



Privacy policy

Who we are

In this Privacy policy references to “we”, “us” and “our” are to SPB UK & Ireland Ltd.

SPB UK & Ireland Ltd is the group name of the following companies:

- Citymain Administrators Ltd.
- Citymain Ltd.
- Burnett & Associates Ltd.
- Burnetts Computer Services Ltd.
- Phone Service Centre Ltd.
- Loyal Insurance Services Ltd.
- Square Pound Ltd.

All of these companies are responsible for looking after your personal data and are governed by this Privacy policy.

At SPB UK & Ireland we collect and use personal information for insurance policy, claims and card loss administration services. We are aware of our responsibilities to handle your personal data with care, to keep it secure and comply with applicable privacy and data protection laws. We will ensure that transfers of personal data to a third country or an international organisation are subject to appropriate safeguards in accordance with UK GDPR.

Privacy Policy

The purpose of this policy is to provide a clear explanation of when, why and how we collect and use information which may relate to your “personal data” and explains your statutory rights.

1. What information we collect and how

We will collect data from you when you contact us directly for a policy quotation or visit one of our websites*. If you purchase a policy from one of our business partners your personal data will be provided to enable us to provide policy, claims and card loss administration services.

We may also collect information about you from other sources to help fraud detection and financial crime prevention. These other sources include registers held by reputable organisations.

The data collected may include:

- Any personal details you provide when requesting a quotation or when you purchase insurance such as name, address, email address, telephone number, bank sort code and account number if your policy is paid by monthly direct debit.
- Or
- Any personal details forwarded to us by a third party on whose behalf we are providing a policy, claim or card loss administration service on behalf of the third party.
- Your IP address (this is your computer’s individual identification number) which is automatically logged by our web server. This is used to note your interest in our website.
 - Your preferences and use of email updates (if you select to receive email updates on products and offers).
 - Session information stored in cookies, these do not include any personal information and are used to ensure the correct data is extracted from the database when using our interactive systems.
 - Our websites may use Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your

SPB UK & Ireland

SPB UK & Ireland Ltd is registered in England and Wales under company No. 07015206. The registered office for SPB UK & Ireland Ltd, and the subsidiaries listed below, is 3000, Lakeside, North Harbour, Western Road, Portsmouth, Hampshire, PO6 3EN.

SPB UK & Ireland Ltd is the group name of Citymain Administrators Ltd, (FRN 306535, Company No. 03979666), Burnett & Associates Ltd, (FRN 305511, Company No. 01472537), Square Pound Ltd (FRN564471, Company No. 07665065) and Loyal Insurance Ltd (FRN 430316, Company No. 05350177), who are authorised and regulated by the Financial Conduct Authority. SPB UK & Ireland Ltd is also the group name of Citymain Ltd (06835729) and Phone Service Centre Ltd (08825695).



computer, to help the website analyse how users use the site. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the/our website. By using the/our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

- Any additional information you submit to make a claim for example date of birth, name and address of the device user and vehicle registration number if item stolen from a car and other information you provide when making a claim. Further we may hold police crime reports.
- Any additional information you submit while using any of our websites.

*Please note that some elements of our websites are managed and operated by our Group Head office at 71 Quai Colbert 76095 Le Havre Cedex France, and therefore will be subject to the following:

In accordance with French data protection legislation of January 6, 1978 as amended by the Act of August 6, 2004 (articles 38-43 of Act no. 78-17 of January 6, 1978 concerning “Information Technology, Files and Freedom of Information”) you have the right to access, change, correct or delete information that refers to you by name. To exercise this right, you should write to spb-dpo@spb.eu

For information on France’s data protection legislation, please visit the website of the French Commission Nationale de l’Informatique et des Libertés at www.cnil.fr.

2. What we use your information for

Any personal data we collect from any website or by other means will be used in accordance with the Data Protection Act 1998 and General Data Protection Regulation.

The details we collect will be used as follows:

- If you are a prospective insured person we will use your personal data to consider an application to provide a quotation for an insurance policy, assess and evaluate risk, and, subject to applicable terms and conditions, provide you with a policy on the behalf of the insurer.
- To provide any related services such as policy administration in connection with any product you have purchased. In respect of claims handling services, the data will be used to assess the claim made and to evaluate the risk of fraud. We will also use personal data related to a claim to inform the renewal process and potentially future policy applications.
- To invite renewal of your policy, where applicable
- To contact you for marketing purposes but only where we have appropriate permissions to make contact.
- To analyse information in our various systems and databases to help improve the way we run our business and to provide a better service. To do this, we will use third party organisations for monitoring how customers use any website and issuing our e-mails for us. Please note where appropriate anonymised data fields will be used (particularly in relation to policy and claim information). In respect of Google analytics, the information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for evaluating your use of the website, compiling reports on website activity

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for us and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

3. Protecting your privacy

We process the above-mentioned categories of personal data for the purpose of providing you with a response to any request/inquiry for information that you may have sent us via forms. Indirectly identifiable data may be collected during the User's browsing. The User is invited to refer to the section on "Cookie Usage Policy" below to find out more about the purposes of cookies and his/her associated rights.

4. Who do we share your personal data with

We work with third parties to help manage our business and deliver services. These third parties may, from time to time, need to have access to your personal data. In addition, access may also be required as follows:

- the Insurer of the policy and regulator and organisations working to prevent fraud in financial services may require access to your personal data. We require all of our service providers to respect the confidentiality and security of personal data.
- When providing a service in relation to a claim; loss adjusters and service providers for the repair and replacement of an item and third parties who help manage our IT and back office systems.
- We may be under legal or regulatory obligations to share your personal data with courts, regulators, law enforcement or in certain cases other insurers.

5. Direct marketing

The data collected is kept for a period of three (3) years from the date of recording.

6. How long do we retain your information

The data collected is intended exclusively for SPB.

Unless compelled to do so by a judicial authority or by law, or to protect the rights and interests of SPB, data will not be communicated, shared, made available or sold to third parties without the express prior consent of the data subjects.

7. Your rights

You can ask us to amend or remove your personal data held by us. However, please note that we may need to keep some personal data for legal and regulatory purposes. You also have the right to request a copy of any personal information we hold about you. Please contact our Data Protection Officer below for any of these requests.

Data Protection Officer :

SPB UK & Ireland
3000, Lakeside, North Harbour, Western Road,
Portsmouth, Hampshire,
PO6 3FQ

Email: compliance@spbuk.com

Telephone: 02392 836839

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Where we have received your request for a copy of your personal information, we will respond within thirty days of receipt. We will not ask for a fee unless your request for access to information is excessive. In this instance the fee will be reasonable, and we will advise you of the fee due before completing your request. You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another Data processor but in each case only where you have provided consent.

You can object to any processing of your personal data which has our 'legitimate interests' as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

8. Automated decisioning in claims

In some cases where you register the need to make a claim under your policy, we may use automated processes to determine whether your claim falls within the scope of cover. This decisioning includes logic around the covered circumstances and is directly related to any cover and limits in place. We have relevant quality processes in place to ensure the accuracy of any claims decision where an automated process is in place.

9. complaints

You have the right to lodge a complaint with the Information Commissioner's Office about our processing of your personal data. We ask that you please attempt to resolve any issues with us first, by contacting the Data Protection Officer at compliance@spbuk.com.

10. Websites

This privacy policy only covers this website. Any other websites which may be linked to by our website are subject to their own policy, which may differ from ours.

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