

# Peppercorn Privacy Policy

## Who We Are

We're Peppercorn, and our mission is to use technology to give control back to our customers. For brevity, in this Privacy Policy, references to 'Peppercorn', 'we', 'us', or 'our' means the following companies: Peppercorn Insurance Services Limited (Company Number 12672069) & Peppercorn AI Technology Limited (Company Number 12672070) ; While 'you' refers to any potential or existing customer or anyone who uses the [peppercorninsurance.com](https://www.peppercorninsurance.com) and/or the [peppercornai.com](https://www.peppercornai.com) websites.

Throughout this document, 'Data Protection Law' means the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Privacy and Electronic Communications Regulations 2003 (PECR), as amended from time to time, and all other privacy and data protection laws and regulations, as well as any codes of practice issued by the ICO (Information Commissioner's Office).

For the purposes of the Data Protection Law, we and the insurer named on your motor policy, plus the insurer of any optional products you purchase (such as breakdown or legal products) are data controllers. This means that we are jointly responsible for holding your personal information safely and ensuring the lawful processing of your data in accordance with Data Protection Law.

We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this Privacy Policy, or our practices with regards to your personal information, please [contact us online](#) or [email us](#).

## The Personal Data We Collect

To enable us to provide you with our services we need to process your personal data. This is a combination of data we collect directly from you, and data from external sources, both public and private.

Personal information we collect about you may include the following:

- Your name, home address, email address and phone number(s);
- Your current job and employment status, residency, home ownership status, marital status, children at home;
- Your financial information such as credit history, income, previous claims history, and whether you are on a sanctions list (a government list prohibiting or restricting firms ability to transact with individuals and entities) or classified as a PEP (Politically Exposed Person);
- Your NCB (No Claims Bonus) amount and your motoring claims history;
- Your DLN (Driving Licence Number), type of licence, length held, entitlements;
- Information about your vehicle, including its tax and MOT status;
- Information about any named drivers on your policy;
- Your Internet Protocol (IP) address, device details, how you've interacted with our website and services, time spent on our website, and other analytical information;
- Your payment card and/or banking details if you purchase a policy from us.

We may also collect some information which is defined as 'special category' data. This includes:

- Motoring and non-motoring criminal convictions and CCJs (County Court Judgements)

- Your medical history (as it pertains to your legal right to drive a vehicle)

As part of our validation processes we send and receive information about you to trusted third parties, for example, the Driver and Vehicle Licensing Agency (DVLA), MyLicence, the Motor Insurance Database (MID), the Claims and Underwriting Exchange (CUE), credit checking agencies, and device identification and fraud detection data. The additional information we receive from these databases allows us to confirm your identity, your risk details, and assess your credit score.

When you provide us with information about another person, for instance a named driver on your quote or policy, you acknowledge that you have their permission to share their data and they understand how we'll use it. Best thing to do is to show them this privacy policy too.

## When We Collect Data

There are a number of occasions when we may collect personal data from you:

- When you request a quote from us, either directly or via a PCW (Price Comparison Website);
- You purchase a policy from us;
- You make a claim against a policy you hold through us;
- When we request additional information from you for validation purposes;
- When you interact with us, register for information, or take part in surveys.

## How We Collect Data

Most of the personal information we collect is provided directly from you, but in order to understand more about you and provide you with appropriate insurance cover and to improve our marketing interaction, we also supplement and combine the personal information that we collect from you with data from other sources as shown below.

### Through digital Interactions with us

We monitor and record all communications between ourselves and you, including conversations on our website. We also collect information through cookies and a method called device fingerprinting. You can change your cookie settings to choose whether you want to accept cookies, and which ones, from any website via your browser settings. However, deleting or disabling cookies may impact the functionality of our website for you. You can view our cookie policy [online](#).

### Via MyLicence

When you provide your DLN (Driving Licence Number) we will use the MyLicence service to obtain information from the DVLA driver database. This information includes:

- The type of licence you hold, and how long you've held it;
- The types of vehicle you're entitled to drive;

Any motoring convictions still on your licence, including dates, type, points, fines, and any ban duration.

This information is used by us to:

- Reduce the number of questions we need to ask you;
- To provide you with a quotation;
- To administer your policy;
- For counter-fraud purposes.

There are strict controls around what we do with this data, so we won't use it for any other purpose. If you request a car insurance quote from us and don't go on to take out a policy, any personally identifiable data we receive from the DVLA database will be deleted or anonymised (so we can't link it back to you) within 30 days of the quote.

Under our agreement to access this information we are not permitted to share any information we receive from the DVLA database with our customers, so we won't include it in your policy documentation. Neither our digital assistant nor our Customer Service Team will be able to view or discuss issues relating to the data connected to your DLN. Please contact the DVLA if you have any concerns about the accuracy of your driving licence information.

You can view the information that the DVLA holds about you at [www.gov.uk/view-driving-licence](https://www.gov.uk/view-driving-licence), or for more general information visit [www.dvla.gov.uk](https://www.dvla.gov.uk) or [www.myllicence.org.uk](https://www.myllicence.org.uk).

### **Via a No Claims Bonus database**

As part of providing a quotation to you, we will conduct a search against one or more NCB (No Claims Bonus) databases. This is to validate that the information provided is correct and to avoid the need for you to provide separate proof of your NCB entitlement. To do this, we will use some of the information you have provided to match you against the database. This may include your name, date of birth, vehicle registration, postcode and DLN (when provided).

### **Via the Claims and Underwriting Exchange (CUE) & Fraud Prevention Agencies**

CUE is a central database of motor, home and personal injury incidents reported to insurance companies which may or may not have given rise to a claim. We share your personal information with CUE and other third parties providing similar services, as well as fraud prevention agencies. This is to help us verify information provided in respect of the drivers on your quote or policy and to prevent, detect and investigate suspected fraud or illegal activity.

TransUnion "Iovation" is a provider of fraud prevention and account authentication services. Their services help us decide whether to accept transactions from electronic devices by analysing device attributes and cross-referencing against devices used for previous fraudulent or abusive transactions. We'll share information with Iovation if we have evidence that a device has been used in connection with a fraudulent or abusive transaction. If you'd like to know more about how they process data please see [www.iovation.com/privacy](https://www.iovation.com/privacy). If you want to access the information they hold about you, you can contact them at [privacy@iovation.com](mailto:privacy@iovation.com).

Seon is a provider of fraud prevention services which we use to perform checks on IP addresses, emails, and phone number attributes. We use this information to protect our business and customers from fraudulent activities. For more information on Seon and how they process data, please view their website at [www.seon.io](https://www.seon.io).

Lexis Nexis is a provider of information that supports our counter-fraud and insurance activities and provides additional policy insights. If you'd like to know more about how they process data please view

[www.risk.lexisnexis.co.uk/consumer-and-data-access-policies/insurance](http://www.risk.lexisnexis.co.uk/consumer-and-data-access-policies/insurance). If you want to enquire about or access the information they hold about you, contact them at [DPO@lexisnexisrisk.com](mailto:DPO@lexisnexisrisk.com).

### Via Credit Reference Agencies & our Premium Finance Provider

When you apply to take out a policy via ourselves, we and our credit provider PCL, undertake a number of checks to assess any application for credit (where you choose to pay your premium by instalments), and to verify your identity in order to prevent and detect financial crime and money laundering. These checks may also take place if you make an adjustment to your policy or at renewal.

As part of this process we will search against credit reference agency records for information about you and anyone else named on your policy. This involves both public and shared credit and fraud prevention information. This will result in a search footprint being left on your credit files, regardless of whether you proceed to take out a policy or not.

Credit searches, along with other information, may be used by us and companies with access to that information if you apply for insurance or other financial products in the future. This information may also be used for the purposes of debt tracing and prevention of money laundering.

### Who We Share Your Data With

We will only ever share your information with organisations that we trust and where we have a legitimate, legal reason to do so. This includes:

- Our underwriters and their reinsurers in order to be able to underwrite and administer your insurance policy and calculate your insurance premium;
- The providers of any optional products that you purchase through us, please refer to 'Your Agreement with Peppercorn' for more detail on these providers;
- Third parties who need, or have a legal right to your personal data in relation to a claim made under your insurance policy. For example, our claims handling providers (for Car insurance and Personal Accident this is **Davies Group**, for windscreen it's **Glasscare** for Breakdown it's the **RAC**, for all other products it's **Auxillis** - please refer to their own privacy policies for information on how they use your data), recovery agents, car hire companies, our approved repairers, and legal representatives. This also includes individuals involved in an accident which may be covered by your policy, and other insurers;
- PCWs (Price Comparison Websites) where you've used their services to obtain a quote from us;
- Organisations we use to support the provision of your policy and associated services. For instance our payment services providers, cloud based software or services used by us, our printed documentation supplier, accounting, compliance and law firms;
- MID (Motor Insurance Database) as explained in the 'how we collect data' section;
- CUE (Claims and Underwriting Exchange) also as explained in the 'how we collect data' section;
- A NCB database supplier in order to validate and update your No Claims Bonus entitlement in industry databases, as explained in the 'No Claims Bonus database' section above;
- With the FCA, HMRC, fraud prevention agencies, the Police, and other law enforcement agencies in connection with any investigation to help prevent, defeat, or prosecute unlawful activity;
- With the FOS if you raise a complaint about us with them, in order for us to be able to effectively respond and resolve it;
- Credit reference agents as explained in the 'credit reference agency' section;

## How We Use Your Data

We use your information for a variety of purposes in accordance with data protection laws. Examples include:

- to provide you with quotes for insurance products and help us identify you and any policies you hold with us;
- to contact you about quotes you have not taken up;
- to administer policies you hold with us, process insurance claims, to help calculate your monthly premiums, and for debt recovery;
- to detect and prevent fraud, including verifying the information you have provided;
- to tell you about promotions and other news about products and services offered by us or our partners. This could be by the digital assistant, email, telephone, or text messages, and will always be in accordance with any marketing consent provided by you;
- credit scoring and credit checking (see “Via Credit Reference Agencies” section);
- customising the digital assistant and our website to your particular preferences;
- to notify you of updates to our terms and other changes to our products or services that may affect you;
- to contact you in relation to any enquiry you send to us;
- to disclose your information to selected third parties as detailed by this policy (see below);
- for security and counter-fraud vetting;
- to support our continuous product and offerings development and to operate, maintain and improve our services.
- For marketing purposes where we have your permission and we consider it is in your legitimate interest to send you information about our products and services.

## Automated Decisions & Profiling

In order to determine whether we can offer you a quote, and if we can, provide you with a personalised insurance quote, we rely on automated decision-making, including profiling. This will be based on factors that we use to work out the insurance risk, including but not limited to, your driving record, your vehicle, what you use your vehicle for, your address, and your credit score.

This means our rating engine could autonomously determine that you don't meet the acceptance criteria we have set in order to decide whether to provide you with an insurance quote or policy.

## The Legal Basis For Us Processing Your Data

We only use and share your information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations. We may process or share your data that we hold based on the following legal basis:

- Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose;
- Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests, for example providing insurance quotes;

- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of the contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena;
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

## Our Data Retention Period

We will not retain your personal data for any longer than is necessary, nor will we process it for purposes beyond what it was collected for. Regulatory and legal requirements stipulate the duration that we can or must keep information, which varies according to our relationship with you (whether you purchased a policy, or just got a quote). Our underwriters and service suppliers may have different retention requirements which we must abide to, however, we'll never exceed the maximum allowed by law.

When we no longer need your data we'll either delete it or anonymise it (that means it will be impossible to identify you from it).

## Where We Store Data

The Peppercorn data servers are based in the UK. Some of our service providers, which we may share your personal data with (as explained elsewhere in this policy), may be located within or outside the EEA (European Economic Area). The EEA has equivalent data protection standards to the UK. Non-EEA/UK based providers may not have similar legal protections or restrictions in place regarding your data as set out in this policy. However, we'll always take steps to ensure that appropriate safeguards are in place to protect your data, and ensure that your data is given an equivalent level of protection as it is in the EEA. By providing your information to us you consent to these transfers for the purposes explained in this policy.

## Your Rights

The UK GDPR is a key pillar of data protection legislation and provides the following rights for individuals:

- The right to be informed (the purpose of this Privacy Policy);
- The right of access (to receive a copy of your personal data that we hold);
- The right to rectification (to have inaccurate personal data rectified, or completed if it is incomplete);
- The right to erasure (sometimes known as the 'right to be forgotten');
- The right to restrict processing (to restrict or suppress use of your personal data);
- The right to data portability (to obtain and reuse your data across organisations);
- The right to object (to object to the processing of your personal data);
- Rights in relation to automated decision making and profiling (which specifies restrictions on non-human decision making)

For lots more information on the UK GDPR and your rights under it, please refer to <https://ico.org.uk>.

## Marketing Preferences

We would like to keep you informed of developments in the Peppercorn world, this includes the launch of new products and services, and other carefully selected offers or promotions that we consider may be of interest to you. This could be via any communication channel, including telephone, email, social media, text message or via the digital assistant.

If you would prefer that we did not contact you for this purpose, or would like to let us know how you prefer to be contacted, or to confirm the types of products and services that would be of most interest to you, then let us know by [contacting us online](#) or email [help@peppercorninsurance.com](mailto:help@peppercorninsurance.com).

If you visited our site and enquired about any of our services, we may contact you to discuss the options available to you. If you do not want to hear from us in this regard, please let us know by [emailing us](#).

## Who To Contact

If you want to exercise any of your data rights with us, please [contact us online](#) in the first instance. Remember you can always amend the personal data we hold about you.

You can also reach out to us at [dp@peppercorninsurance.com](mailto:dp@peppercorninsurance.com)

## Updates To This Policy

This version of the policy was written in September 2022. We will periodically review this policy and update it accordingly. If you have any thoughts on how we can help make it clearer, then please [contact us online](#), we're always happy to receive feedback.