



Privacy Notice

In accordance with the General Data Protection Regulation and related UK data protection legislation, we are committed to protecting the confidentiality and security of the information that you provide to us.

This Privacy Notice is designed to help you understand how we collect and use your information.

Under Article 14 of UK GDPR, we must advise you where we have obtained your data from a third party, for example a recruitment agency or former employer (via a reference). Before obtaining your data, we will take all reasonable steps to ensure that the party providing your data to us, has a lawful basis for doing so. Details of the third party who provide us with your data are available on request. Should you have any queries in respect of their data protection practices, you should contact them directly.

This Privacy Notice is designed to help you understand how we use information about you that we obtain via a third party, in addition to information that you provide us with directly.

If you have any questions, queries or require any further information, please do not hesitate to get in touch with us. Our full contact details are below.

If you have any questions or queries about this policy, please contact us.

Overview Of This Privacy Notice

Section	What It Tells You
Your Right To Be Informed	Our obligations to you in respect of the fair and transparent processing of your data.
Who We Are	Our details as the Data Controller.
How To Contact Us	Our full contact details.
Data We Hold	Explains what types of personal data we collect from you.
Special Category Data (SCD)	SCD is treated differently to personal data under GDPR, this section explains what SCD is and how we process it.
What We Do With Your Data	We may process your data in different ways, this section explains how we will use the data you provide.
Lawful Basis For Processing	Under the GDPR, we are required to have a lawful basis for processing your data. We may have more than one lawful basis so this section explains which bases may be used.
Marketing	This section contains information about how we will market to you and our lawful basis for doing so.
Sharing Your Information	It may be necessary for us to share your personal information, for us to provide our services to you. This section explains if we share your data, and who with.
Transfer of Personal Data Outside the UK	It may be necessary to transfer your personal data outside the UK. This section explains what happens when this is the case.
How Long We Retain Data	The retention period for the data we hold will depend on the type of data and how it has been processed. In all cases, we will not retain data for longer than is necessary. This section outlines our retention periods.



Your Data Protection Rights	The GDPR enshrines the rights of the data subject into law. This section outlines what rights you have as a data subject.
How To Make A Complaint	If you are unhappy with the way in which we process your data, please refer to this section as it outlines how you can make a complaint.
Cookies	Our website uses cookies. This means that certain data is collected by us, about you, when you visit our website. This section provides you with more information on cookies and the data collected.



Who We Are

"Paragon Car Limited" (also referred to in this Notice as "we", "us", or "our") and our trading names of Thamesbank Insurance Services, Myinsurer.co.uk, Paragon Household Homeinsurer.co.uk, Tradeinsurer.co.uk, Quoteyourhome.co.uk, Driveinsurance.co.uk, and Quoteyourmotor.com. means Paragon Car Limited.



How to contact us

For any questions or concerns relating to this Privacy Notice or our data protection practices, or to make a subject access or any other request regarding the information we hold, please contact us at:

Paragon Car Limited
Jupiter House
Green Street Green Road
Dartford
Kent
DA1 1QG
Tel: 0344 2740162
Email: admin@paragon-uk.net
Website: www.paragon-uk.net



Why we need & how we use your personal data

We only collect, use and store your information where we have lawful grounds and legitimate business reasons to do so.

We collect, use and store your personal information in order to:

- fulfil requests for quotes
- submit your application to any insurer on our panel of insurers, to enable them to provide you with a quotation, or multiple quotations as applicable
- provide products and services as part our insurance broking
- to assess your financial standing
- claims handling and risk management
- arranging premium credit facilities
- verify your identity
- administer and maintain your policies
- administer your payments
- invite the renewal of your policy
- to prevent fraud
- to enable us to carry out anti-money laundering and other financial crime checks where required



- carry out market research, statistical analysis and customer profiling;
- to facilitate our quality and compliance monitoring.

We may also share your information with law enforcement bodies, reinsurers and regulators such as the FCA, as required or permitted by law. In addition, in the event of a merger, acquisition, or any form of sale of some or all of our assets, to a third party, we may also disclose your personal information to the third parties concerned or their professional advisors.

The use of your data is essential for us to check your identity, to enable you to enter into an insurance contract and for the insurance to operate (in the event of a claim, for example). We may also use it keep our records up to date, to notify you about changes to our service and to help us in developing new products and services.

If you do not provide the information required, we are unlikely to be able to arrange your insurance and may not be able to provide certain services to you.

We may monitor calls, emails, text messages and other communications with you. When you contact us, we may keep a record of that correspondence and any information provided to us during that or any subsequent communication.



Credit Reference Checks

Soft Search

Our insurers will conduct credit reference checks at one or more of the UK's credit reference agencies ("CRAs") in certain circumstances. In all cases these checks will be carried out to confirm identity, help prevent fraud and calculate premiums. This is a soft search **which is only visible to you** (if you request a copy of your credit file at the credit reference agencies) and is not visible to other organisations. This type of credit reference check will not affect your credit file. The search will be visible on your credit report, but it won't affect your credit rating as it's not an application for credit. The CRAs may add the details of our insurers' searches and information that we and our insurers hold about you to their records relating to you.

Hard Search

We use third party premium finance providers to enable you to pay your insurance premium by instalments. In order to verify your identity, and confirm your credit status, the third party providers (Close Bothers Premium Finance Limited) will conduct a credit check, known as a 'hard search'. This will be visible on your credit file, whether or not your application with them proceeds, and will appear in credit searches undertaken by other organisations.

In addition to the credit check undertaken when you first take a policy with us, if you opt to pay by instalments, a credit check will be undertaken **automatically** as part of the automatic renewal process we operate, full details of which are contained in our Terms of Business. You can opt-out of the automatic renewal process and credit check by contacting us at any time, but in all cases **no later than 45 days prior to your renewal date**.



Nature of personal data

Personal data is any information that may identify a living individual. We collect personal information such as name, contact details, date of birth, gender, marital status, financial details, employment details and other personal details, depending on the nature of the insurance and other services we offer, when you or your

representative obtains a quote, incepts, renews or amends a policy or makes a claim.

This information may consist of the following personal information:

- your name, contact details (including home address, telephone number and e-mail address) and date of birth;
- all other personal information that is provided to us when completing an application for a quote for any policy, including (as necessary) any sensitive information (e.g. information about your health and/or previous convictions or policy voidances etc.);
- details of all previous quotes for policies requested from us;
- details of all policies held with us including dates of purchase, lapse and cancellation;
- details of claims on policies held with us;
- your payment history relating to policies held with us; and
- the length of time you have been a customer with us.

This information may be shared with insurers, insurance product providers and our third party service providers. Where necessary, we shall obtain your consent to the processing of such information.



Information from other sources

We may collect information from you about other people, for example, family members who may be included on a travel or household insurance policy. If you give us information about another person it is your responsibility to ensure and confirm that:

- you have told the individual who we are and how we use personal information, as set out in this Privacy Notice
- you have permission from the individual to provide that personal information to us and for us to use it, as set out in this Privacy Notice.

We may use legal public sources such as the electoral roll and other third-party sources such as credit reference agencies to obtain information about you, for example to verify your identity or check your credit history.

We also obtain information about you from credit reference agencies and similar third parties. Some personal information may be provided to us by third parties such as insurance companies, other insurance intermediaries and motor vehicle licensing authorities. In some cases you will have previously submitted your personal information to them and given them approval to pass this information on for certain purposes.

Such information will only be obtained from reputable sources which operate in accordance with the General Data Protection Regulation.

We and/or other parties may use your information for purposes such as statistical and trend research and analysis which may include computerised processes which profile you. Automatic profiling helps us understand, predict and forecast customer preferences and to improve the products and services we offer and to assess which products might be most suitable for you.



Lawful Basis For Processing

It is a requirement of the UK General Data Protection Regulations that data is processed only when there is a lawful basis for doing so.

Our legal basis for processing data will include one or more of the following:

- the processing of data is necessary for the performance of a contract to which you are a party or when taking steps in order to enter into a contract at your request
- processing is necessary for our compliance with our legal obligations
- processing is necessary for the purposes of pursuing our legitimate interest (including carrying out our business of providing insurance services to clients and prospective clients and pursuing our general business interest)
- the processing is necessary for the establishment, exercise or defense of legal claims
- for the purposes of marketing, we may process your data on the basis of consent



Sharing information

We will only supply your personal information to other parties where such a transfer is a necessary part of the activities that we undertake, where you give us consent or where we are required to do so by law or regulation (e.g. where the disclosure is necessary for the purposes of the prevention and/or detection of crime).

As an intermediary we must disclose personal information to insurance companies, underwriting agencies, business partners and other parties in order to provide our products and services and to enable you to enter into insurance contracts.

Examples of other parties include other insurance intermediaries, loss adjusters, regulatory bodies, legal and accountancy firms involved in the claims handling process. We may also share your personal information with fraud prevention agencies such as the Claims and Underwriting Exchange Register and Motor Insurance Anti-Fraud and Theft Register.

We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents and suppliers.

We may also disclose your information to service providers engaged to perform services on our behalf. Such service providers are contractually restricted from using or disclosing the information we give them except as necessary to perform services on our behalf or to comply with legal requirements.

We only share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

We may also disclose personal information to new owners of our business in the event that we are subject to a merger or acquisition. Disclosure may also be made to enable company audits, regulatory inspections or to investigate a complaint, suspicion of fraud or a security threat.

We never share your information outside our organisation for marketing purposes.

You understand that we may disclose the information you provide to relevant other parties for the purposes described in this Notice.



Transfer of personal data outside the UK

Certain personal information held on our Information Technology systems may be transferred across geographical borders in accordance with applicable law.

These transfers are governed by UK International Data Transfer Agreement (“IDTA”) to protect the security and confidentiality of personal information.



How long we keep information about you

We will keep your information for as long as it is required to enable us to provide quotations, administer your insurances, offer renewal and respond to any claims or complaints (which may arise after the period of insurance has expired).

Information for quotations that do not result in the purchase of a policy is not retained by us. Where you purchase a policy with us, the data will usually be held for the duration of your policy, plus six years or otherwise, as determined by law or regulation. Once we decide that we no longer need your information, it will be securely and confidentially destroyed.



Marketing

We would like to keep you updated about our relevant products and services by email, SMS and/or telephone. Where you have obtained a quotation from us, or have a policy with us, our lawful basis for sending marketing information will be Legitimate Interest. Where we have no previous relationship with you, we will obtain your consent before contacting you for marketing purposes. Any consent you provide can be withdrawn at any time.

If you have already consented and wish us to stop using your information for this purpose or any other purpose then please contact us.

We will not share your data with Third Parties for marketing purposes without first obtaining your explicit consent.



Your data protection rights

The data protection regulations and UK law seeks to protect your rights as follows:

- **The right to be informed.** Individuals have the right to be told what personal data is collected about them, why, who is collecting the data, how long it will be held, how they can file a complaint and with whom your data will be shared.
- **The right of access.** Individuals have the right to access the personal information and organisation holds about them. To request a copy of this information you must make a subject access request by contacting us using the contact details above.
- **The right of rectification.** Individuals may ask an organisation to correct any inaccurate or incomplete data within one month.
- **The right to erasure.** Individuals have the right to have your personal data erased and to prevent processing except where we have a legal obligation to process your personal information. You should bear in mind that by exercising this right you may hinder or prevent our ability to provide products and services.
- **Right to restrict processing.** Individuals can request that an organisation limits the way it uses their personal data. This means that an organisation is not obligated to delete the data, but they



have to refrain from processing it.

- **The right to data portability.** On your request, we will provide you with your personal data in a structured format.
- **The right to object.** Allows individuals to object to the processing of personal data at any time, in certain situations and will depend on the purpose of processing and the lawful basis for processing.
- **Rights in relation to automated decision making and profiling.** You have particular rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for profiling, direct marketing or research purposes.

If you wish to invoke any of these rights, please write to us at:

Paragon Car Limited

Jupiter House

Green Street Green Road

Dartford

Kent

DA1 1QG

Tel: 0344 2740162

Email: admin@paragon-uk.net

Website: www.paragon-uk.net

Withdrawal of consent

Where you have provided your specific consent to the use of personal data, you may withdraw that consent by contacting us:

Paragon Car Limited

Jupiter House

Green Street Green Road

Dartford

Kent

DA1 1QG

Tel: 0344 2740162

Email: admin@paragon-uk.net

Website: www.paragon-uk.net



Cookies

Cookies are small files downloaded to your computer or other devices when you view or access certain websites.

In general, a Cookie will use your IP address to identify you but will not collect further information about your identity. If you would like more information about cookies, please visit www.allaboutcookies.org

Cookies enable us to distinguish you from other users of our website and help us to provide you with a good experience when you browse our website and allows us to improve our website. We use Cookies for the purposes of:

- understanding what brought you to our website and what pages you visited
- remembering you when you return to our website
- providing you with safe restricted access areas



If you wish to change or manage Cookies, this can be done by changing your browser settings to delete or block cookies.

However, if you chose to block all Cookies, this may result in you being unable to fully access and enjoy our website.



How to make a complaint

If you wish to make a complaint about how we hold or use your data, please contact us:

Paragon Car Limited
Jupiter House
Green Street Green Road
Dartford
Kent
DA1 1QG
Tel: 0344 2740162
Email: admin@paragon-uk.net
Website: www.paragon-uk.net

If you are dissatisfied with how we deal with your complaint, you may contact the Information Commissioner's Office:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Phone: 08456 306060
Website: www.ico.gov.uk

We may amend this Privacy Notice from time to time for example, to keep it up to date or to comply with legal requirements. The latest version of this policy can be found at www.paragon-uk.net