Great Lakes Insurance UK Limited – Privacy Notice

This privacy notice is designed to help you, as a customer of Great Lakes Insurance UK Limited or as a person concerned in connection with the insurance or settlement of claims (for example claimant, injured party, etc.), to understand how we process your personal data.

You are a customer of Great Lakes Insurance UK Limited and we are the insurer of your policy. However, you may have purchased your insurance through an intermediary, e.g. through an insurance broker or through an intermediary that we have authorised to issue a policy on our behalf.

Alternatively, we may need your information to check if an insurance claim has occurred and how much the damage is or if you are a creditor or debtor to an insurance customer.

The insurance lifecycle respectively claims settlements may involve the sharing of your personal data with other insurance market participants, some of which, you may not have direct contact with. You can find out more information about these processors by contacting the intermediary that you purchased your policy from.

Who is responsible for processing your personal data

The Data Controller for Great Lakes Insurance UK Limited is:
Great Lakes Insurance UK Limited 1 Fen Court London EC3M 5BN Tel: +44 (0) 20 3003 7000 Fax: +44 (0) 20 3003 7010 E-mail: enquiriesGLLS@glise.com https://www.munichre.com/glise/en.html

The Data Protection Officer for Great Lakes Insurance UK Limited is:
The Data Protection Officer Great Lakes Insurance UK Limited 1 Fen Court London EC3M 5BN Email: dataprotection@glise.com

When do we collect personal data about you

We collect personal data when:

- When enquiries are submitted and we respond and we provide information about our services;
- When quotations are obtained from a broker – the broker provides us with details of the risk to be insured in order to provide a quotation;
- When we process policy documentation, financial documentation, renewal documentation, mid-term adjustments or process claims; and
- When using our website.

Who your data is shared with

The following are data controllers that we share your personal data with:

- Reinsurers – including Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München.
- Agents – that sell insurance products on our behalf.
- Brokers – that have advised our insurance products to you.
- Government Agencies.
- Legal advisers / External Consultants / Auditors.
- Motor Insurers' Bureau (MIB) and the Claims and Underwriting Exchange (CUE)

The following are data processors that we disclose your personal data to:

- Third Parties providing services for Banking, Claims Handling, Insurance Administration and IT Services.

Please contact the Data Protection Officer (dataprotection@glise.com) if you require further information on who your data is shared with.

What personal data do we collect, who is it shared with and how is it used

Personal Data

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Individual Information	Name, address, marital status, date and place of birth, nationality, employer, job title, employment history, family details and their relationship to you.	Insurance intermediaries or other insurance market participants. You and your family. Your employer.	Group companies. Reinsurers. Insurance intermediaries or other insurance market participants. Third party service providers. Anti-fraud databases. Government Agencies, Legal Advisers, External Consultants, Auditors	Setting you up as a client. Underwriting, evaluating and pricing of the risks to be insured and calculating and validating the appropriate premium for your policy.	Performance of our contract with you.
					Legitimate interest.
Policy Information	Information about the quotes and insurance policies you have applied for or taken out.	Insurance intermediaries or other insurance market participants. You and your family. Your employer.	Group companies. Reinsurers. Insurance intermediaries or other insurance market participants. Third party service providers. Anti-fraud databases. Government Agencies, Legal Advisers, External Consultants, Auditors	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you.
				Exposure management, business analysis and accounting purposes.	Legitimate interest.

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Financial Information	Premiums and claims paid on your policies. Bank account or payment card details. Income and other financial information.	Insurance intermediaries or other insurance market participants. You and your family. Your employer. Debt Collectors and their employees.	Group companies. Reinsurers. Insurance intermediaries or other insurance market participants. Third party service providers. Anti-fraud databases. Government Agencies, Legal Advisers, External Consultants, Auditors	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you.
				Exposure management, business analysis and accounting purposes.	Legitimate interest.
Statutory and anti-fraud information	Credit history, credit score, sanctions and information from anti-fraud databases concerning you.	Insurance intermediaries or other insurance market participants. Your employer. Anti-fraud databases, sanctions lists, court judgements and other government agencies, credit reference agencies.	Group companies. Reinsurers. Insurance intermediaries or other insurance market participants. Third party service providers. Anti-fraud databases. Government Agencies, Legal Advisers, External Consultants, Auditors	Setting you up as a client including checks for possible fraud, sanctions, credit and anti-money laundering.	Compliance with a legal obligation.
				Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you.

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Claim Information	Information about previous and current claims.	Insurance intermediaries or other insurance market participants. You and your family. Your employer. Anti-fraud databases, claimants, defendants, witnesses, experts inc. medical experts, loss adjustors, solicitors and claims handlers. Debt Collectors and their employees.	Group companies. Reinsurers. Insurance intermediaries or other insurance market participants. Third party service providers. Anti-fraud databases. Government Agencies, Legal Advisers, External Consultants, Auditors	Managing insurance and reinsurance claims.	Performance of our contract with you.
				Investigating or prosecuting fraud.	Compliance with a legal obligation.
				Defending or prosecuting legal claims.	Processing is necessary for the defence of legal claims.

Special Categories of Data

Categories of data	Type of information processed	Source of the data	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Individual and claim Information	Health information. Medical reports. Data about any vulnerabilities and personal circumstances.	Insurance intermediaries or other insurance market participants. You or your family. Your employer.	Group companies. Reinsurers. Insurance intermediaries or other insurance market participants. Third party service providers. Medical doctors and specialists.	Setting you up or managing you as a client. Evaluating and pricing the risks to be insured and calculating and validating any appropriate premium where there is health or life insurance.	For an insurance purpose.
				Claims administration and assessment.	Processing is necessary for the defence of legal claims.
					Consent.
				To comply with statutory regulations.	Legal obligation

Categories of data	Type of information processed	Source of the data	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Statutory and anti-fraud information	Criminal records and convictions. Surveillance reports. Data about any vulnerabilities and personal circumstances.	Insurance intermediaries or other insurance market participants. You or your family. Your employer. Anti-fraud databases, sanctions lists, court judgements and other government agencies.	Group companies. Reinsurers. Insurance intermediaries or other insurance market participants. Third party service providers Anti-fraud databases.	Setting you up or managing you as a client.	Processing is necessary for the defence of legal claims.
				Evaluating and pricing the risks to be insured and validating any appropriate premium where there is health or life insurance, including checks for potential fraud, sanctions, anti-money laundering and other statutory checks.	Processing carried out under the control of official authority.
				To comply with statutory regulations.	Legal obligation

Use of your Consent to process Special Categories of Personal Data

In order to provide insurance or to carry out claims settlements, in certain circumstances, we may need to process special categories of personal data, such as medical records or criminal conviction data.

We follow the lawful basis that your insurer has used in processing and disclosing your special categories of personal data to us. This may be for an insurance purpose or consent. If consent is used, you will not have given your consent directly to us but to the insurer that you purchased your policy from.

You may withdraw your consent for us to process your special categories of personal data at any time by contacting the Data Protection Officer (details as above). However, if you withdraw your consent this will impact on our ability to provide or continue to provide insurance for your insurance policy or pay claims.

Protecting the Privacy of Vulnerable Individuals

We recognise that some data subjects may be in situations that make them more vulnerable. We take extra care to protect your personal data. This means:

- **Clear and simple communication** – we can explain how we use personal data in plain, easy-to-understand language.
- **Respect and dignity** – we only collect what is necessary. We would never use vulnerability data in ways that could cause harm or distress.
- **Support with rights** – we provide additional help to ensure vulnerable individuals can understand and exercise their data protection rights, including the right to access, correct, or delete their personal data.

If you have concerns about how we manage your personal data, or if you need help understanding this notice, please contact us at the above address.

Motor Insurers Bureau

We work in partnership with the Motor Insurers' Bureau (MIB) and associated not-for-profit companies who provide several services on behalf of the insurance industry. At every stage of your insurance journey, the MIB will be processing your personal personal data and more details about this can be found via their website: mib.org.uk. Set out below are brief details of the sorts of activity the MIB undertake:

- Checking your driving licence number against the DVLA driver database to obtain driving licence data (including driving conviction data) to help calculate your insurance quote and prevent fraud
- Checking your 'No Claims Bonus' entitlement and claims history
- Prevent, detect and investigate fraud and other crime, including, by carrying out fraud checks
- Maintaining databases of*:*
    - Insured vehicles (Motor Insurance & Policy Data or Motor Insurance Database)
    - Vehicles which are stolen or not legally permitted on the road (Vehicle Salvage & Theft Data or MIAFTR)
    - Motor, personal injury and home claims (CUE)
    - Employers' Liability Insurance Policies (Employers' Liability Database)

- Managing insurance claims relating to untraced and uninsured drivers in the UK and abroad
- Working with law enforcement to prevent uninsured vehicles being used on the roads
- Supporting insurance claims processes

What are your rights?

Please contact the Data Protection Officer if you have questions concerning this Privacy Notice or your Data Subject Rights. These include:

- Data Subject Access Request: To request access to your personal data and information around its processing.
- Data Portability: The transfer of your personal data to another Data Controller.
- Erasure: To have your personal data removed or deleted.
- Rectification: To have your personal data corrected if it is inaccurate.
- Restrict Processing: To restrict processing where your personal data is inaccurate or the processing is unlawful.
- To object to direct marketing (we do not do direct marketing).
- To object to processing based on legitimate interest.
- The right to complain about any possible infringement of Data Protection legislation.

The Information Commissioner (ICO) advises data subjects to raise complaints regarding any possible infringement of Data Protection legislation with the Data Controller first, as this is usually the quickest way to resolve the issue. If you are dissatisfied with the Data Controller's response, you should then escalate the complaint to the data protection authority. However, data subjects also have the right to complain directly to the ICO at the outset using the contact details below:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: +44 (0) 303 123 1113

Protection of your personal data

Your privacy is important to us and we follow strict security and organisational procedures in the processing, storage, destruction and disclosure of your personal data. This is to prevent unauthorised access or loss of your personal data.

Call Monitoring and Recording

For quality control purposes and to audit the evaluation process for the underwriting and pricing of the risks to be insured, we may review copies of telephone recording made with the intermediary that you purchased your policy from.

Data Retention

We keep personal data for as long as is reasonably required for the purposes explained in this Privacy Notice. To support us in managing how long we hold your data and our record management, we maintain a data retention policy which includes clear guidelines on data retention and deletion.

Transfer of Data

We will not transfer your personal data outside the UK or EEA where there is not an adequate level of data protection.

Your personal data may be disclosed to companies within our Group or to Service Providers outside the UK or EEA. However, we ensure that there is an adequate level of data protection in place and adhered to by these parties.

You can find out the details about any other party we have shared your personal data with by contacting the Data Protection Officer at the address provided at the top of this privacy notice.

Changes to this Great Lakes Insurance UK Limited Privacy Notice

If we make changes to this privacy notice that affects how we process your personal data, we will revise the notice and publish it on our website.