# 1. Introduction

S&G response is a service provider for the UK motor insurance market. We typically manage motor claims or specific services relating to motor claims following a motor incident. Services that we cover include, but are not limited to: full motor claims management, vehicle repair, property repair, vehicle hire, vehicle recovery and vehicle engineering services.

S&G Response takes data protection seriously and is committed to respecting and protecting your personal data. We aim to be as transparent as possible about what we do with your information, as such this privacy notice explains how we will collect, store and use any personal data available to us and also details your rights with regards to your personal data.

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.

Please take the time to read this privacy notice and contact us on the details below should you have any questions.

# 2. Contact details

**Telephone:**

01625 417 758

**Post:**

Risk and Compliance Dept,

S&G Response,

St Ann’s House,

Parsonage Green,

Wilmslow,

Cheshire,

SK9 1HG.

**Email:**

SARS@sandgresponse.co.uk

# 3. The data we may collect about you

**Personal Data**

We may collect or be provided with personal data as part of providing claims management services to our clients, we may also use this data to help prevent crime, prosecute, or defend against legal action.

The personal data we obtain and process typically includes:

* Name, address and contact details (e.g. telephone number and email address)
* Date of birth
* Employment data (e.g. your employment status and job title)
* Vehicle information (e.g. your vehicle registration, registered keeper details and VIN number)
* Identification documents (e.g. driving license)
* Health data (e.g. disabilities that may affect selection of hire vehicle or vehicle repairer)
* Criminal conviction data (e.g. motoring offences that may affect hire vehicle insurance cover)
* Vulnerability data (information about health, life events, resilience and capability that helps us identify if you might have additional support requirements in order that we can better meet your needs)
* Website usage information (e.g. IP address, user journeys and cookie tracking)
* Information relating to compliments or complaints
* Photograph, Video and CCTV recordings relating to a claim
* Dashcam footage (both internal and external, with and without audio)
* Call recordings
* Evidence provided by witnesses to an incident or claim
* Any other personal data we collect (such as the customer reference numbers which may be assigned to you) during the process of providing our services or in the course of operating our business.

**Children’s Data**

In some instances, we may collect data about children e.g. where a child (policy holder or named driver under the age of 18) has submitted a motor claim which we are managing on their behalf.

**Sensitive Data**

Sometimes we will obtain or be provided with personal information that is sensitive in nature. Under data protection regulation this can include information relating to your health, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership.

Given the nature of this type of data we will only obtain and use this where absolutely necessary. The types of special category data that we may obtain and process include:

* Health data – This includes details of existing and previous physical or mental health conditions. This may be used to provide additional support where required e.g. provision of suitable hire vehicles, correct selection of vehicle repair sites or amendments to standard communication types or processes.
* Criminal data – such as licence endorsements or fixed penalties for motoring offences. This may be used when arranging courtesy cars or hire vehicles due to the effect on subsequent insurance cover for such vehicles.

# 4. Where we get personal information from

We may receive your personal information from the following sources:

* Directly from you
* From your insurance company, broker, agent or fleet managers
* From other representatives or third parties who provide you services e.g. roadside assistance providers or manufacturer accident assistance providers
* From business partners who provide us with services relevant to your claim e.g. vehicle repair centres, roadside recovery agents, hire providers, engineering services, experts and legal advisors.
* From third parties involved in your claim e.g. third party insurance companies, claimants, defendants and witnesses to an incident.
* Our regulators including the Financial Conduct Authority (FCA), Information Commissioner’s Office (ICO), and the Financial Ombudsman Service (FOS)
* Government agencies and regulatory bodies including the police, courts, the Driver and Vehicle Licensing Agency (DVLA), Companies House and HM Revenue & Customs (HMRC)
* Publicly available sources such as internet searches, news articles, and social media sites e.g. Instagram, Facebook, X (formerly Twitter)
* Insurance industry bodies such as the Motor Insurers Bureau (MIB).

# 5. How we use your information

We may use your information for the following purposes:

* To investigate and assess claims or potential claims
* To undertake checks for the purpose of detecting, investigating and preventing fraud, money laundering and other crime
* To verify your identity
* To process, manage and settle motor claims through business partners, suppliers and third parties
* To communicate and manage customer relationships
* To help identify customers who have additional needs and may require additional support
* To analyse and improve our customer experience and supporting business processes through auditing, surveys and customer feedback channels
* To manage complaints, queries and requests
* To determine what is most effective about our website, and to help identify ways to improve it, and to tailor it to be more effective
* To comply with a professional, legal or regulatory obligation which may apply to us
* As we consider necessary to prevent illegal activity or to protect our interests.
* Where it is necessary for our legitimate interests, and your interests and fundamental rights do not override those interests.
* To complete our contractual obligations to you.

# 6. Legal grounds for processing your information

Data protection legislation dictates that to use your personal data as set out in this privacy notice we must have a ‘lawful basis’ to do so. Depending on the purpose, our lawful basis for processing will be one of the following:

* Performance of, or entry into, a contract.
* Compliance with a legal obligation to which we are subject.
* Where we have a legitimate interest in doing so as a services provider.
* In certain circumstances, where we have express consent to do so.

We may process client’s personal data as a both a Data Processor and a Joint Data Controller in accordance with the terms of the contractual arrangements in place between us and our business partners.

# 7. Sharing your information

We may share your details with third parties for the purposes set out above. We will only share your personal data in compliance with Data Protection Legislation.

We may disclose your information to the following:

* Your insurance company, broker, agent or fleet manager/provider
* Representatives or third parties who provide you services e.g. roadside assistance providers and manufacturer accident assistance providers
* Business partners who provide us with services relevant to your claim e.g. vehicle repair centres, roadside recovery agents, hire providers, engineering services, experts and legal advisors.
* Third parties involved in your claim e.g. third party insurance companies, engineers, investigators or solicitors
* Service providers, such as banks, Information Security and IT systems providers
* Our regulators, including the Financial Conduct Authority (FCA), Information Commissioner’s Office (ICO), and the Financial Ombudsman Service (FOS)
* Government agencies and regulatory bodies including the police, courts, the Driver and Vehicle Licensing Agency (DVLA), Companies House and HM Revenue & Customs (HMRC)
* Insurance industry bodies such as the Motor Insurers Bureau (MIB).
* Third parties who detect, prevent and investigate crime, fraud and money laundering

We will not sell your information to any third party individuals or companies. We will not pass your information on to any third party for marketing purposes without your consent.

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

# 8. Storage and retention of your personal data

We will not store your information for longer than is reasonably necessary or required by law, and/or as needed for the duration of our contractual relationship, and for a maximum of 7 years.

To determine the appropriate period for storing 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.

All personal data is stored electronically within our computer systems and is protected from unauthorised access by our information security management system (ISMS), this is a framework of policies, practices and procedures that increases cybersecurity and safeguards information.

# 9. Your information rights

Data Protection Legislation gives you the following rights in relation to your personal data:

* **The right to access** – You have the right to access your personal data
* **The right to be informed** – You have the right to be informed how and why your data is used
* **The right to rectification** – You have the right for inaccurate data to be rectified, or completed if it is incomplete.
* **The right to erasure** – You have the right for you data to be erased in certain circumstances
* **The right to restriction** – You have the right to restrict processing in certain circumstances
* **The right to object** – You have the right to object to processing in certain circumstances
* **The right to portability** – You have the right to obtain and reuse your personal data for your own purposes across different services
* **The right to withdraw consent** – You have the right to withdraw consent at any time (where relevant)
* **Rights in relation to automated decision making** – You have the right not to be subject to a decision based solely on automated processing, including profiling.
* **The right to complain** – You have the right to make a complaint at any time, if you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we’ve used your data after raising a complaint with us, you can also complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

Address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone number: 0303 123 1113

Website: [https://www.ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint/)

We will aim to respond to any requests relating to your rights without undue delay and in any case within 30 days of your request.

We may ask you to confirm your identity so that we can validate a request. If you would like to make a request, please contact us using the details provided at the top of this privacy notice.

Where you exercise your rights to object, request erasure or request a restriction in the processing of your personal data, we may still need to keep basic contact information about you if you are already or will shortly be an active customer as we will require this for contractual purposes.

# 10. Updates

This privacy notice may change periodically due to changes in our business activities and changes in legal and regulatory requirements. If it does, the up-to-date version will be available on our website or upon request using the contact details at the top of this privacy notice.