

# Privacy Notice and Cookies Policy

Wrisk Transfer Limited respects your **privacy** and is committed to protecting your personal data. This **privacy policy** will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from).

This privacy policy, together with our [cookies policy](#), also explains when and why we collect personal information about you when you visit our website, how it is used, who we share it with and your rights as the data subject.

When we ask you to provide certain information or obtain certain information by which you can be identified, rest assured that your information will only be used in accordance with this policy.

We acknowledge and agree that we will safeguard your personal data in line with the Data Protection Act 2018 and with the General Data Protection Regulation 2018.

## Who are we?

MINI Car Insurance is Introduced by BMW Financial Services, managed and administered by Wrisk Transfer Limited and underwritten by Great Lakes Insurance SE.

Wrisk Transfer Limited is a wholly owned subsidiary of Wrisk Limited. Wrisk is a trading style of both companies and this policy applies to both entities as Joint Data Controllers.

## Registered address:

25 Moorgate  
London  
EC2R 6AY

## What type of information do we collect from you and how is it used?

When you contact us for a quotation we use your data for the purpose of providing a quotation and to administer your policy.

When you visit our website, we use a third party analytics service to record information about your visit in ways which do not personally identify you.

We collect two types of information;

1. Personally identifiable information on you and any named drivers
2. Sensitive information on you and any named drivers

Predominantly this information is used in order to carry out our contract with you to arrange and manage your insurance policy. Note that in order to perform this contract Wrisk uses your personal

data to make automated decisions. Additionally we will use it for statistical and analytical purposes in order to improve our products and services.

### 1. Personally identifiable information

What we collect:	Why we collect it:	Our lawful reason:	How long we keep it for:
Information you directly provide to us for a quote i.e personal information about yourself and named drivers, your vehicle and your insurance needs. This continues throughout your policy period for any amendments, cancellations and renewals.	To understand the level of risk you represent and price your quote correctly. We also use this to search publicly available fraud databases. This information will also be included in an anonymised aggregated database so we can analyse and improve our question sets and pricing models for the benefit of our customers.	Performance of a contract. Article 6b.	The duration of your policy and for 10 years after termination of the contract.
Data about you or anyone insured to drive on your policy with regards to motoring offences and convictions. <i>Information you provide about anyone other than yourself will be processed on the basis you have obtained their explicit consent.</i>	To understand the level of risk you and/or any named drivers represent, assist with decisions about the provision and administration of insurance and to price your quote correctly.	Performance of a contract. Article 6b.	The duration of your policy and for 10 years after termination of the contract.
Your email address	To email you your policy documents and send other relevant notifications about your policy.	Performance of a contract. Article 6b.	Until the end of your policy with us or until we no longer require it for claims purposes.
Your email address	We will communicate with you about relevant news, updates and promotions related to Wrisk, BMW group of companies and	Consent. Article 6a.	Until you exercise your right to be forgotten or until we no longer need the information, whichever comes first.

	authorised suppliers of BMW and MINI Products.		
Details of any reported and actual claims including, but not limited to, cause of loss, value of total loss and total loss insured.	This will go into our anonymous data set to improve our products, services and pricing model.	Legitimate interests. Article 6f.  Legal obligation. Article 6c.	7 years after claim settlement after which time it will be pseudonymised.
Correspondence between you and Wrisk including conversations on our chat function, via email and on the telephone.	To better assist you and other customers and to provide flexible ways in which customers can contact us.	Performance of a contract. Article 6b.	The duration of your policy and for 10 years after termination of the contract.
Recording of telephone calls between you and Wrisk.	Training and quality purposes.	Legitimate interest. Article 6f.	The duration of your policy and for 10 years after termination of the contract.
Recording of telephone calls between you and Wrisk.	Compliance monitoring	Performance of a contract. Article 6b.	The duration of your policy and for 10 years after termination of the contract.
Sanctions lists and fraud detection databases	Prevention of money-laundering, fraud and illegal activities.	Legal obligation. Article 6c.	Indefinitely.
Pages visited, browser type and settings, cookies, and similar tracking information, and wifi/cellular access.	To calculate anonymous, aggregate statistics and to improve the features and usability of our website.  View our <a href="#">Cookies Policy</a> for more details.	Legitimate interests. Article 6f.	We would keep this information as per our retention policy after which it will be pseudonymised.

## 2. Sensitive information

What we collect:	Why we collect it:	Our lawful reason:	How long we keep it for:
<p>Sensitive data about your health or the health of anyone insured to drive on your policy. Information you provide about anyone other than yourself will be processed on the basis you have obtained their explicit consent.</p>	<p>To understand the level of risk you and/or any named drivers represent, assist with decisions about the provision and administration of insurance and to price your quote correctly. This information will also be included in an anonymised aggregated database so we can analyse and improve our question sets and pricing models for the benefit of our customers.</p>	<p>Public Interest. Article 9g.</p>	<p>The duration of your policy and for 10 years after termination of the contract.</p>
<p>Any personally identifying data of another individual, submitted by yourself on their behalf, including sensitive data and any criminal data.</p>	<p>To understand the level of risk you and/or any named drivers represent, assist with decisions about the provision and administration of insurance and to price your quote correctly. This information will also be included in an anonymised aggregated database so we can analyse and improve our question sets and pricing models for the benefit of our customers.</p>	<p>Legitimate Interest 6 (f) Public Interest. Article 9g.</p>	<p>The duration of your policy and for 10 years after termination of the contract.</p>

## Your rights as the data subject

As the data subject you have rights to the information we hold on you. These are as follows:

- Right to **access** the personal information we hold
- Right to **rectification** of inaccurate personal data concerning you
- Right to **erasure** i.e a right to ask us to delete the personal data we hold on you
- Right to **restriction** of processing if the information held is incorrect or it is being held unlawfully
- Right to data **portability** i.e to receive from our controller all the personal data concerning you in an easily readable format and for you to transmit this data to another controller should you wish to
- Right to **object** to direct marketing

If you would like to exercise any of these rights then please contact our Data Protection Officer (DPO) at [privacy@mini-car-insurance.co.uk](mailto:privacy@mini-car-insurance.co.uk).

Please also contact our DPO if you wish to make a complaint about how we have handled your data and if you feel that we have used your data not in accordance to the law then you can complain to the Information Commissioner's Office <https://ico.org.uk/>.

## Who has access to this information?

As your insurer, Great Lakes Insurance SE will have access to your information. They are an additional Data Controller under this policy and specific information on how they use your data is available on their website

[https://www.munichre.com/site/corporate/get/documents\\_E572303901/mr/assetpool.shared/Documents/0\\_Corporate\\_Website/2\\_Reinsurance/World-Wide/Great-Lakes-UK/Great\\_Lakes\\_Insurance\\_SE\\_Information\\_Notice\\_en.pdf](https://www.munichre.com/site/corporate/get/documents_E572303901/mr/assetpool.shared/Documents/0_Corporate_Website/2_Reinsurance/World-Wide/Great-Lakes-UK/Great_Lakes_Insurance_SE_Information_Notice_en.pdf)

Where you have selected Legal Expenses insurance, ARC are an additional Data Controller under this policy and specific information on how they use your data is available on their website

<https://www.arclegal.co.uk/privacy-statement-and-cookies-policy.html>

If you make an application for credit, Premium Credit, our credit provider will have access to your information and may also perform a full credit check. They are an additional data controller and specific information on how they use your data is available on their website.

<https://www.premiumcredit.com/privacy-notice>

We will also share your details with BMW Financial Services (GB) Ltd. BMW Financial Services (GB) Limited, registered office: Summit ONE, Summit Avenue, Farnborough, Hampshire, GU14 0FB and

Wrisk Ltd are not part of the same corporate group. BMW Financial Services (GB) Ltd and the BMW group of companies are Data Controllers and will use your personal details to:

- confirm, update and improve their customer records;
- analyse and develop their relationships with you;
- help in processing any applications you make;
- identify and market products and services that may be of interest to you either directly or via Wrisk;
- carry out statistical analysis.

The BMW Group may also disclose your information to authorised BMW/MINI Retailers and other carefully selected partners so they may let you know about other appropriate products or services which they feel may be of interest to you. The BMW Group will not sell your information to third parties.

We may also share your information with regulators, our claims provider, technology partners, credit or ID checking sites and authorities when relevant.

We will not sell or rent your information to third parties and will not share your information with third parties for marketing purposes.

### **Transferring your information outside of Europe**

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Economic Area (EEA). If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy. For example Mailchimp provides our mailing list management and is based in the US but has signed up for the US-Privacy Shield to be compliant with EEA adequacy provisions.

### **How you can access and update your information?**

The accuracy of your information is important to us and we therefore take such reasonable steps to ensure the personal information we collect and hold about you is accurate, up-to-date and complete. However we rely on the accuracy of the personal information you provide to us.

We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date or you wish to exercise your right to ask for a copy of the information Wrisk hold about you, please email us at [privacy@mini-car-insurance.co.uk](mailto:privacy@mini-car-insurance.co.uk).

When making a request for access and/or correction, your request should be accompanied by sufficient identification and by any information that is reasonably necessary to locate the personal data sought.

Once we receive a request for access and/or correction we will respond to that request within one month after the request is made.

### **Review of this policy**

We keep this Policy under regular review and may change this policy from time to time. The Policy was last updated in August 2018.

Please check this page occasionally to ensure that you're happy with any changes.

## **COOKIES**

### **What are cookies?**

A cookie is a small text file that's stored on your computer or mobile device when you visit a website, which can remember your activities and preferences.

### **Why do you use cookies?**

We use cookies to tailor our content to make it more relevant to you. We also use some cookies provided by other companies whom we trust, which may track things such as how long you spend on the site and the pages that you visit. Understanding how customers are using our site and products helps us improve the customer experience.

### **How can I turn cookies off?**

Should you wish to, you can prevent the use of cookies by adjusting the settings on your browser (see your browser help for how to do this), but this does mean things might not work as expected.