



Privacy notice

The privacy and security of your data is important to us. This notice explains who we are, the types of information we hold, how we use it, who we share it with and how long we keep it. It also informs you of certain rights you have regarding your personal information under current data protection law.

We will update this notice as required and review at least annually.

1. Introduction

Toledo Insurance Solutions is part of Moorhouse Group Limited collectively '**Company**'. Moorhouse Group Limited is the Data Controller of the information you provide us and is registered with the Information Commissioner's Office for the products and services we provide to you.

2. What information do we collect about you

We collect, use and process **Personal Information** on individuals, including the following individuals who are covered by this Privacy Notice ("**Notice**"):

- (prospective) insured persons, insurance applicants and policyholders ("**Insureds**");
- beneficiaries and other persons named in the insurance policy ("**Beneficiaries**");
- persons filing a claim under an insurance policy ("**Claimants**");
- persons who serve as a witness in light of an insurance claim ("**Witness**");
- collectively ("**Insurance Contacts**");
- individuals working for one of our business partners ("**Business Contacts**");
- individuals who otherwise interact with us online or offline, for instance by visiting our offices or filing a general request for information via our website ("**General Contacts**");
- individuals who use and visit our website ("**Website Visitors**").

This Notice does not apply to **Company** employees, job applicants, or sub agents we deal with.

The **Company** takes its responsibility to protect your Personal Information. In that respect, we are committed to handle your Personal Information in accordance with all applicable data protection laws and be transparent as to how we collect, process and share that information.

This Privacy Notice is designed to inform you how the **Company**, its subsidiaries and affiliates collect and use Personal Information when providing services as an insurance business. It explains how, why and when we collect, use, retain and disclose **your** Personal Information, as well as your own rights in relation to that information.



3. What types of Personal Information do we process?

The Personal Information we process depends on your relationship with the Company as above and whether collection is permitted by applicable law. We collect and process the following categories of personal information from you.

Categories of Personal Information	Relationship with The Company
<p>Website usage data and related identifiers such as technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, and operating system and platform. Personal Information collected by us also may automatically include information about your visit, including the full Uniform Resource Locators (URLs); clickstream to, through and from our site (including date and time); what you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks and mouse-overs); and methods used to browse away from the page.</p> <p>Please refer to our Cookies Policy for more information about how we use cookies.</p>	Website Visitors
<p>Individual details - name, address, gender, marital status, date of birth, nationality, marketing preferences, vehicle details, penalty points, and family details, including their relationship to you.</p> <p>Contact details, as well as further individual information about you in relation to a claim being made under a policy of insurance such including special categories data – such as medical / health information or criminal history – if the nature of the claim necessitates this.</p> <p>Identification details - identification numbers issued by government bodies or agencies, such as your social security number, passport number, tax identification number and driving licence number.</p> <p>Employment history - including information on your previous and current employer, job title, salary, employment benefit option, professional licences and educational/professional qualifications.</p> <p>Financial information - such as bank account or payment card details, income, investment or other financial information including home valuation and household income.</p> <p>Policy/Contractual information - such as details about quotes you receive and policies you hold and with whom you hold them.</p> <p>Fraud and credit related data - such as credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you</p> <p>Risk coverage details - information necessary to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of Personal Information. For certain types of policies, this could also include telematics data.</p> <p>Previous and current claims - information about previous and current claims (including other related insurances), which may include data relating to your health, criminal convictions, or other special categories of Personal Information and, in some cases, surveillance reports.</p> <p>Special categories of Personal Information and criminal convictions data - data concerning your health and criminal offences and convictions data.</p>	Insureds Beneficiaries Claimants



Categories of Personal Information	Relationship with The Company
Contact details , as well as further individual information about you in relation to a claim being made under a policy of insurance such including special categories data – such as medical / health information or criminal history – if the nature of the claim necessitates this.	Witnesses
Professional information and contact details such as information about your employer, your position/title and your professional contact details.	Business Contacts
Visual information such as images collected from security cameras in our offices and basic contact details for visitor registration purposes such as your name, relevant professional information and contact details.	General Contacts
Your marketing preferences .	Website Visitors Business Contacts General Contacts
Inferences drawn from the above-referenced categories of information to assess risk.	All Insurance Contacts
Any other information you voluntarily share with us e.g. when you contact our customer service or otherwise engage with us.	Website Visitors All Insurance Contacts Business Contacts General Contacts

We only process your special category and/or criminal Personal Information where strictly necessary. When we do, we (or our Members) will ask for your explicit consent where such is required in accordance with applicable data protection law, or we rely on a specific authorization in law that allows us to process this information

4. What are the purposes and legal grounds for which your information is used?

Purpose	Relationship with The Company	Legal Ground
<p>To consider an application for an insurance policy, assess and evaluate risk, determine the scope, risk coverage and premium of the policy and where applicable, provide you with insurance cover and any associated services.</p> <p>To manage and administer contracts including or with regard to insurance policies (including dealing with your queries) with you, your employer, our service providers, and our Members.</p> <p>To manage and administer claims under an insurance policy, including assessing and evaluating the merits of a claim and, where relevant to pay a settlement.</p> <p>To monitor risks and claims by performing spot checks.</p>	<p>Insureds</p> <p>Beneficiaries</p> <p>Claimants</p>	<p>The processing of your Personal Information is necessary to perform a contract to which you are a party (the insurance policy) or to take steps prior to entering into a contract with you.</p> <p>The processing of your Personal Information is necessary for us to comply with legal and regulatory obligations.(</p> <p>The processing of your Personal Information is necessary to support our legitimate interests</p>



Purpose	Relationship with The Company	Legal Ground
<p>To perform data analysis, draw up insurance-specific statistics and risk qualifications, and to otherwise improve our insurance and underwriting products and services and carry out market research and risk modelling.</p> <p>To comply with our legal and regulatory obligations as an insurance company, including responding to requests from public authorities and fraud and money laundering prevention.</p>		<p>in managing our business (or those of a third party), in particular to administer insurance policies and applications, claims and assess risk.</p>
<p>To manage and administer claims under an insurance policy, including assessing and evaluating the merits of a claim and, where relevant to pay a settlement.</p>	<p>Witnesses</p>	<p>The processing of your Personal Information is necessary to support our legitimate interests in managing our business (or those of a third party), including to administer claims.</p>
<p>Communicating with you and responding to your queries and complaints, providing you with information about our business upon your request, offering you customer service, and operating, securing and improving our website.</p>	<p>Website Visitors</p>	<p>We have a legitimate interest to operate our website and communicate with you upon your request.</p>
<p>Contact you with respect to products and/or services offered by us which we believe may interest you (including direct marketing).</p>	<p>Insureds Claimants Website Visitors General Contacts</p>	<p>We have a legitimate interest to communicate with you upon your request and send you direct marketing for related products or services.</p> <p>Depending on your location, we may also ask for your consent prior to sending you direct marketing</p>
<p>Carrying out audits and investigations, and to investigate and resolve complaints, grievances or misconduct</p>	<p>Website Visitors Insurance Contacts Business Contacts General Contacts</p>	<p>We have a legitimate interest to manage our business and to ensure that all investigations and proceedings are managed efficiently and effectively.</p> <p>We have a legal obligation to do so.</p>
<p>Preparing for and acting in relation to enquiries, investigations or proceedings, by governmental, administrative, judicial or regulatory authorities, including civil litigation.</p>	<p>Website Visitors Insurance Contacts</p>	<p>We have a legitimate interest to manage our business and to ensure that all investigations</p>



Purpose	Relationship with The Company	Legal Ground
Complying with our legal and regulatory obligations including the prevention and detection of fraud, money laundering and other crimes.	Business Contacts General Contacts	and proceedings are managed efficiently and effectively. We have a legal obligation to do so.
In connection with a potential asset or stock acquisition of Accelerant, or the outsourcing or insourcing of services provided by employees, providing reasonable diligence material to a third party or meeting any disclosure obligations as required by law.	Website Visitors Insurance Contacts Business Contacts General Contacts	We have a legitimate interest to manage our business.
Securing our offices and workplace environment.	General Contacts	We have a legitimate interest to secure and protect our offices and business by taking measures such as visitor registration and CCTV security. We have a legal obligation to do so.
Debugging to identify and repair errors that impair existing intended functionality.	General Contacts	We have a legitimate interest to debug to identify and repair errors that impair existing intended functionality.

If you are in the European Economic Area (“EEA”) or the UK, You have a right to object to the processing of your Personal Information where that processing is carried out for our legitimate interests. Please note however that we may not be able to fulfil this request in all instances.

Before relying on legitimate interests as a legal basis, Accelerant performed a legal assessment to confirm that your rights do not override its legitimate interests. You can request further details on this assessment by contacting us using the contact details listed in Section 14: Contact details

5. Who do we share your information with?

We may share your personal information with third parties and detail below information regarding the disclosure of such information. Should you have any further questions please contact our Compliance Department, contact details are available in section 12.

Disclosure to third parties, such as:-

Insurance partners which consist of Insurers, Insurance Intermediaries or reinsurers.



Insurance industry databases, such as the Claims and Underwriting Exchange where you make a claim so that insurers can check that your claims history is correct. The Insurance Fraud Register and the Employers’ Liability Tracing Office.

Insurance industry bodies, such as the Motor Insurance Database to meet our Road Traffic Act obligations.

Government bodies, such as the Driver and Vehicle Licensing Agency.

Law enforcement or government agencies, fraud prevention agencies and we may permit such law enforcement or government agencies to access and use your personal information where necessary.

Credit reference agencies, this is shared to decide whether to offer you credit to pay your premium by instalments.

Also

Other third parties that assist with the administration of insurance policies, such as claims management companies

Our regulator, accountants, auditors, solicitors and other experts.

Debt collection agencies.

Our third party service providers such as IT suppliers, marketing agencies, payment processing agencies and Finance providers.

The categories of personal information we collect about you and the third parties to whom we disclose that Personal Information for a business purpose are as follows:

Categories of Personal Information	Categories of third-parties to whom we disclose Personal Information
Website usage data and related identifiers	Intra-group entities, service providers and other interested third-parties (in connection to the purpose for which data was collected) as reflected above.
Individual details	
Contact details	
Identification details	
Employment history	
Financial information	
Policy/Contractual information	
Fraud and credit related data	
Risk coverage details	
Previous and current claims	
Special categories of Personal Information and criminal convictions data	
Professional information	
Visual information	
Your marketing preferences.	



Categories of Personal Information	Categories of third-parties to whom we disclose Personal Information
Inferences drawn from the above-referenced categories of information to assess risk.	
Any other information	

In the preceding twelve (12) months, we may have disclosed the above listed categories for a business purpose. We do not sell Personal Information, and in the preceding twelve (12) months, we have not sold Personal Information.

6. International data transfers

The recipients who we share your Personal Information with, as mentioned in **Section 5: Who do we share your Personal Information with?** may be located in countries that may have data protection laws that are different to the laws of your country, and in some cases, may not have an adequate level of data protection, which means that local laws may provide for a lower standard of protection for Personal Information than the one that applies within your jurisdiction.

We don't currently transfer any data to a country outside the UK or EU. If we did need to do this, we would only consider it if the country we were transferring data to had data protection rules compatible with those in the UK or EU and assessment of the adequacy of those rules to ensure appropriate safeguards and enforceable rights and remedies are in place before any such transfer is agreed or effected.

7. What happens if you do not provide us with your personal information?

Depending on the capacity in which you interact with us as set out above, i.e. as a Website Visitor, Insurance Contact, Business Contact or General Contact, we need to process your Personal Information for different purposes (see **Section 4: What are the purposes and legal grounds for which your information is used?**) including to respond to your inquiry, communicate with you, handle claims, assess risk and make decision in regard to your insurance policy application.

If we are not provided with your Personal Information, we are unable to undertake these activities and this may result in, e.g., us being unable to communicate with you or your insurance application being denied because we are unable to assess the risk involved

8. Automated decision-making

Please note that personal information, including sensitive personal information, may be used in the context of making insurance underwriting decisions, where information (such as criminal convictions data) is included as a standard question on a request for a quotation and also referenced for auto-renewal of certain types of policies. This involves automated decision making to determine what the cost of providing or renewing the policy will be. Automated decision making may also be used in relation to the marketing of our products to you, in accordance with preference you have expressed. We will ask you when you purchase your policy if you would like to opt in to auto-renewal. However, even if you opt in at this point, you will always have the right to opt out at any time.

9. How long do we keep personal information?



We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal, statutory and regulatory obligations. For example, so long as there is any possibility that either you or we may wish to bring a legal claim under the insurance policy, or where we are required to keep your personal data due to legal or regulatory reasons. If you would like more information on this matter, our contact details are set out in section 11.

10. Your rights

Under data protection law you have certain legal rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in section 11.

In some cases we may not be able to comply with your request (e.g we may not be able to delete your data) for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we are unable to comply with your request, we will tell you why.

Your rights include-

The right to **access** your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests.

The right to **rectification**

We make every effort to ensure the information we hold about you is accurate and complete, however if you do not believe this is the case you can ask us to update or amend it.

The right to **erasure**

In certain circumstances, you have the right to ask us to erase your personal information. There are occasions when a request made under data protection law is overridden by other legal and statutory data retention requirements.

The right to **restriction or suspension of processing**

In certain circumstances, such as a question over accuracy you are entitled to ask us to stop using your personal information or to suspend its use.

The right to **data portability**

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided us to another third party of your choice.

The right to **object to marketing**

You can ask us to stop sending you marketing messages at any time by either clicking unsubscribe or contacting our compliance team. Details in section 12

The right **not to be subject to automated** decision-making

You have a right not to be subject to a decision based solely on automated means. This includes auto-renewal, so if you have previously agreed to opt in to auto renewal and you change your mind you can opt out by contacting us.

The right to **object to processing**



For certain use of your personal information, we would have gained your consent and in other circumstances, we may process your data using legitimate interest. In both instances, you have the right to withdraw this right of processing, unless it is necessary in connection with our legal rights.

*The right to **withdraw your consent***

Where processing of your Personal Information is based on your consent – you may at any time withdraw your consent however this will not affect any processing we did before withdrawal

*The right to **lodge a complaint with the ICO***

We hope that you would raise any concerns with us and give us the opportunity to resolve. However if this is not possible or you are dissatisfied with our resolution, you have a right to complain directly to the Information Commissioner's Office (ICO):-

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

Tel: 0303 123 1113 (local rate)

Further details of your rights can be obtained by visiting the ICO website at <https://ico.org.uk/your-data-matters>

11. How we protect your information

We follow strict security procedures in the storage and disclosure of your personal information in line with industry practices, including storage in electronic and paper formats.

We restrict access to your information to those that absolutely need such information to carry out the purposes outlined in this Privacy Notice.

We use a range of organisation and technical security measures to protect your information and all our staff are trained on data security.

Firewalls are used to block unauthorised traffic to servers and these servers are located in a secure location, which can only be accessed by authorised personnel. We have internal procedures in place that covers storage, access and disclosure of your information.

12. Contact us

If you have any questions about how we collect, store or use your personal information, you may contact us at:-

Compliance Department, Moorhouse Group Limited,

Barclay House, 2-3 Sir Alfred Owen Way, Caerphilly. CF83 3HU

Or

Email: compliance@ToledoIS.co.uk

13. Updates to this privacy policy (also known as fair processing notice)



If we change our privacy notice, we will post any changes on these pages so that you are always aware of how we use your information. This privacy notice was last updated in February 2024.