

# Customer Privacy Notice



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## Who we are

Collingwood Insurance Services (UK) Limited (CISL) is an insurance intermediary offering insurance products from a number of insurance providers and is authorised and regulated by the Financial Conduct Authority (FCA), registration No. 310870. CISL are also registered with the Information Commissioners Office (ICO), the registration number is Z7099126.

CISL are registered in England & Wales, registration No. 4174235 with the registered address being Collingwood Insurance Services (UK) Ltd, Collingwood House, Redburn Court, Earl Grey Way, North Shields, NE29 6AR.

## What personal information we collect

CISL will collect the personally identifiable information from yourself listed below:

- your full name
- your date of birth
- your address
- your home, work and/or mobile telephone number
- your email address
- your driving licence number
- driving Convictions
- criminal Convictions

# Who we will collect personal information from

We will only collect personal information from customers who proceed to make a quote or to take out a policy, this includes the policyholder, any named drivers or any nominated person to assist with the management of the policy on the policyholder's behalf.

# Why we collect personal information

CISL will collect personal information from the policyholder, any named drivers or any nominated persons, in order to provide products and services that meet the policyholder's needs. This will be in the form of providing an insurance quote, and if agreed upon, an insurance policy along with any add-ons that the policyholder has taken out with us. In addition, personal data may be collected by CISL and shared with the insurer for the purpose of claims management.

# How we will collect personal information

Policyholder, named drivers and nominated persons, personal information will be collected by one of the following methods; online via the CISL suite of websites, by post, email, text, or multimedia media message, through social media, over the telephone or face to face. Personal information will be collected once the CISL insurance quote has been started. We will collect it by asking a series of questions, related to the products and services we are offering or providing. We require the answers to these questions to be factually correct and accurate.

# Legal basis for processing

In order to provide our services and to ensure the contract of insurance is administered correctly, we will collect and use personal data about you and anyone you provide personal data for. The legal basis for processing this data is obtained on a contract basis, is for the performance of an insurance contract between the policyholder and their insurer.

We also collect other data from to enable us as the insurance intermediary to provide our services; these include the policyholder and/or nominated persons mobile telephone number, email address, payment information including debit/credit card details and/or bank account number and sort code. We have a legitimate interest to collect this information in order to provide our services including administering the policyholder's online account.

We have legitimate interest to record telephone calls to meet our regulatory obligations to retain evidence of transactions, combat financial crime, provide the best level of customer service and to assist with complaints.

# Consent

CISL are committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience. This privacy notice applies to all CISL websites and governs our data collection and usage. When we require specific personal data from yourself, we will make it clear at that point what the data is we require, what the purpose is for collection and how CISL will use it.

Upon first visiting our website you will be given the option to consent to opt in to the various optional cookies used on our website. You also have the option available to remove consent for specific cookies at any time.

When purchasing a policy, you will also be given the option to consent to opt in to marketing from both CISL and third party partners. These are optional and do not need to be accepted in order to take out a policy.

## Withdrawing consent

If after you give consent for CISL to process your personal data and you change your mind, under Data Protection legislation you have the right to withdraw your consent at any point.

To do this you will need to send an email to CISL at the following email address:

compliance@collingwood.co.uk or by selecting unsubscribe on emails that you received from us relating to our products and services (marketing emails).

To remove consent to specific cookies, these can be changed by updating your preferences using the **Change Cookie Preferences** link which can be located in the footer of our website

[www.collingwood.co.uk](http://www.collingwood.co.uk)

## Individual rights

You have the following rights as an individual which you can exercise in relation to the personal information we hold about you:

- the right to be informed of what we use your personal data for
- the right for you to request copies of personal data held about you<sup>1</sup>
- the right for us to rectify any errors identified with your personal data
- the right to have your data deleted or removed<sup>2</sup>
- the right to block or restrict our processing of your personal data
- the right to data portability to move, copy or transfer personal data from one IT environment to another in a safe and secure way
- the right to object to us processing your personal data or for direct marketing; and

- the right to lodge a complaint with CISL if you feel we are not handling your personal data appropriately<sup>3</sup>
- the right to withdraw consent at any time

Further information regarding your rights can be found at;

<https://ico.org.uk/fororganisations/guide-to-thegeneral-data-protection-regulation-gdpr/individualrights/>

## Social media

CISLs Social Media<sup>4</sup> accounts are managed internally. If you send a private or direct message via social media the message will be stored for seven years. Your messages will not be shared with

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<sup>1</sup> Via a Data Subject Access Request notice terms of business agreement.

<sup>3</sup> CISLs internal complaints procedure is detailed within your

<sup>2</sup> Can only be performed in certain circumstances in line with UK GDPR

<sup>4</sup> Facebook, X (Formerly Twitter), TikTok and Instagram

any other third party. Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through CISL public message boards, this information may be collected and used by others<sup>1</sup>. For further information regarding the security of your data within Social Media platforms please review their associated privacy policies.

## Information sharing

CISL may share your personal information with carefully selected partners to support the processing and administration of your policy. We may also share your personal data with selected partners to provide a range of services, products and benefits to your policy. In addition, CISL may share data with partners to help it perform statistical analysis, or provide customer support. All such partners are required to maintain the confidentiality of your information. These partners are detailed below:

- Aggregators (online price comparison sites)
- Close Brothers for arranging credit to be repaid by direct debit
- A panel of insurers for Insurance Cover
- Coplus for insurance policy add-ons
- Click4Assistance who provide our Live Chat facilities
- Hamilton Internet Services Limited for processing MOT reminders on our behalf

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<sup>1</sup> CISL does not read any of your private online communications

- Motor Insurance Database (MID) and Motor Insurance Bureau (MIB) to confirm whether you have an insurance policy with CISL and to validate your No Claims Bonus
- MyLicence for validating your Driving Licence type and any conviction data
- Adswizz for monitoring some of our marketing campaigns
- Thingco who monitor our telematics devices. Click [here](#) for ThingCo's Privacy Policy
- Winn Solicitors for administration of the legal cover provided as part of the policy

## Security of your personal information.

CISL secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. When personal information (such as a credit card number) is transmitted to other web sites, it is protected through the use of encryption, such as Secure Sockets Layer (SSL) protocol.

## Information retention.

CISL have a regulatory obligation to retain records of transactions for a period of seven years. This is to ensure we are able to service your policy for its lifecycle and to support on the resolution of any claims that may occur during, or after, the policies duration. CISL retain personal data via computer secure servers and paper documentation storage.

## Visitors to our websites.

When you visit a CISL website a third-party service, Google Analytics<sup>2</sup>, is used to collect standard internet log information and details of visitor behaviour patterns. CISL do this to keep track of the web sites and pages our customers visit within CISL, in order to determine which services are the most popular. This data is only collected with opt in consent from the user and is used to deliver customised content and advertising within CISL to customers whose behaviour indicates that they are interested in a particular subject area. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

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<sup>2</sup> Google analytics utilise \_utma, \_utmb, \_utmc and \_utmz cookies for this purpose.

# Use of cookies.

Details of the cookies we use can be found in our cookie banner. This can be accessed by clicking on the link to change cookie preferences at the bottom of every page. The preferences allow you to choose which categories of cookies you consent to us using. The cookies below are necessary to be added in order to ensure our website preforms correctly.

Cookie Name	Duration	Description
__RequestVerificationToken	Session	The __RequestVerificationToken cookie is used to validate the data input in a form on our website. This token value is used to verify that the form submission has come from our site, and that our site security is not being circumvented. This cookie is necessary for correct operation of our site.

cookieyesID	1 year	CookieYes sets this cookie as a unique identifier for visitors according to their consent.
cky-consent	1 year	The cookie is set by CookieYes to remember the users's consent settings so that the website recognizes the users the next time they visit.
cookieyes-necessary	1 year	CookieYes sets this cookie to remember the consent of users for the use of cookies in the 'Necessary' category.
cookieyes-functional	1 year	CookieYes sets this cookie to remember the consent of users for the use of cookies in the 'Analytics' category.
cookieyes-analytics	1 year	CookieYes sets this cookie to remember the consent of users for the use of cookies in the 'Analytics' category.
cookieyes-performance	1 year	CookieYes sets this cookie to remember the consent of users for the use of cookies in the 'Performance' category.

cookieyes-advertisement	1 year	CookieYes sets this cookie to remember the consent of users for the use of cookies in the 'Advertisement' category.
cookieyes-other	1 year	CookieYes sets this cookie to remember the consent of users for the use of cookies in the 'Other' category.
cky-action	1 year	This cookie is set by CookieYes and is used to remember the action taken by the user.
ASP.NET_SessionId	Session	Issued by Microsoft's ASP.NET Application, this cookie stores session data during a user's website visit.
JSESSIONID	Session	The JSESSIONID cookie is used by New Relic to store a session identifier so that New Relic can monitor session counts for an application.
PHPSESSID	Session	This cookie is native to PHP applications. The cookie stores and identifies a user's unique session ID to manage user sessions on the
		website. The cookie is a session cookie and will be deleted when all the browser windows are closed.
wpEmojiSettingsSupports	Session	WordPress sets this cookie when a user interacts with emojis on a WordPress site. It helps determine if the user's browser can display emojis properly.

## People who use our live chat service.

CISL use a third party provider Click4Assistance to supply and support our Live Chat services, which we use to handle customer enquiries in real time. If you use the Live Chat service we will collect your name, email address, Policy Reference (optional) and the contents of your Live Chat session. This information will be retained for a minimum of seven years and will not be shared with any other organisations, with the exception of the Live Chat suppliers. You can request a transcript of your Live Chat session by contacting CISL at [webmaster@collingwood.co.uk](mailto:webmaster@collingwood.co.uk). This correspondence must be addressed to the Head of Risk and Compliance. For further information regarding the privacy notice relating to Live Chat, please visit <http://www.click4assistance.co.uk/privacynotice.aspx>



## Emailing us.

We will monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. If your email service does not support a form of encryption, for example it does not support TLS<sup>3</sup>, you should be aware that any emails we send or receive may not be protected in transit.

## Disclosure of your personal information.

CISL will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on CISL or its sites; (b) protect and defend the rights or property of CISL and, (c) act under exigent circumstances to protect the personal safety of users of CISL, or the public.

## SMS Marketing.

We will not share your SMS opt-in status or mobile number with any third party for purposes unrelated to Collingwood products. We may share your Personal Data, including your SMS opt-in status, with third parties that help us provide our messaging services, including but not limited to platform providers, phone companies, and any other vendors who assist us in the delivery of text messages.

## Information retention.

CISL have a regulatory obligation to retain transaction records for a period of seven years. This is to ensure we are able to service your policy for its lifecycle and to support on the resolution of any claims that may occur during, or after, the policies duration. CISL retain personal data via computer secure servers and paper documentation storage.

## Links to other websites.

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on any other website you may visit.

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<sup>3</sup> Transport Layer Security

# Changes to this privacy notice.

CISL will occasionally update this privacy notice to reflect company and customer feedback. CISL encourages you to periodically review this privacy notice to be informed of how it is protecting your information. It will be reviewed on an annual basis as a minimum; however it may be reviewed more often due to changes in regulation and feedback received. The last review and update was in June 2024.

# Contacting CISL.

If you have queries surrounding this privacy notice, concerns or questions regarding the use of your data or our adherence to this privacy notice, please contact CISL at:

[compliance@collingwood.co.uk](mailto:compliance@collingwood.co.uk)

This correspondence must be addressed to the Head of Risk and Compliance.