



Privacy and Cookie Policy

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# Our Privacy and Cookie Policy

## Contents

Introduction .....	3
A bit about us .....	3
Who we are .....	3
A few definitions .....	3
How you can contact us .....	4
Our Data Protection Officer .....	4
What information we collect and how we use it .....	4
The lawful ways we use your data .....	4
When we collect your personal data .....	5
What information we use .....	5
Sensitive personal data .....	6
Who we share your information with .....	6
Transferring data internationally .....	7
Retaining and destroying data .....	7
Automated decision-making and profiling .....	7
Obligation to provide information .....	8
Your data rights .....	8
Your right to access .....	8
Your right to rectification .....	8
Your right to erasure (the right to “be forgotten”) .....	8
Your right to restrict processing .....	9
Your right to object to direct marketing .....	9
Your right to object to automated decision-making .....	9
Your right to challenge our legitimate interests .....	9
Your right to object to the use of your information for statistical purposes .....	9
Your right to data portability .....	9
Your right to complain .....	10
Exercising your data rights .....	10
Cookie Policy .....	10
What is a cookie? .....	10
Our Cookies .....	10
Types of Cookie .....	11
Managing Cookies .....	12

## Introduction

This privacy notice tells you what you can expect us to do with personal information we hold on you, what kinds of information we hold and how we receive it. It also explains who else we may share your information with, and give you details about your data rights and how you may use them.

This privacy notice is updated from time to time, to reflect any changes in how we use and handle personal information. If we make any significant changes, we will let you know.

**This version of the privacy notice was published 26 June 2019, alongside the launch of snnug Insurance Services. There have been no previous versions.**

## A bit about us

### Who we are

We are snnug Insurance.

- snnug Insurance is a trading name of KGM Underwriting Services Limited. We are registered in England under company number 10581020. Our registered office address is 2<sup>nd</sup> Floor, St James House, 27-43 Eastern Road, Romford, Essex, RM1 3NH.
- We are regulated in the UK by the Financial Conduct Authority (FCA) under reference number 799643.
- We are also registered with the Information Commissioner's Office (ICO) under registration ZA230420.

### A few definitions

To be clear on what we mean in this privacy notice:

- **"we"** and **"us"** means KGM Underwriting Services Limited, trading as Snnug Insurance;
- **"the A-Plan Group"** means A-Plan and any company or organisation in which A-Plan holds significant share capital – you can find out more about the companies in our group by visiting [www.aplangroup.co.uk](http://www.aplangroup.co.uk);
- **"third-party"** means someone who isn't you, us or the A-Plan Group.

## How you can contact us

We take data privacy seriously and your opinion matters to us. If you have any questions about this policy or how we use your information you can contact us in the following ways:

**By e-mail:** [compliance@snnug.co.uk](mailto:compliance@snnug.co.uk)

**By post:** Compliance Department, KGM Underwriting Services Limited, 2<sup>nd</sup> Floor, St James House, 27-43 Eastern Road, Romford, Essex, RM1 3NH.

## Our Data Protection Officer

snnug's Data Protection Officer is Jonathan Cumpstey. He can be contacted in the following ways:

**By e-mail:** [compliance@snnug.co.uk](mailto:compliance@snnug.co.uk)

**By post:** marked "The Data Protection Officer", KGM Underwriting Services Limited, 2<sup>nd</sup> Floor, St James House, 27-43 Eastern Road, Romford, Essex, RM1 3NH.

## What information we collect and how we use it

We collect your information and use it in different ways depending on your relationship with us and how you have interacted with us. This can include information we share with or receive from other third parties.

## The lawful ways we use your data

We use your information for the following lawful reasons:

- **To enter into or perform a contract;** for example to provide you with an insurance quotation, to start, change or cancel an insurance policy, to manage any claims which arise, to answer any queries you may have, action your requests or perform any debt recovery.
- **To comply with a legal obligation;** for example the rules set by our regulator the Financial Conduct Authority (FCA), to fulfil your data rights under data privacy laws, and to comply with other legal requirements.
- **For our legitimate business interests;** for example to detect and prevent fraud, money laundering and other financial crimes, monitor and improve our business and our products and services, and some marketing activities. Where we rely on this lawful reason, we assess our business needs to ensure they are proportionate and do not affect your rights. In some instances, you also have the right to object to this kind of use. For more information, visit the "Your data rights" section of this notice.
- **With your consent;** for example when you ask us to provide you with information or permit us to contact you for marketing purposes. You can withdraw your consent at any time, for more information please visit the "Your data rights" section of this notice.
- **To protect vital interests:** in extreme or unusual circumstances, we may need to use your information to protect your life or the lives of others.

## When we collect your personal data

We collect personal data from you when:

- You request an insurance quotation from us, either directly or via a third-party price comparison website when they have permission to share your information with us;
- You purchase, change or cancel an insurance policy;
- We need to manage a claim made against your policy or that you bring against one of our policyholders;
- You contact us to request information or to make a complaint;
- You visit our website or the websites of other A-Plan Group companies;
- You take part in a competition, prize draw or survey;
- You have given permission to other companies to share your information;
- Your information is publicly available.

We also collect your information from other third-party sources where we have legal grounds to do so. These include anti-fraud and crime-prevention agencies, credit reference and vetting agencies, and other data providers.

We use cookies (small text files stored in your web browser) and other techniques to monitor how you use our website. For more information on what these are and how to opt out of these, please see Our Cookie Policy.

## What information we use

Depending on your relationship with us, we may hold the following types of information:

**General data:** for example, your name, date of birth, postal address, telephone number and e-mail address.

**Payment and account data:** for example, your bank account details, credit/debit card details and information about your purchases with us, including any payment plans or arrears.

**Location data:** For example, your postal or IP address, the location of any insured property, and in the event of a claim, where the collision or other incident occurred.

**Contact data:** for example, copies of correspondence we send you or you send to us, and notes or call recordings of your interactions with our call centre.

**Internet data:** for example, information collected by cookies and other online technologies as you use our website or contact us by online methods. See the "Cookies" section of this notice for more information on what we collect using cookies and other online technologies.

**Information we obtain from other sources;** including credit agencies, anti-fraud and other financial crime prevention agencies, and other data providers. This can include demographic data and interest-based data.

**Complaint data:** for example, what the complaint was, how we investigated it and how we resolved it, including any contact with the Financial Ombudsman Service or other third-party adjudicator services.

Some of our processes combine different set of information we hold. This can include combining different data sets we have about you, or combining your information with that of other individuals.

## Sensitive personal data

Some of the information we collect about you may be sensitive, for example data relating to your health and any medical conditions, or data relating to criminal convictions. We only collect this information where it is relevant to do so, such as:

- When it is relevant to the type of insurance you are enquiring about or have purchased;
- When it is relevant to a claim you have made or that someone else has made against you;
- Where it is relevant to a complaint or issue you have raised with us;
- To arrange alternate forms of correspondence for you, such as Braille, audio format or Touch-Type services;

Certain types of information are known as “special categories” under data protection law. We only use these types of data with your explicit consent, or to protect your vital interests or when it is necessary to meet a lawful purpose under the current legislation.

## Who we share your information with

Where applicable, we share your personal information with the following types of third parties when we have a valid reason to do so;

- Other companies in the A-Plan Group;
- Business partners, brokers, intermediaries, suppliers and agents involved in delivering products and services to you, including additional products purchased alongside your insurance policy;
- Price comparison websites and other similar companies who offer ways to research and apply for financial products and services;
- Credit reference, credit scoring and fraud prevention agencies;
- Debt collection agencies;
- Law enforcement, government bodies, regulatory organisations, courts and public authorities, for example the Financial Conduct Authority (FCA), The Financial Ombudsman Service, The Information Commissioner’s Office (ICO) and HMRC;
- Our insurer and, where necessary, other insurers and those acting on their behalf, for example loss adjusters, solicitors and claims experts;
- Centralised insurance databases such as the Claims and Underwriting Exchange (CUE), the Insurance Fraud Bureau (IFB) and the Motor Insurance Database (MID);

- Media agencies and other marketing organisations that we advertise with or conduct marketing activities through;
- A third party where disclosure is required to comply with legal or regulatory requirements;
- Personal representatives appointed by you to act on your behalf, or those appointed to represent a third-party claimant.

## Transferring data internationally

Data protection law places restrictions on transferring personal data outside of the European Economic Area (EEA). The EEA consists of the member countries of the European Union (EU), along with Iceland, Liechtenstein, Norway and Switzerland, and who are all considered to have appropriate data protection laws to safeguard your privacy and protect your rights.

We may need to transfer information to our service suppliers in countries outside the EEA. If we do, we will ensure that your information is properly protected. If the laws of the country where our supplier is based are not considered equivalent to those in the EU, we will ensure that the service supplier enters into a formal legal agreement that reflects the standards required.

## Retaining and destroying data

We retain information about you and the products you purchase to meet a number of legal and regulatory requirements, as well as our own legitimate business interests.

Our retention policy gives further information on the types of information we retain, how long we hold it for and why we hold it. You can request a copy by contacting us on the details shown below:

**By e-mail:** [compliance@snnug.co.uk](mailto:compliance@snnug.co.uk)

**By post:** Compliance Department, KGM Underwriting Services Limited, 2<sup>nd</sup> Floor, St James House, 27-43 Eastern Road, Romford, Essex, RM1 3NH.

For the period we retain your information, it is held securely by us or by third-party service suppliers contracted to store it on our behalf.

## Automated decision-making and profiling

We use the information you provide to build a profile of you. We use this to assess whether we are able to offer you an insurance product and to determine the specifics of an insurance policy, for example the premium you pay and the compulsory excess for any claim. Much of the use of your data is done by automation, including some of the decisions we make.

You have rights in relation to automated decision-making and profiling. See the "your data rights" section of this notice for more information.

## Obligation to provide information

Where we collect information from you in relation to insurance products and services, you are under a legal duty to answer all questions we ask fully and honestly, to the best of your knowledge. This is a requirement of the Consumer Insurance (Disclosure & Representation) Act 2013.

Failing to answer all questions asked fully and honestly may lead to a higher premium being payable, special terms or a higher excess imposed, or the policy being cancelled or voided.

## Your data rights

Data protection law gives you rights relating to your personal information. This section gives you an overview of these and how they relate to the information you give us.

The UK supervisory authority for data rights, the Information Commissioner's Office (ICO) has also published detailed information about your rights on their website: [www.ico.org.uk](http://www.ico.org.uk).

### **Your right to access**

You have a right to request copies of the personal information we hold on you, along with meaningful information on how it is used and who we share it with.

This right always applies, but there are some instances where we may not be able to provide you with all the information we hold. If this is the case, we will confirm why we are unable to provide it unless there is a valid legal reason that we cannot do so.

### **Your right to rectification**

If information we hold is inaccurate or incomplete, and this has an impact on the way we are using your data, you have the right to have any inaccuracies corrected and for any incomplete data to be completed.

If you ask us to rectify your information, we will either confirm to you that this has been done, or if there is a valid reason that this cannot be done, we will let you know why.

### **Your right to erasure (the right to "be forgotten")**

You have the right to request that your personal information is erased in certain circumstances.

If you ask us to erase your information, we will either confirm to you that this has been done, or if we are unable to delete it, let you know why and also inform you how long we will hold it for.

### **Your right to restrict processing**

You can ask us to restrict the use of your information in certain circumstances.

If you ask us to restrict your information, we will either confirm to you that this has been done, or if we are unable to restrict it, we will inform you why.

### **Your right to object to direct marketing**

You can object to receiving direct marketing from us.

If you do so, we will ensure that you do not receive such material going forward, unless you specifically request it in the future.

### **Your right to object to automated decision-making**

You can object to decisions made about you using your information and undertaken by purely automated means.

If you do so, we will arrange for someone to assess the automated decision and confirm the outcome of this assessment to you.

### **Your right to challenge our legitimate interests**

You can challenge the use of your personal data where it is used by us due to a legitimate business interest.

If you do so, we will either confirm to you that the processing has stopped, or there is a valid reason for the processing to continue, we will inform you why.

### **Your right to object to the use of your information for statistical purposes**

You can object to us using your information for statistical purposes in some instances.

If you do so, we will either confirm to you that the processing has stopped, or there is a valid reason for the processing to continue, we will inform you why.

### **Your right to data portability**

In certain circumstances, you have the right to request that your information be compiled into a common, machine readable format and either provided directly to you or sent by us to a third-party you nominate.

If you request this, we will either act upon your instruction and confirm to you that we have done so, or if there is a valid reason that this cannot be done, we will tell you why.

## Your right to complain

If you are unhappy with how we have used your data or if you believe we have failed to fulfil your data rights, you may raise a complaint with a supervisory authority responsible for data protection and privacy.

In the UK, the supervisory authority is the Information Commissioner's Office (ICO), who can be contacted using the following details:

By e-mail: [casework@ico.org.uk](mailto:casework@ico.org.uk)

By telephone: 0303 123 1113

By post: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

## Exercising your data rights

You can exercise any of your data rights by contacting us using the information shown below and telling us which right or rights you would like to exercise:

**By e-mail:** [compliance@snnug.co.uk](mailto:compliance@snnug.co.uk)

**By post:** Compliance Department, KGM Underwriting Services Limited, 2nd Floor, St James House, 27-43 Eastern Road, Romford, Essex, RM1 3NH.

## Cookie Policy

### What is a cookie?

A cookie is a small text file that is placed on your hard disk by a web page server. Cookies cannot be used to harm your computer, they cannot run programs or deliver viruses to your computer. Cookies are uniquely assigned to your computer, and can only be read by a web server in the domain that issued the cookie to you.

### Our Cookies

Our cookies don't store sensitive or personally identifiable information such as your name, address or credit card details: they simply hold a unique 'key'. We do use encrypted information gathered from them to help improve your experience of the site. For example, they help us to identify and resolve errors, or to help us work out the best user interface for our insurance process.

## Types of Cookie

Cookies can be referred to as session cookies or persistent cookies, depending on how long they are used:

- Session cookies only last for your online session and disappear from your computer or device when you close your browser.
- Persistent cookies stay on your computer or device after the browser has been closed and last for the period of time specified in the cookie. These persistent cookies may be checked each time you visit the site where the cookie was generated or, in the case of third-party cookies, from another site that also uses the same service.

Below is a list of the main cookies we use, and what we use them for.

- Essential cookies - These are cookies that are enabled for all our customers to ensure that our website works properly.
  - ASP.NET\_SessionId These cookies allows our web servers to respond to your actions on the website such as logging in or running an insurance quote. The website wouldn't work for you without them.
  - Google Analytics (any cookie beginning with \_utm) – These cookies allows us to collect anonymous information about how visitors are using our website including where they drop-off and which device/browser they came from. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.
  - Google Analytics (Demographics and Interest Reporting) – This cookie allows us to use anonymous data from Google's interest based advertising or third party audience data, including demographic information about our visitors including gender, age group and interests.
  - Visibility Statistics – We use Visibility Statistics to analyse how users interact with our website and the content found within it. Mouse movements, mouse clicks, page scrolling and text entered into search boxes and website forms may be recorded for statistical reporting purposes and to improve site usability. The data compiled is for internal use only.
  - New Relic (JSessionID) This cookie is set by New Relic ([www.newrelic.com](http://www.newrelic.com)) and is used to help us understand if our application has any errors or programming issues.
  - Other Application Cookies Visited, source\_referer,source\_refid questionSetStart, questionSetFinish. These are cookies that are set by our application. They are there so that we can understand how long our platform takes to provide you with quotes, the marketing source used to get a quote and if you have been to our site before.

## Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

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