

Privacy Notice

Introduction

Your privacy is important to us and we go to great lengths to protect it. This privacy notice tells you about the personal data we hold about you. It explains how we may collect, use and share your details and tells you about your rights under data protection laws.

If you'd like a copy of our privacy notice for your records, you can download a pdf version of the full document [here](#).

1. Who we are

We are Advantage Insurance Company Limited (referred to as 'AICL', 'we', 'us' or 'our') and our registered office is at Suite 23, Portland House, Glacis Road, Gibraltar. AICL insurance products are exclusively sold in the UK being distributed under the terms of a service agreement with Hastings Insurance Services Limited (referred to as a 'HISL').

Our Gibraltar Registration Authority registration number is DP 005252.

For the purpose of Data Protection Laws:

- 'Data controllers' are AICL and HISL. We recommend reading the privacy notice on HISL's websites or asking them how they use your information to provide you with a quote or insurance policy, their privacy notice can be found [here](#).
- 'Data subjects' are policy holders and third party claimants.
- 'Personal data' is information about an identified or identifiable natural person that could allow a living person to be identified.

2. Information we collect about you

Information we collect from your use of our website:

- Cookies. See our cookie policy for more details.

Information collected from HISL about you may include:

- Personal details such as your name (including former names), date of birth, contact details (e.g. your home address and former addresses, telephone numbers and email address), length of time you've been a UK resident, marital status and identifiers such as your driving license number and occupation.
- Sensitive personal data (special category data and criminal data), such as information about your credit history, health or criminal convictions.
- Information about your insurance requirements, such as details of your car, your home, your household, details of family and social circumstances like your marital status, driving license number or your use of the vehicle or home.
- Policy details such as the dates you joined or left (including your reason for leaving, where relevant).
- Information about your other and past policies such as your claims history, quote history, payment history and claims data.
- Credit referencing checking based upon annual fit & proper referencing checking for those individuals holding regulated positions.
- CUE on a precautionary basis.
- Premium payment method.

3. How we use your information

AICL obtains your personal data from HISL for the purposes set out below:

- To provide information to reinsurers and to manage large claims and reinsurance contracts
- To manage, test and oversee business and financial performance

Our legal reason to process your personal data is usually:

- To comply with legal requirements.
- For the performance of contractual requirements for policyholder and reinsurer contracts.
- When it's in our legitimate interest.

4. How we share your data

This section explains how your data will be shared by us. We may share your personal data we hold about you with the following third parties:

- a) Government organisations such as our regulators, the Financial Ombudsman Service, the Police, Trading Standards.
- b) Professional auditing bodies for auditing purposes.
- c) Reinsurers and reinsurance brokers.
- d) Claims underwriting exchanges, other registers, databases and intermediaries.

We may also share your personal data if the structure and make-up of AICL changes in the future. We may choose to sell, transfer or merge parts of our business or assets. We may also seek to acquire other businesses or merge with them.

During this process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private. If a change to AICL happens, then other parties may use your data in the same way as set out in this privacy notice.

Sending data outside the EEA

We may transfer personal data to, and process personal data in a country outside of the European Economic Area (**EEA**). If we do transfer your data outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA.

In most cases, this will be by using approved EU Standard Contractual Clauses. We may also process your data in countries which have reached Adequacy Decisions with the European Commission, or are part of the Privacy Shield in the US.

5. How long will we store your information?

Where you have an AICL insurance policy, we will keep your personal data for the duration of your policy and for up to seven years afterwards for the following reasons:

- To respond to any questions or complaints.
- To deal with claims against your policy.

We might keep your data for longer than seven years in the following circumstances:

- Where a claim has been settled after you stop being a customer.
- Where minors are involved in a claim.

- Where there is a claim on your policy over a set amount - we use such personal data to inform our pricing models after the claim is finally determined.

6. Your rights and how to contact us

You have the right to:

- A copy of the personal data we hold for you (please see Section 7).
- Have your data corrected if it's wrong or incomplete.
- Have your data deleted or removed if it's no longer needed.
- Restrict the processing of your personal data.
- Withdraw any permission you've given in respect of your personal data.
- Data portability - to keep and re-use your data in an electronic form for your own purposes or to ask we pass the information to another organisation.
- Get human intervention on the part of the controller, where you are subject to a decision based solely on automated processing, including profiling, which has a significant effect on you, to express your point of view and/or to contest the decision.
- Object where we're processing your information on the grounds of it being in our legitimate interests to do so.

We will uphold your rights to the best of our abilities; however, data protection laws allow us to continue to process your personal data if we have a legitimate reason to do so. For example, if we need to process data for legal requirements.

Our Compliance function is responsible for overseeing questions in relation to this privacy notice. You can contact them at:

Data Protection Coordinator

Email address: enquiries@advantage.gi

Postal address: PO Box 1429. The Old Bank 17/21 Cannon Lane Gibraltar

Please make sure to include your full name, policy and/or quote number if applicable, address and date of birth.

Hastings Insurance Services Limited

HISL has a separate privacy notice which can be found here.

You can contact the Data Protection Team for the HISL privacy notice:

Data Protection Team

Email address: dataprotection@hastingsdirect.com

Postal address: Conquest House, Collington Avenue, Bexhill-on-Sea, East Sussex TN39 3LW.

7. Subject Access Request

You have the right to obtain:

- Confirmation that your data is being processed.
- Access to your personal data.
- Other supplementary information, which is referred to in this privacy notice.

You can access your personal data we hold by writing to us at this address:

Data Protection Team

Email address: dataprotection@hastingsdirect.com

Postal address: Hastings Insurance Services Limited, Conquest House, Collington Avenue, Bexhill-on-Sea TN39 3LW

Please make sure to include your full name, policy and/or quote number if applicable, address and date of birth.

8. Complaints

If you're not happy with the way your personal data is held or processed, please tell us using the contact details above.

You can complain to the Gibraltar Regulatory Authority (GRA), Gibraltar's supervisory authority for data protection issues (<http://www.gra.gi/>).

9. Policy updates

We may update or amend this privacy notice from time to time to comply with the law or meet changing business requirements. Any changes to this policy will be posted on this page.

This version was last updated on 22nd May 2018. Historic versions are archived and you can get these by contacting us.

10. Glossary

"Data Protection Laws" means the Data Protection Act 2004, General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in Gibraltar.