PRIVACY POLICY

INTRODUCTION

Octagon Insurance Company Limited has created this privacy policy to communicate our commitment to maintaining the privacy of information provided to us by clients. We understand the nature of the information entrusted to us and acknowledge that maintenance of the privacy of such information is of the highest importance to our clients. The following describes our information gathering and dissemination practices for www.octagoninsurance.com.

WHEN DO WE COLLECT PERSONAL INFORMATION?

We collect personal information directly from you when you register for any online service or deal with us over the telephone, such as when you make a request for a quote, when you purchase an insurance policy through us or when we provide policy administration or claims handling services. In addition we may collect personal information if you make use of our live chat service. We limit the collection of personal information to what we need to know to maintain the accuracy of our records, to verify the identity and assess the financial standing of customers, to assist us in providing a high standard of service, and to fulfil any legal and regulatory requirements. We will do our best to ensure that your details are accurate and kept up-to-date and we would ask you to assist us in doing so by notifying us of any changes to your personal information.

WHAT INFORMATION DO WE HOLD?

When clients take out a policy, we hold personal data about them. This includes:

- Your name and address for correspondence
- Your date of birth
- Details of any previous claims and driving convictions
- Medical histories that are reportable to the DVLA
- Your occupation

We will use the information we hold to administer your policy, process your claims and to detect and prevent fraud as appropriate. We may give out information to third parties as necessary to administer your policy and to help detect and prevent fraud or improper claims. Before providing personal information about others who may be insured you must have first gained their consent.

WHAT DO WE USE YOUR PERSONAL INFORMATION FOR?

We may collect, use and disclose the following categories of information as follows:

- In relation to our online quotation service, to provide you with one or more online quotations;
- To consider your application for, and facilitate your purchase of, an insurance policy through
• To provide you with other services, including managing and administering the insurance policies you take out through us, and providing assistance with your claims and enquiries;
• To offer you the opportunity to renew a policy or purchase a replacement policy;
• To update our records about you;
• For the investigation of or prevention of crime;
• To undertake credit searches;
• To enable us to conduct research and statistical analysis and facilitate our internal customer service monitoring;
• To improve the quality of our service and the efficiency of our website and systems.

Insurers and their agents may share information with each other, via the Claims and Underwriting Exchange Register operated by Insurance Database Services Ltd, to prevent fraudulent claims and to assess whether to offer insurance (including privacy terms). Lists of participants are available on request. In dealing with your quotation, this register may be searched. In the event of a claim, the information you have supplied and the claim form together with other information relating to the claim, will be put on the register and made available to participants.

Your policy details will be added to the Motor Insurance Database (MID), run by the Motor Insurers Information Centre (MIIC). MID data may be used by the DVLA and DVANI for the purpose of Electronic Vehicle Licensing and by the Police for the purposes of establishing whether a driver’s use of their vehicle is likely to be covered by a motor insurance policy and/or for preventing and detecting crime. If you are involved in an accident (in the UK or abroad), other UK Insurers, the Motor Insurers Bureau and MIIC may search the MID to obtain relevant policy information. Persons pursuing a claim in respect of a road traffic accident (including citizens of other countries) may also obtain relevant information which is held on the MID. You can find out more about this from us, or at www.miic.org.uk.

USE OF YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES

From time to time, we may wish to contact you with offers or information relating to products and services of ours and of carefully selected third parties which we think may interest you. We may also contact you to invite you to take part in customer research.

If you would prefer not to receive marketing communications from us and have not previously advised us of this, please contact us on 0844 561 4615 or e-mail customerservices@octagoninsurance.com.

DUTY OF DISCLOSURE

We will provide you with a quotation based on the information you provide to us. It is essential that all information and answers you give are true and accurate as undisclosed information could invalidate any insurance subsequently arranged. This could lead to claims not being met. If you are in any doubt as to the relevance or accuracy of the information you provide, you must discuss this with one of our operators.
YOUR PERMISSION

When you provide us with your data it may be necessary for us to transfer it to associated companies in order to provide you with the information and quotations requested. We may also use this information to inform you about other products and services which we feel may be appropriate for you. By providing us with your personal data you are agreeing to us using it in this way. However, we will take steps to ensure that your privacy rights are respected.

LOGIN/IDENTIFICATION PASSWORDS

Parts of our service may require users to provide us with login identification and a password, which will be used to verify your identity and for our internal use in maintaining your customer account. Security warning: In such instances you will be provided with a password in order to protect your personal information. You must keep this password safe and must not disclose it to anyone. You will need your password to retrieve your personal information. Please inform us as soon as possible if you think that someone else knows your password or if you think that someone else is trying to access your details. We do not accept any responsibility or liability if a third party obtains or guesses your password and uses it.

OUR USE OF COOKIES

Cookies are small files created by websites to identify users. Cookies may be used by linked sites to manage each user interaction to ensure proper identification of the user. If you choose to, you can set your web browser to reject cookies from our service. However, rejecting cookies from our service may prevent your use of our service.

When you browse the website and do not make use of any of our online services we do not collect or process any personal information of yours. However we use cookies to record certain non-personalised data (such as the number of visitors to certain areas of the website), which we compile for statistical purposes to help us develop and enhance the website and our online services. You cannot be individually identified from this cookie-derived data.

SERVICE ACTIVITY LOGGING

Our application has the capability to monitor your actions while using our service. We use this information to understand the use of our services, to diagnose problems and enhance the features and functionality of our service.

EXCEPTIONS

Except as described above, we will not otherwise use or disclose any personally identifiable client information, except to the extent reasonably necessary:

• To correct technical problems and to process technically your information
• To protect the security and integrity of the website and our service
• To protect our rights and property and the rights and property of others
• To take precautions against liability
• To respond to claims that your information violates the rights or interests of third parties
• To the extent required by law or to respond to judicial process or
• To the extent permitted under other provisions of law, to provide information to law enforce-
  ment agencies or for an investigation on a matter related to public safety, as applicable.

SECURITY

Our website uses firewall technology as a standard Internet security measure to prevent the loss, misuse and alteration of the information under our control. Our web servers are located in a high security and high availability co-location facility professionally managed by a third party. The servers that we store personally identifiable information on are kept in a secure environment. This website takes every precaution to protect our users’ information. When users submit sensitive information via the website, your information is protected both online and offline. We do everything in our power to protect user-information offline. Only employees who need the information to perform a specific task are granted access to personally identifiable information.

AMENDMENTS TO PRIVACY POLICY

Please note that we keep the content of this Privacy Policy under review and that, from time to time, we may amend or update the content without informing you in advance. The website will always display the current version of the Privacy Policy.

By using, or continuing to use, the website, or otherwise requesting that we provide you with services, you acknowledge that you accept any such amendments or updates and so we recom-

mend that you review this Privacy Policy regularly. No amendments or updates to this Privacy Policy will affect your right to choose not to give consent to your personal information being used for our, and/or third parties’, marketing purposes, as set out above.

GOVERNING LAW AND JURISDICTION

Policies shall be interpreted under, governed by and construed in accordance with the laws of England and Wales.

DATA PROTECTION

Octagon Insurance Company Limited and Octagon Insurance Services Limited are registered with the Gibraltar Regulatory Authority Data Protection Division as a data processor and con-

roller. We adhere to the principles of the Gibraltar Data Protection Act 2004 and will use any available data solely for the purpose intended. One Quote Direct Limited is licensed by the UK Data Protection Commissioner as a data processor and controller.

You also have the right to request a copy of all the personal information we hold about you. To do this, simply write to us at the following address enclosing a cheque for £10.00 payable to Octagon Insurance Company Limited to cover our administrative costs in dealing with your request:
Data Protection Officer
Octagon Insurance Company Limited
Suite 945, Europort
Gibraltar

We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

CONTACT INFORMATION

If you have any questions about this privacy policy or the practices of this website please contact:

The Chief Executive Officer
Octagon Insurance Company Limited
Suite 945, Europort
Gibraltar

Email: chiefexecutive@octagon.gi

Octagon Insurance Company Limited and Octagon Insurance Services Limited are registered in Gibraltar, Company Numbers 102260 & 106445. Registered Office: 945 Europort, Gibraltar. They are regulated by the Gibraltar Financial Services Commission, and subject to limited regulation by the Financial Conduct Authority (FCA) in the UK.