Privacy Policy

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Applies To: Consultants, contractors, suppliers, clients, professional representatives, counsel, experts and third parties acting for or with LumioLex

1.0 Introduction

This Customer Privacy Policy will help you understand what data we collect from you, why we collect it and what we do with it. This policy explains how we store and use your personal information when you interact with our website, or where we otherwise obtain or collect your personal information.

Please note in this Privacy Policy, "our", "we" and "us" refer to LumioLex Ltd, trading as LumioLex Ltd.

This Privacy Policy applies to all products and services offered by us except where otherwise stated.

Please note: If you give us personal information about other people such as joint policy holders on home insurance or additional drivers for motor insurance you must make sure they are aware of this privacy policy.

We reserve the right to change our Customer Privacy Policy from time to time and without notice and encourage you to check regularly for any changes that may have taken place. If we decide to change our Customer Privacy Policy, we will update the Customer Privacy Policy page content and last modified date on our website.

This Customer Privacy Policy was last modified on 13th June 2024.

2.0 Privacy Statement

We are committed to keeping your personal data safe and to ensuring the integrity and security of any personal data we may process.

You should read this privacy notice carefully as it contains important information on the way in which we will process your personal data, in particular:

- The personal information we collect about you
- Our legal bases for processing your personal information
- What we do with your personal information
- Who your personal information may be shared with
- Your rights as a data subject under data protection legislation
- The period for which we will retain your data

3.0 Who are we?

We are LumioLex Ltd and we are the controller of our customers and prospective customers personal data for the purposes of data protection legislation. We are committed to protecting your privacy and adhere to the relevant data protection legislation.

Our Data Protection Officer contact details are:

Caroline Lamming-Chowen, 16 Hawthorne Road, Cannock, WS12 0RX

If you have any queries or requests concerning your personal information or how we process it, please contact us via the Data Protection Officer using the details in section 12.

4.0 Personal Information we collect or obtain about you

We collect personal data relating to you and your use of our services from a variety of sources. These are detailed below along with descriptions of what we do with this information.

We collect personal data directly from you such as your name, occupation, date of birth, address, telephone number, email address, and insurance history via:

- Service data - your personal data that is provided in the course of the use of our services.
- Enquiry data - information contained in any enquiry you submit to us regarding products and/or services.
- Transaction data - information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website.
- Notification data - information that you provide in any promotions, competitions, feedback forms.
- Correspondence data - information contained in or relating to any communication that you send to us.

We may also obtain your personal data, which is gained indirectly or passively in the following ways:

- Usage Data - information we gather from your use of, and interaction with, our website and the devices you use to access them.
- Third party data - publicly available data from third parties about you as an individual, including financial history and insurance claim information, information from insurance price comparison websites.

5.0 Our use of cookies

If you visit the LumioLex Ltd website, we will collect information about your online activity in a "cookie". A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone). It allows us to recognise the device you are using and store some information about your preferences or past actions.

The cookies we use are non-privacy intrusive, which means they do not contain personal information that is unique to you as user of our website.

There are cookies we use that are strictly necessary and essential for the use of our website, without these you will not be able to complete online quotes or purchases. We also use cookies for our legitimate business interests to improve the website experience and to analyse the number of visitors to our website.

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To see full details of all the cookies we use please visit www.LumioLex.com

Our website contains links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their Privacy Policy.

6.0 How we use your personal data

We will only process your data where we have a legal basis for doing so.

We use your data to communicate with you and to offer you our services and products. We will also use your data to improve or maintain the services we offer to you. We will never use your data for any other purpose unless we firstly gain your consent to do so.

We rely on several legal bases for collecting and further processing your personal data. These are:

- Contract
- Legal Obligation
- Legitimate Interest
- Special Category Data and Criminal Offences

6.1 Contract

We collect personal information about you when you apply for products or services. We will ask you to provide some information about yourself for security, identification, and verification purposes.

We may also monitor and record communications with you (such as telephone calls and emails) for quality assurance, training, fraud prevention and regulatory compliance purposes.

We will also collect personal data for the purposes of the performance of a contract with you, such as:

- Preparing a transaction, such as an insurance quotation.
- Processing a transaction, including that with a trusted third party (more details of the types of third parties we work with can be found on our website).
- Providing access to your policy details though your online account.
- Administering your policy, including handling any claims.
- Communicating with you about your policy.
- Offering renewal terms, or to inform you that we are unable to offer such terms.
- Carrying out automated decision making, only where this is necessary for entering into or the performance of a contract with you.

'Automated decision-making' is where a decision is made without human involvement, such as providing an instant insurance quotation on demand without the need of human intervention. It forms a necessary part of our quote process because it is the only practical way to process your data quickly enough to give you an immediate quote. It is your choice as to whether to accept the quote, meaning it does not create a contract at point of quote and a quote itself carries no detriment to you. Automated decisions do not form part of our claims or complaints processes.

6.2 Legal Obligation

We may also process your personal information to allow us to comply with certain legal obligations we are subject to. We are required to adhere to several regulatory frameworks, including that imposed by the regulatory authority, the Financial Conduct Authority (FCA), with whom we work openly and co-operatively. We will also work co-operatively with the national data protection authority, the Information Commissioner's Office (ICO), in relation to any data protection matters that may arise. We may also be required to share your information with law enforcement agencies.

6.3 Legitimate Interest

We may use your personal data for our legitimate business interests, whilst carefully considering and balancing any potential impact on you and your rights as a data subject under the relevant data protection legislation.

This may include processing your personal data to allow us to provide the best services and customer experience and to ensure products are relevant and tailored to your needs.

We will always ensure that our legitimate interests will never override your rights and freedoms under data protection legislation. As an example, we may process your personal data for the following purposes:

- For Direct Marketing purposes, relating to products and services that are compatible with the original purpose for which we originally gained the information.
- To communicate with you in relation to the product and services for which you received a quotation, including newsletters and marketing materials.
- To communicate important updates about our products or services, which we think may be of interest to you.
- For evidential purposes to effectively manage and maintain records of our relationships/communications with you.
- To enhance, modify, personalise or otherwise improve our services and communications for your benefit.
- To better understand how you interact with our website and content in order to enhance your customer experience.
- To determine the effectiveness of promotional campaigns to inform our marketing strategy.

In addition, we may perform statistical and other analysis on the personal data we collect, to help us understand and improve on how people use our products or services. Furthermore, we may use data to test our system to ensure functionality.

Please note, you have the right to object to or restrict the processing for which we rely on legitimate interest as the legal basis. To do so, please use the contact details for our DPO which can be found in section 12.

Where we rely on legitimate interest as the legal basis for sending you direct marketing you have the right to object to this processing. You can opt-out or update your marketing preferences. Please see section 11.5 for more information.

6.4 Special Category Data and Criminal Offences Data

We may ask you for information about medical conditions you have (considered special category data) or criminal convictions you have received. This is lawfully processed as it is required for the performance of a contract or to take steps to enter into a contract. However, due to the sensitive nature of this type of data there are additional conditions required for processing this type of data. This data is processed as it is 'necessary for reasons of substantial public interest' as set out in the Data Protection Act (2018).

7.0 Who we share your data with

We do not sell, trade, or otherwise transfer your personal information to outside parties other than necessary sharing. Necessary sharing includes governmental bodies or trusted third parties who assist us in operating our website, conducting our business, servicing you and for fraud prevention, so long as those parties agree to keep this information confidential.

We share your data with third parties to help provide you with our products and services in the following ways:

- Third parties necessarily involved in the actual or proposed transaction such as the insurer to set up your policy.
- Trusted suppliers who provide us with services necessary for the transaction or processing of your order, for example print and mailing services.
- If you make a claim, the relevant claims administration company or department appointed by us to process your claim.
- Financial Conduct Authority and other regulatory or governing bodies including the Police as part of our legal or regulatory responsibilities.
- Auditors for auditing purposes.
- Payment card and financial credit companies who process payments from you on our behalf.
- If you choose to pay for your policy by instalments, the relevant premium finance company which will provide any finance. They may carry out credit, affordability, identity or anti-money laundering checks on you, potentially using third party agencies. If a check is carried out and depending what type of check it is, then a record of the search or other information may show on your credit file and might affect your credit rating.
- Recognised centralised insurance industry applications, policy and claims checking systems, for example the Motor Insurance Anti-Fraud and Theft Register, all DVLA databases, the UK Fraud Prevention Service (CIFAS), the Employers' Liability Tracing Office (ELTO) and the Claims and Underwriting Exchange (CUE). CUE holds a record of incidents reported to insurance companies by policyholders and third-party claimants and provides validation of the information provided by you, both about yourself and about any other person named on the application, against the information held on CUE and against other databases hosted by IDSL. Insurers may use this information to consider whether to accept the risk. These checks are completed for fraud prevention purposes. For details relating to information held about you on the Claims and Underwriting Exchange please visit www.insurancedatabases.co.uk
- Credit reference agencies for the purpose of identity verification and fraud prevention, their search may appear on your credit report whether or not your quote proceeds but will not impact your credit history.
- Any party named in your policy and transactional documentation.

The full list of 3rd Parties we use is available on our website.

8.0 Data processed outside the European Economic Area (EEA)

Some of the third-party suppliers we use may be located in countries outside of the EEA.

For example, we use third party software suppliers to process data such as your email address and other contact details to help manage our customer service.

When data is transferred outside of the EEA, it will be kept securely and only used for the purposes set out in this Privacy Policy. We will ensure the data has the equivalent protection as it would be if it were processed in the UK.

This is done by the third party obtaining our prior written consent. We will only provide consent where that third party's country or organisation provides adequate safeguards, as recognised by the UK's Information Commissioner's Office (ICO). Where the third party is located in the United States, they must participate in and adhere to the UK-US Data Bridge and be listed on the Data Protection Framework List (DPF). If they are not listed, an alternative appropriate safeguard must be used to transfer data with equivalent protection as it would be if it were processed in the UK.

Our insurance partners are the data controllers in respect of the processing they carry out, and such processing will be subject to their own Privacy Policies. We do not have any control over whether they process your personal data outside the EEA. You should refer to their Privacy Policy for this information.