

## Who we are

Brightside Insurance Services Ltd is an independent insurance broker, which is authorised and regulated by the Financial Conduct Authority. Our registered office is located at Brightside Park, Severn Bridge, Aust, Bristol, BS35 4BL.

## Introduction

Brightside is committed to respecting your privacy and protecting the personal information that you share with us. You can be assured any information you provide to us will be used strictly in accordance with the terms laid out in this policy and complies with Data Protection laws.

This privacy policy explains how we collect and use your details, the laws and regulations that apply, the systems and services we use and how we detect and prevent crime such as fraudulent applications and claims.

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 letting us know of any changes to your personal information. Keeping us up to date with changes to your information is also a requirement of many insurance contracts.

You should show this policy to anyone whose personal information you provide to us. You must ensure that any such information you supply relating to anyone else is accurate and that you have obtained their consent to the use of their data for the purposes set out above.

If you do not pay for your insurance, you must show these details to the person who paid on your behalf.

## Data Protection Laws

Data protection laws means the Data Protection Act 1998, as amended from time to time and EU General Data Protection Regulation (GDPR), and any subsequent, similar or equivalent legislation relating to the protection of personal, including sensitive data.

Please see [www.ico.org.uk](http://www.ico.org.uk) for our entry in the Information Commissioner's register of data controllers. Our registration number is Z5268008.

Please note that under the Rehabilitation of Offenders Act 1974 you're not required to disclose to us any convictions regarded as spent. Take a look at [here](#) for more information

It is also an offence under the Road Traffic Act to make any false statements or to withhold information for the purpose of obtaining a Certificate of Motor Insurance.

## Our commitment to you

We will treat all your personal information as private and confidential. Other than under the terms of this privacy policy we will not share any of your information with anyone else. We are required to disclose information in the following cases by law. These are:

- Where we are legally forced to
- Where there is a duty to the public to disclose information
- Where you have given permission to disclose information
- Where we have to protect our interest, including but not restricted to legal advice in the event of litigation.

## Information We Collect

It's important that you provide complete, accurate and up to date information prior to purchasing, throughout the lifetime and when you renew an insurance policy. If you don't, your policy may be cancelled, or treated as if it never existed, or your claim rejected or reduced.

We collect information about you when:

- You visit our websites
- You call us to obtain a quote and buy insurance
- You make changes, cancel or renew your insurance policy

We limit the collection of personal information to what we need to know to maintain the accuracy of our records, verify the identity and assess the financial standing of customers, assess and arrange credit, handle claims, deal with complaints, re-engage with you if we lose contact, assist us in providing a high standard of service, and to fulfil any legal and regulatory requirements.

We may collect, use, store and transfer different personal information about you which we have grouped together below:

- **Identity Data** includes [first name, last name, username or similar identifier, marital status, title, date of birth and gender].
- **Contact Data** includes [address, email address and telephone numbers].
- **Financial Data** includes [bank account and payment card details].
- **Transaction Data** includes [details about payments to and from you and other details of products and services you have purchased from us].
- **Technical Data** includes [internet protocol (IP) address, your login data, 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 this website, further information is provided within our Cookie Section].
- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, 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].
- **Claims Data** includes [Date of Claim, Claim Status, Value of Claim, NCB affected]

We may also collect data which the Data Protection Act defines as sensitive, such as;

- **Medical history** includes [Medical Condition, Medications]
- **Criminal convictions** includes [the offence committed, the date of conviction].

We will not use data regarded as sensitive data except for the specific purpose of arranging and administering an insurance policy.

## How we use your information

All personal information is treated confidentially and is safely stored, with security systems preventing unauthorised access.

In order to assess, arrange and administer an insurance contract, provide you with the best prices and reduce fraud, we collect and share information from a variety of sources and methods as detailed within this policy. If we are unable to have your consent for this or you subsequently withdraw your consent, then we may not be able to offer you insurance products or credit.

Why we need your personal data	Our legal grounds for processing	Why we selected these legal grounds
In order to assess, arrange and administer an insurance policy	Legitimate interest to provide a quote and insurance policy	Without processing your personal data in this manner, Brightside will be unable to provide a quote or an insurance policy to you.
Communication with you about the quote, purchased policy, customer service queries and complaints	Legitimate interest to provide a quote and insurance policy	On occasion Brightside may need to contact you regarding your policy and to resolve customer queries or complaints. As our customers sometimes need time to consider a quote, we will follow up with a courtesy call prior to the quote expiry.
To complete Market research and analysis	Legitimate interest to provide a quote and insurance policy	This research allows Brightside to improve our service, our products, and provide you with the best price.
To complete credit referencing	Legitimate interest to provide a quote and insurance policy	This allows Brightside to confirm your ability to pay by instalments.
For the collection of monies owed to Brightside	Legitimate interest to provide a quote and insurance policy	To recover any debts owed to Brightside.
To prevent fraud	Legitimate interest to provide a quote and insurance policy	To prevent, detect and investigate fraud. Without this ability we are unable to provide an insurance policy to you.
To renew your policy automatically	Legitimate interest to provide a quote and insurance policy	To ensure you remain insured, we will automatically renew your policy when due. Before we do this, we'll write to you, and if you're happy with your price and cover, you won't need to take any action. If you have any questions, don't hesitate to contact us, and you can opt out of automatic renewal at any time.
Information management purposes	Legitimate interest to provide a quote and insurance policy	To allow Brightside to manage business operations such as accounting records and internal/external audits.
To contact you about our products and offers (marketing)	Consent	We're always looking to offer our customers great products at great prices - but we need your permission to do it. If you change your mind you can tell us at any time.
To contact you about partners' products and offers (third party marketing)	Consent	We work with great partners who can give you special offers and discounts. If you change your mind you can tell us at any time.
Setting up a continuous payment authority	Consent	We'd like to be able to automatically collect payments from the existing payment details we have for you. This means you will benefit from the fact that we will be able to quickly and simply refund any outstanding money to your account and take payment for any chargeable adjustments you make to your policy or collect any outstanding balances to ensure you aren't

		left without insurance. Don't worry, we won't take any money without telling you first.
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## Sharing your information

As we are an insurance broker we will collect and process your personal information and share it with insurers or providers of services. To provide you with a wide range of products and services we work closely with many insurers and services.

When we use these providers for your insurance and finance needs, we will endeavour to ensure that we have their agreement to collect and process your data on terms equivalent to those in this privacy policy and to use the information we provide only for the purpose(s) we provide it to them for.

Examples of who we need to share your data with are:

- Our insurance or price comparison partners
- Independent contractors we engage from time to time to ensure we meet and exceed industry standards
- The Financial Ombudsman Service and our regulators such as the Financial Conduct Authority, the Information Commissioners Office.
- Central Government
- Credit reference agencies
- Credit providers
- Debt collection agencies
- Market research and survey agencies
- Motor insurance, claims and underwriting databases
- Anti-Fraud, theft and vehicle registers and agencies
- Data destruction companies
- Legal representatives
- Complaint Handling agencies
- Law enforcement agencies, and prosecuting authorities including the Police, Courts and Tribunals
- Other third parties where you have provided us permission to do so, such as a family member

If the products we offer require us to transfer your personal data to an insurer outside of the European Economic Area, we will impose contractual obligations to protect your personal data to the same standard required in the European Economic Area. We will also endeavour to choose insurers that subscribe to 'international frameworks' intended to enable secure data sharing between countries.

A full list of insurers we work with can be found [here](#).

## How we get information

When you visit our websites, technical information about the device and operating system used to access the site is recorded. Further detail regarding this technical information is explained in our Cookie section. We use this information to give us a better understanding of how you use and interact with our websites.

This information is stored and used for aggregated and statistical reporting and informs changes on how to improve your experience with us.

To provide you with best experience we may also use publically accessible sources such as the DVLA and postcode lookups to help populate some of the forms needed in the application process.

We also analyse the data we collect within quotes and applications to inform automated decision making, detect trends, including market research and profiling for the detection of fraud, determining pricing and credit options.

## Cookies

We use cookies to be able to distinguish you from other users of our sites. We use a number of different cookies to make the websites work and remember the choices you make.

Cookies are small, often encrypted text files placed on your computer by our websites or sometimes by emails. They are used by our web developers and digital team to provide us with useful information so you can use our site more efficiently and save you time by not having to re-enter your details each time you visit. They also make sure you receive the most relevant information from us.

Persistent cookies - These cookies stay on your computer until they are removed manually or automatically.

Session cookies - These cookies remain on your computer until you close your browser, when they are automatically deleted.

Essential cookies are technical cookies that are required for the operation of our sites. Without essential cookies our web site can't operate properly. Essential cookies include, for example, cookies that enable you to log into secure areas.

Performance cookies allow us to recognise and count the number of visitors to our web site and to see how visitors move around our pages. This helps us to improve the way our web site works by enabling us to tailor our site to the way visitors use them. The information we collect from performance cookies is aggregated which means that we cannot identify you from it.

Due to their core role of enhancing/enabling usability or site processes, disabling cookies may prevent you from getting the most out of our sites. You can refuse cookies by activating the relevant setting on your browser. However, if you do so you may not be able to access all or parts of our sites. If you carry on using our sites and do not change your browser settings we will assume you consent to us using cookies as described above.

## Credit searching and references

Our insurers and credit providers need to have the necessary facts to assess your insurance risk, verify your identity, to help prevent fraud and to provide you with their best premium and payment options. Credit searching, scoring and referencing are methods that insurers and credit providers use to verify your information. By applying for a quotation, you agree to these uses of your information.

Public and personal data from a variety of sources, including a credit reference agency and other organisations are used at quotation and renewal and in certain circumstances where policy amendments are requested. The credit referencing agencies record our enquiries, which will leave a record of the search on your credit report. Prospective lenders looking at your credit report will see for 12 months that you applied for credit and whether you were accepted.

Where automatic credit scoring computations are used, acceptance or rejection of your application will not depend the credit scoring process alone.

## Anti-fraud registers

When dealing with your request for insurance, anti-fraud registers may be searched. We use a number of anti-fraud methods both at and after application including SIRA, a comprehensive fraud prevention and detection solution from [Synectics Solutions](#). We will also pass details to the Claims and Underwriting Exchange Register and the Motor Insurance Anti-Fraud and Theft Register, to check the information provided and prevent fraudulent claims. [MIB](#) is the data controller for the Claims and Underwriting Exchange (CUE) and Motor Insurance Anti-Fraud Theft Register (MIAFTR) databases.

Under the conditions of your policy, you must inform the insurer of any incident (such as an accident or a theft) which may, or may not, give rise to a claim. When you inform us of an incident, we'll pass the information relating to it to the registers.

If we identify a discrepancy on the aforementioned registers which does not correspond to the information you have provided, we will apply the correct information to your policy and process this change as a mid-term adjustment. Where applicable, an additional premium will be charged by your insurer. If the correct information is unacceptable to your insurer, cover may be cancelled or voided (which means to treat as if the policy never existed).

We may detect and prevent fraudulent claims and/or activities by undertaking searches against your (or any person included on the proposal) Drivers Licence Number (DLN) against details held by the DVLA to confirm your licence status, entitlement and restriction information and endorsement/ conviction data. This helps insurer's check information to prevent fraud and reduce incidences of negligent misrepresentation and non-disclosure. A search of the DLN with the DVLA should not show a footprint against your (or another relevant person included on the proposal) driving licence.

## Information security

How we protect your personal information from misuse and abuse is of great importance to us. We regularly review our technical and physical security procedures to protect your personal data from unauthorised access.

The Brightside website uses secure socket layer (SSL) encryption technology to encrypt sensitive information such as your financial information. When you request a quote from us, we will process the data on a secure server.

## Payment Security

When you purchase a policy, with your consent, your card and bank account details will be stored, safely in accordance with industry standards.

If you do not want your credit/debit card being used for this purpose you may contact our customer services team at any time to make alternative payment arrangements.

## Motor Insurance Database (MID)

Information relating to your motor insurance policy will be added to the Motor Insurance Database ("MID") managed by the Motor Insurers Bureau ("MIB"). MID and the data stored on it may be used by certain statutory and/or authorised bodies including the Police, the DVLA, the DVA, the Insurance Fraud Bureau and other bodies permitted by law for purposes not limited to but including:

- i) Electronic Licensing
- ii) Continuous Insurance Enforcement
- iii) Law enforcement (prevention, detection, apprehension and/or prosecution of offenders)
- iv) The provision of government services and/or services aimed at reducing the level and incidence of uninsured driving.

If you are involved in a road traffic incident (either in the UK, the EEA or certain other territories), insurers and/or the MIB may search the MID to obtain relevant information.

Persons (including his or her appointed representatives) pursuing a claim in respect of a road traffic incident (including citizens of other countries) may also obtain relevant information which is held on the MID.

It is vital that the MID holds your correct registration number. If it is incorrectly shown on the MID you are at risk of having your vehicle seized by the Police. You can check that your correct registration number details are shown on the MID [here](#).

## Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the

website in question. Please be advised that we do not represent either the third party or you, if you enter into a transaction on the third party site.

## Contact and consent

We gather several consents from you throughout your quote. You choose the consents you give. So that you know what these are, we've listed them below;

- We're always looking to offer our customers great products at great prices. We'll only do this when we have your consent.
- We work with great partners who can give you special offers and discounts. We'll only do this when we have your consent.
- Our intention is to renew your policy automatically, meaning you can enjoy another 12 months of insurance without having to lift a finger. We'll write to you in good time before the end of your policy to confirm this and we'll use your existing payment details to collect any payments.
- We'd like to be able to automatically collect payments from the existing payment details we have for you. This means you will benefit from the fact that we will be able to quickly and simply refund any outstanding money to your account and take payment for any chargeable adjustments you make to your policy or collect any outstanding balances to ensure you aren't left without insurance. Don't worry, we won't take any money without telling you first.

You can change these consents at any time. Simply contact us by phone, post or email. You can find our contact page [here](#).

## How long do we keep your information?

Any information we hold about you, whether on our computer system or on paper files, will be treated as private and confidential. We only keep your information as long as we need to, and in any circumstances, no longer than 50 years.

## Your individual rights

Brightside always considers the rights of the individual concerned, when processing personal data. Below is a list of your specific rights in relation to data protection. Where these rights are exercised, we will either do what you have asked, or explain why we can't. Usually because of a legal requirement or regulatory issue.

### **Right of Access:**

You have the right to access personal information held about you by Brightside Insurance Services Ltd. More details on how to exercise this right can be found below in the section 'How to access your information' below.

### **Right to Object:**

Object to processing of your personal data, in particular for the use of direct or indirect marketing.

### **Right to Rectification:**

Brightside take steps to ensure the personal information we collect is accurate and complete. Where you believe this is not the case you can ask for inaccurate or incomplete personal data held about you rectified. Access and processing of this personal data will be restricted until it is changed.

### **Right to Erasure:**

Ask for personal data about you erased when it is no longer needed for the purposes it has been held, or when required to do so by law. Brightside have processes and policies in place, such as our retention policy, to ensure we only hold data in use, or required for legal or regulatory purposes.

### **Right to Restriction:**

Ask to restrict the processing of your personal data, for example where you believe your information may be incorrect, or where you no longer wish for your information to be processed.

**Right to Data Portability:**

Obtain and transfer your personal data across different providers. You will find this information readily available within your policy documents.

**Right not to be subject to automated decision making:**

Brightside complete automated-decisions to ensure you are provided with the correct premium, to prevent fraud, and administer your policy. You have the right not to be subject to these automated decisions, however without these automated decisions we are unable to provide you with a quote or policy.

## How to access your information

Under the Data Protection laws you have the right to access personal information held about you by Brightside Insurance Services Ltd.

If you would like a copy of the personal information we hold about you, or if you have any questions or queries in respect of confidentiality, data protection or a need to change or delete information please contact Brightside.

You should also contact us if you have concerns about the information we hold on you or how we have handled it.

To contact Brightside about any of the above you can either email: [subjectaccessrequests@Brightsidegroup.co.uk](mailto:subjectaccessrequests@Brightsidegroup.co.uk) with SAR in the subject, or write to, **SAR, Brightside Park, Severn Bridge, Aust, Bristol, BS35 4BL**. We will take reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

If you still have any concerns about how we have handled your information or for more information on the Data Protection Act you can visit the Information Commissioner's Office website [here](#) or call them on 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

You can also email: [casework@ico.org.uk](mailto:casework@ico.org.uk) (please include your telephone number) or write to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## Copyright

Access to our website ('Site') and our rights in it:

We are the owner of all copyright, design rights, database rights and all other intellectual property rights in the content of this Site unless otherwise stated.

You are permitted to access and use this site for personal, non-commercial use only. You may not access or use this site for any commercial purposes or otherwise exploit, extract, publish, distribute, or reproduce any part of this site for any commercial purpose.

We will take very seriously any access to or interference with this site with intent to deny, corrupt or damage or otherwise interfere with service from the Site or for other commercial purposes. We will monitor any such use and will take whatever action necessary to protect against such activities. By using this site, you agree that damages may not be an adequate remedy for any breach of these terms or infringement of any of our rights by you and you accordingly agree that we are entitled to any and all of the following remedies: injunction; specific performance; orders to deliver up infringing copies or materials and any other legal or equitable relief for any threatened or actual breach and/or infringement. You further agree that no proof of special damages is necessary for us to obtain any such remedies.



## Governing Law

This Privacy Policy is governed by the laws of England and Wales and subject to the exclusive jurisdiction of the English Courts.

## Appendix 1: Panel of Insurers

Abacus  
Accelerate Underwriting Limited  
Advance Insurance Services  
Ageas Insurance  
Agent Assure  
AIG UK Limited  
Allianz Insurance  
Angel Assistance  
Ansuar Insurance  
Antilo Uk Ltd  
APC Underwriting  
Apex Insurance Services  
Aqueduct  
Arc Legal  
Arista Insurance  
Arthur J Gallagher  
Aviva  
AXA  
Beazley  
Beech Underwriting Agencies  
Bollington Insurance  
Bond Insurance Services Ltd  
Brit Insurance  
Broker Direct  
Business & Domestic Insurance Services  
Camberford Law Plc  
Canopius  
Canopius Underwriting Ltd  
Capricorn  
Capricorn Underwriting Services  
Carroll & Partners Ltd  
Cass-Stephens Insurances Ltd  
CCV Underwriting Sport & Leisure  
Century Underwriting Ltd  
Chartis Insurance UK Limited  
Cherished Car Underwriting Agency  
Chubb  
Clearbroking  
Clegg Gifford & Co  
Click 2 Insure  
Collingwood Insurance  
Columbus Direct  
Commercial Express  
Commercial Express Quotes Ltd  
Compare the Market

Compucar Insurance Services  
Confused  
Congregational & General  
Covea Insurance  
Darwin Clayton  
DAS  
Dashwood Brewer & Phipps Ltd  
Deacon  
Direct Fleet Insurance Services  
Direct Group Insurance Limited  
E & L Insurance  
Eaton Gate  
Ecclesiastical  
ECIC  
Ensign  
Eridge Underwriting  
ERS  
Euna Underwriting Limited  
Evolution Underwriting Ltd  
Fastnet Marine Insurance Services Ltd  
Foreman Bassett  
Foster Leighton & Co Ltd  
Fusion Insurance Services Ltd  
Gallagher Heath  
General & Medical  
Giles Insurance Brokers  
GoCompare  
Graham Sykes Ltd  
Granite  
Gresham Innovative Insurance  
GRS Group Ltd  
Harvington  
Haven Knox-Johnston  
Hayward Aviation Ltd  
Heath Lambert  
Highway Insurance  
Higos Underwriting Services  
Hiscox Underwriting Ltd  
Holgate Insurance Brokers Ltd  
Holmans  
Home & Legacy  
Howden Insurance Brokers  
HSB Engineering Insurance Ltd  
IGI Insurance Group  
IGI Legal Assist - AmTrust Europe Ltd  
Incorporated Insurance Group Ltd  
Infinity Agency Ltd  
Infinity Specialist  
Ingham & Co  
INK Underwriting  
Insureit UK Ltd

Intana  
Integra Insurance Solutions  
Inter Partner Assistance  
J & M Insurance Services UK Ltd  
Jardine Lloyd Thompson  
JCB Insurance Services Ltd  
Jardine Lloyd Thompson  
John Beard & Son Ltd  
Keelan Westall  
KGM Underwriting Services Limited  
Kitsune Associates Limited  
Legal & General  
Leisure Insure  
LFC Insurance Group  
Lockton Companies LLP Limited  
Lorega Ltd  
LV Insurance  
Marchant McKechnie  
Markel UK Ltd  
Markerstudy  
Marsh Ltd  
MBP Insurance  
Midas  
Miles Smith  
Norwich Union  
Modus Underwriting Ltd  
Money SuperMarket  
Moorhouse X Broker  
Motorplus Ltd  
Mynton Insurance Services  
Navigators & General  
Newline Insurance Company  
Nice 1 Ltd  
NIG  
Noble Marine  
Octane Insurance  
Omnibus  
Orbit Underwriting Agencies Ltd  
Organisation of Horsebox & Trailer Owner  
Orion Direct  
Paragon Car Ltd  
Paragon Fortress  
Park Home Insurance Services Ltd  
Pen U/W Ltd  
Pen Underwriting  
Plum Underwriting  
Policyfast  
Policyplan  
PowerPlace  
Premier Line  
Premier Underwriting

Premium Credit Ltd  
Prestige Underwriting Services Ltd  
Prosure Solutions Ltd  
Protegys Network Ltd  
Pukka Insure  
QBE Insurance  
Quotezone  
R&B Underwriting  
RAC  
RDG Commercial  
Rentguard Ltd  
Riverstone Insurance Ltd  
Royal & Sun Alliance  
RUP Commercial Risks LLP  
Rural Insurance Group Limited  
Ryan Direct Group  
Sabre Insurance  
Safeonline LLP  
Sagicor life @ Lloyds  
Sagicor Underwriting Ltd  
Senior Wright Ltd  
Simply Thatch  
South Essex Insurance Brokers Ltd  
Spectrum Leisure  
Spectrum Motor Breakdown  
Sutton Specialist Risks Ltd  
T H March Insurance Broker  
Tansar  
Tasker Partners  
Taxi Fleet Plus  
TFP Schemes  
THB  
Thistle Insurance Services Ltd  
Towergate  
Tradex Insurance Company Limited  
ULR  
Uninsured Loss Recovery  
uSwitch  
Van Compare  
Vast Visibility  
Victor Millwell  
W.R Berkley  
Walsingham Underwriting  
Wrightsure Services Ltd  
Xbroker  
XS Direct Insurance Brokers Ltd  
Zenith Insurance Plc  
Zenith Services UK Ltd  
Zurich Personal Lines  
Zurich Solutions