatory obligations.

We have implemented a Record Retention Policy which records details of how long various types of information should be retained. The retention periods vary depending upon the circumstances of an individual matter, however, for a period of at least 6 years after the policy ends.

## **11. Your Rights**

Under data protection law you have certain rights in relation to the personal information that we hold about you. There will not usually be a charge for dealing with these requests. You may exercise these rights at any time by contacting our Compliance Department on 01384 245 167.

Please note:

- the rights set out below do not apply in all circumstances;
- in some cases, we may not be able to comply with your request (for example, where there is a conflict with our obligations to comply with other legal and regulatory requirements). However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.
- in some circumstances exercising some of these rights (such as the right to erasure or the right to restrict processing) will mean we are unable to continue providing you with insurance and may, therefore, result in its cancellation. You will, therefore, lose the right to bring any claim or receive any benefit, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

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.

Your information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible.

### **The right to rectification**

We take reasonable steps to ensure that 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, for example where the personal information we collected is no longer necessary for the original purpose or, where we are relying on consent as our legal ground, you withdraw your consent. However, this will need to be balanced against other factors. For example,

we may have legal and regulatory obligations which mean we cannot comply with your request.

### **The right to restriction of processing**

In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information, we hold about you may be inaccurate or where you think that we no longer need to use your personal information.

### **The right to data portability**

In certain circumstances, you have the right to ask that we transfer personal information that you have provided to 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. You can do this either by clicking on the "unsubscribe" button in any email that we send to you, or you can contact our Compliance Department on 01384 245 167. Please note that even if you opt out of receiving marketing messages, we may still send you service-related communications where necessary.

### **Rights to object**

You have a right to object to an automated decision in certain circumstances.

Where we process your personal information based on our appropriate business needs, you can object to such processing. In such cases, we will assess your objection against our business needs.

### **The right to withdraw consent**

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

Please note that for some purposes, we need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy or be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent.

### **The right to lodge a complaint with the ICO**

You have a right to complain to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations. More information can be found on the Information Commissioner's Office website: <https://ico.org.uk/>  
Making a complaint will not affect any other legal rights or remedies that you have.

## **12. Contacting Us**

If you would like further information about any of the matters in this notice or have any other questions about how we collect, store or use your personal information, you may contact our Compliance Department by telephoning 01384 245 167 or by writing to us at IPG Retail Limited, Custom House, The Waterfront, Level Street, Brierley Hill, DY5 1XH.

## **13. Updates to this notice**

From time to time we may need to make changes to this notice, for example, as the result of changes to law, technologies, or other developments. All updated versions will be immediately available on our website. This version is V1.1.

### **Our Websites and general information security**

Our Website does not enable our visitors to communicate with other visitors or post information to be accessed by others.

Any other websites that may be linked to or by our website(s) will be subject to their own policies which may differ from ours. You should carefully read the privacy policies of these websites before submitting any personal information.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask that you do not share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will collect information from you when you use our website. This information may include:

Data that allows us to remember how you use our website. This helps you by saving you from re-keying information when you return to our site. This also allows us to present our website content to you based on your interests. To enable us to do this, we use “cookies” to collect your data. Cookies are text-only strings of information that are stored on your web browser. However, you may not be able to use all interactive facilities of our site if cookies are disabled. How to disable cookies in your browser please visit the About Cookies Website.

Your IP address (this is your computer’s individual identification number for internet connection) that is automatically logged by our web server. This is used to note your interest in our website.