



## **Privacy Statement**

### **Welcome to the Integrity Group privacy notice.**

Integrity Claims Management respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Integrity Claims Management includes the following legal entities who may provide specific services to you:

Integrity Claims Management Ltd, Integrity Claims, ICM, Integrity, IntegrityCM – accident management and fleet management services (including the supply of temporary replacement vehicles);

Please note that certain terms in this privacy notice are defined at the end of this notice under Definitions.

Before moving on to the content of our privacy policy, please see below a transcript of the recording that our customers hear during their initial call with us:

#### **Initial Call Recorded Message Transcript - Non-Fault Credit Services Customers**

Welcome to Integrity Claims please be aware that all of our calls are recorded. In order to divert your call accordingly, please choose from the following options,

Press 1 for claims, 2 for transport and vehicle inspections, 3 for accounts, 4 for payment pack enquiries, 5 for sales and new business enquiries or 6 for anything else.

### **1. Important information and who we are**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how ICM collects and processes your personal data.

Neither our website nor any of our services are intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements any other notices and is not intended to override them.

#### **Controller**

Integrity Claims Management Ltd is the controller and responsible for your personal data in respect of the services they provided to you.

This privacy notice is issued on behalf of the Integrity Group so when we refer to "ICM", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Integrity Group

responsible for processing your data. We will let you know which entity is the controller for your data when you conclude any transaction with us.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Company Secretary using the details set out below.

### **Contact details**

Full name of legal entity: **Integrity Claims Management Ltd**

For the attention of: **Russell Ryan**

Email address: **russell@integritycm.co.uk**

Postal address: **22 Montague Road, Leytonstone, London, E11 3EX**

You have the right to make a request at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, we would appreciate the opportunity to deal with your concerns prior to any approach to the ICO in the first instance.

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

At some point, our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, driving licence status (including road traffic convictions) and data relating to proof of identity.
- **Contact Data** includes residential address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about any agreements you sign with us and other details of products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password and any feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity.

With the exception of information relating to road traffic offences (required for motor insurance purposes) either disclosed by you or obtained following a DVLA search against your driver's licence and details of any claim for any injury suffered in a road traffic accident, we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions or trade union membership).

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including

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- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Contact us or are contacted by us in relation to our products or services;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google, who may be based outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Experian, Barclaycard, Europcar, DVLA etc.
- Contact and Transaction Data from parties that are involved in your motor accident claim. For example, the party that referred your claim to us.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver our services including:  (a) Manage payments, fees and charges  (b) Collect and recover money	(a) Identity (b) Contact  (c) Financial (d) Transaction  (e) Marketing and	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)

owed to us	Communications	
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and</p>	<p>(a) Identity</p>	<p>Necessary for our legitimate interests (to</p>

recommendations to you about goods or services that may be of interest to you	(b) Contact (c) Technical (d) Usage (e) Profile	develop our products/services and grow our business)
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## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### **Promotional offers from us**

We may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Opting out**

You can ask us (or third parties on our behalf) to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or by at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of services we have provided, warranty registration, product/service experience or other transactions.

## **Cookies**

A Cookie is a text file that is placed on your computer by a website that you visit. They are used to make websites work, or work more efficiently, as well as to provide information to the owners or operators of the website.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Our website makes use of cookies to monitor visitor sessions. No personal information is stored in the cookie that is issued by the site. The value stored in the cookie is an anonymous identifier, which is not linked to any other personal information you may give us during your visit. If you do not wish to receive these cookies you can disable them in your browser but this may affect the functionality of our website.

Most web browser settings allow some control of cookies. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Parties involved in the administration of your claim. These include vehicle repairers, engineers, insurers, vehicle suppliers, legal advisers, claims investigators and, if applicable, the party that referred your claim to us.
- If your repair is funded by a third party on a credit basis (currently DWA, Proximo, Magna Hire, S&G Response) we will disclose Identity and Contact Data to them or such third party to enable them to offer you repair funding services. We may also disclose Identity and Contact Data to a third party sub-contractor to carry out customer satisfaction surveys on our behalf. You are able to opt out of any of your data being processed for this purpose at any time.
- Internal Third Parties as set out in the Definitions.
- External Third Parties as set out in the Definitions.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties

who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For details of retention periods for different aspects of your personal data, please contact us.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers. We adopt a long-stop period of ten years.

In some circumstances you can ask us to delete your data: see “Request erasure” below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact the Company Secretary at Integrity Claims Management Ltd, 22 Montague Road, Leytonstone, London, E11 3EX.



### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we reserve the right to charge a reasonable fee if your request is clearly unfounded, repetitive, excessive or malicious . Alternatively, we may refuse to comply with your request in these circumstances

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Definitions**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **Internal Third Parties**

Other companies in the Integrity Group (acting as processors) and who are based in the UK and provide certain services in relation to the services we provide and the administration of your claim.

#### **External Third Parties**

- Service providers acting as processors who provide IT and system infrastructure and administration services.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide their respective services to us.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who may require reporting of processing activities in certain circumstances.
- Organisations involved in the prevention and detection of insurance fraud.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

