

Customer Fair Processing Notice (Customer FPN)

1. [Identification and contact details of the Data Controller](#)
2. [General information: description of the information contained in the Fair Processing Notice](#)
3. [Necessary, up-to-date and accurate information](#)
4. [Data Subject rights exercise](#)
5. [Detailed information on the data processing carried out:](#)
 - 5.1 [If you have requested a quote, you are insured, a policyholder or you are involved in a claim:](#)
 - 5.2 [If you have filed a claim or exercised a right:](#)
6. [Confidentiality](#)
7. [Update of the Fair Processing Notice](#)

1. Identification and contact details of the Data Controller

Hughes Insurance Services Limited, trading as Hughes Insurance, is a broker authorised and regulated by the Financial Conduct Authority, registered in England and Wales, No. 4451375, with registered office at 20 Fenchurch Street, London, EC3M AW and head office registered at Strangford House, 4 Jubilee Road, Newtownards, Co Down, BT23 4WN, member of the Liberty Mutual Insurance Group (hereinafter "Hughes Insurance" or the "Broker") is the data controller for the personal data that is processed within the framework of the relationship between the Broker and the data subjects, as well as through the different communication and contracting channels made available to data subjects by Hughes Insurance. This clause provides information on how the Broker will use your personal data.

In addition, the purpose of this Fair Processing Notice is to provide information on the processing of personal data and the rights under the UK- General Data Protection or "GDPR" and the Data Protection Act 2018 ("DPA 2018") and any other applicable law regarding data protection to customers, to those who have requested a quote, insured persons, policyholders, to those who are involved in a claim, as well as to anyone acting on their behalf (hereinafter referred to as "Customers"), including when they file a claim or exercise a right.

Hughes Insurance has a Data Protection Officer appointed before the Information Commissioner's Office (ICO) under no. Z6923387, who can be contacted at the following address Hughes Insurance, Strangford House, 4 Jubilee Road, Newtownards, BT23 4WN or by sending an email to dataprotection@hughesinsurance.co.uk. If you have any questions regarding the processing of your personal data, please contact the Data Protection Officer at the aforementioned address.

2. General information: description of the information contained in the Fair Processing Notice

In this Fair Processing Notice you will find tables identifying each of the different processing's carried out by Hughes Insurance.

These informative tables will detail:

- The purposes of the processing of your personal data, i.e., the reason why Hughes Insurance processes your personal data.
- The legal basis that allows the processing of data by the Broker for each of the purposes indicated.
- The possible communication of your data to third parties, as well as the reason for such communication. For these purposes, we do not transfer your personal data to third parties except when there is a legal obligation to do so (Tax Authorities, Judges and Courts, Security Forces and Governmental Bodies...), or for communicating them to other companies of the Liberty Mutual Group, never for commercial purposes, or when we expressly indicate it in the table that appears below. On the other hand, Hughes Insurance data processors may also have access to your personal data, i.e. service providers that have access to your personal data for the performance of their services. The service providers who will have access to your personal data would be, in general, information system service providers, technological and telecommunication service providers, cloud computing and network security service providers, anti-fraud, finance and billing service providers, private investigators, claims handling companies, aggregators, assistance service providers, professional service providers where necessary (including solicitors and barristers) or customer service providers. The table below will indicate those other areas for which Hughes Insurance service providers may have access to your data.
- The existence of potential international data transfers. For these purposes, much of our processing activities requires international data transfers to technological service providers or entities of the group to which Hughes Insurance belongs, located in the European Union, United States of America (USA) and India for which the UK Addendum to the pertinent Standard Contractual Clauses or the UK International data transfer agreement (IDTA) apply, or the recipient country is recognized as providing adequate safeguards, including Adequacy decisions, by the ICO. You can request more detailed information regarding the international transfers of your data or the guarantees applied by sending an e-mail to dataprotection@hughesinsurance.co.uk, indicating the specific processing activity about which you would like to receive information about the guarantees applying.
- The retention period of the data you provide us with. For this purpose, we keep your personal data for the duration of the contractual relationship, or for a longer period if you have given us your consent. Subsequently, your data will remain blocked to deal with judicial, administrative or tax claims, during the statute of limitations period determined by the applicable regulations.

3. Necessary, up-to-date and accurate information

Hughes Insurance will process personal data, including sensitive data (for example, criminal convictions, monitoring offences and health data), provided directly by the policyholder, named persons or other parties acting on their behalf, or obtained by other lawful means. Data may be received from third parties, such as other insurance businesses and companies, fraud prevention agencies, police, law enforcement agencies, recognised governing and regulatory bodies, credit reference agencies, lawyers, experts, clinics and hospitals, among other entities whose information must be communicated to Hughes Insurance. In addition, the data process may involve data from related policyholders, insured parties, third-party claimants, representatives, witnesses or/and others.

The personal data processed can be found among the non-exhaustive list of the following categories of personal data: identification data (for example, name, address, email address, date of birth, occupation, financial or bank details, driving history, metadata (for example, IP address,...), telematics data data relation to the policy (for example, policy number, insured property, historical data related to the policy, broker reference number ...claims data (for example, previous claims experience and information about insurance needs, such as car and/or property details, accident information, photographs). We may also process special category of data such as; gender, voice recordings, images, health data...and it may be necessary to process criminal data, including anti-money laundering checks..

You are required to provide us with the data requested through the different forms made available by Hughes Insurance, including Hughes Insurance digital portals, email, telephone or paper forms. If you do not provide us with all information requested, we may not be able to send you communications or provide you with the insurance services you have requested. Likewise, by fulfilling and sending the required information, you declare that the information and data you have provided is accurate and true.

To ensure that the information provided is always up to date and does not contain errors, you must inform Hughes Insurance, as soon as possible, of any modifications and amendments to your personal data that may occur by sending an email to dataprotection@hughesinsurance.co.uk or by contacting the relevant contact point set up for such purposes.

4. Data Subject rights exercise

1. right of **access** to your personal data to find out if it is being processed, and if so, what exactly is being processed and the specific processing activity that is being carried out, including the purposes, categories of data processed and recipients, among other information;
2. right to **rectification of** any inaccurate personal data;
3. right of **erasure** of your personal data when, among other reasons, it is no longer necessary for the purposes for which it was collected, and provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is not a legal obligation;
4. right to **object** to the processing of your personal data, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in [section 5](#), is the legitimate interest of Hughes Insurance or a third party. Hughes Insurance will stop

processing your data unless a compelling or higher legitimate interest for the processing is proven, or in case they are simply kept blocked for the formulation, exercise or defense of claims;

5. the right to request the **restriction** of the processing of your personal data where the accuracy, lawfulness or necessity of the data processing is in question, in which case we may retain the blocked data for the exercise or defense of claims;
6. the right to **portability** of your data, i.e., to receive your personal data in a structured, commonly used and machine-readable format, in order to transmit them to you or to another data controller, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table in [section 5](#), is the existence of a contractual relationship or your consent;
7. the right not to be subject to **automated** decisions that may effect on your legal rights, or that significantly affect you and when such decisions are being made;
8. right to revoke the **consent** given to Hughes for the processing of your data, provided that the legitimate basis that enables us to process your data, from among those indicated in the second column of the table included in [section 5](#), is your consent.

You can exercise your rights at any time and free of charge by sending an email to dataprotection@hughesinsurance.co.uk or at Hughes Insurance, Strangford House, 4 Jubilee Road, Newtownards, BT23 4WN.

In addition, you have the right to lodge a complaint with Hughes Insurance or the Information Commissioner's Office (ICO) if you believe that there has been a breach of data protection legislation in relation to the processing of your personal data. The ICO can be contacted at: <https://ico.org.uk/global/contact-us/>

5. Detailed information on the data processing carried out:

5.1 If you have requested a quote, you are insured, a policyholder or you are involved in a claim:

Purpose of the processing	Lawful basis	Recipients
<p>Evaluate the request for a motor, home, commercial or travel insurance quote, generate an insurance quote and purchasing a policy in addition to inform updates provided by the data subject during the life cycle of policy, provide insurance cover and insurance premium credit facilities. This includes evaluating the level of insurance cover that the customer needs in order to match him/her to an appropriate policy and premium, provide advice on the appropriate insurance product, arrange and administer the insurance contracts and offer, arrange and administer premium credit facilities for the customer.</p> <p>To fulfill these purposes, it may be necessary to carry out certain checks including credit checks, criminal offences, anti-money laundering checks and identity verification, fraud checks and other sanction checks (i.e.: terrorism financing checks) to investigate, detect and prevent fraud, as well as cases of high claim rate.</p>	<p>Depending on the specific action: (i) Consent; (ii) Hughes Insurance legitimate interest in calculating the insurance premium and prevent fraud; (iii) Management of the pre-contractual or contractual relationship; (iv) Compliance with legal obligations (anti money laundering and fraud prevention).</p> <p>In terms of processing criminal offence data we rely upon the lawful basis as stipulated in Schedule 1 of the DPA 2018.</p>	<p>Your data may be transferred within the framework of this processing to insurance companies and agents, underwriting service providers, debt collection agencies, banks, external auditors, consultants, lawyers, sectorial associations, and to LibertyMutual, the parent company of the group to which Hughes Insurance belongs.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, would be mail management and marketing campaigns service providers, aggregators, call recording service providers, telematic service providers, national windscreen service providers, information storage service providers, digital signature service providers, the common databases of the insurance sector, claim records databases, claims investigation providers, and asset solvency databases.</p>

<p>Management of customer accounts, sale of products, administrative management (including amending and updating customer records). Economic and financial services, fulfillment of monetary obligations, as well as managing the contractual relationship with insurance companies (setting up policies with customers, communicating changes to policy).</p> <p>This includes administering payments and engaging with debt collection agencies for the recovery of debt, providing support and responding to all customer (or someone acting on their behalf -solicitor or claims providers-) complaints received through the different means of contact made available to them (telephone, email, social networks, instant messaging applications, etc.), as well as managing contracts, payments, quotes, renewals, cancellations, reimbursements, portfolio transfers, and any other service that customers may request, including changes, supplements or requests for information, among others.</p>	<p>Depending on the specific action: (i) Management of the contractual or pre-contractual relationship; (ii) Consent; (iii) Hughes Insurance's legitimate interest in managing its portfolio of customers in an efficient way and Hughes Insurance legitimate interest to recover outstanding debt.</p>	<p>Your data may be transferred within the framework of this processing to official bodies or public authorities, insurance companies and agents, underwriting service providers, debt collection agencies, banks, external auditors, consultants, lawyers, sectorial associations, and to Liberty Mutual, the parent company of the group to which Hughes Insurance belongs.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, would be communication service providers, aggregators, call recording service providers, telematic service providers, national windscreen service providers, information storage service providers, digital signature service providers, the common databases of the insurance sector, claim records databases, claim investigation service providers, and asset solvency databases.</p>
<p>To manage tax returns and refunds, as well as seizure requests and attempts to recover from private insurance entities; to manage indemnities and compensations in the event of a claim, as well as to prevent defaults and initiate legal actions.</p>	<p>Compliance with a legal obligation.</p>	<p>Your data may be transferred within the framework of this processing to official bodies or public authorities, insurance companies and agents, lawyers, debt collection agencies, banks, external auditors, and to other entities of Liberty Mutual group.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, would be communication service providers, administrator service providers, consultants and legal advice service providers.</p>

<p>Advertisement of Hughes products to existing, former and potential customers with the aim of selling insurance products. Marketing communications may be via phone, email, text or post depending on their marketing preferences. These campaigns may involve profiling.</p>	<p>Depending on the specific case: (i) Hughes Insurance legitimate interest in sending commercial communications supported by soft opt-in; (ii) Consent.</p>	<p>The categories of service providers that may have access to your data, in addition to those listed in section 2, would be communication service providers and marketing service providers.</p>
<p>Develop and optimize insurance products and services, analyze, monitor and plan results and productivity for strategic decision-making, ensure that Hughes Insurance procedures and initiatives are aligned with applicable internal and national regulations and that they comply with all quality standards.</p> <p>It may include the creation of pricing, risk and demand profiles and models, for statistical and actuarial purposes that make it possible to assess risks, predict fraud, evaluate the evolution of claims, the profile of the customer's suitability for the product and determine the premium for the insurance, as well as geocoding services to calculate the premium and improve predictive models.</p>	<p>Depending on the specific case: (i) Hughes Insurance's legitimate interest in: determining the risks and costs associated with contracting a product; predicting and estimating aspects of their business; improving its products and services and carrying out decision-making; and to ensure that all procedures meet the established quality standards; (ii) Management of the contractual relationship.</p>	<p>Your data may be transferred within the framework of this processing to insurance companies and agents, external auditors, associations of the insurance sector, insurance regulators and supervisors and to Liberty Mutual, the parent company of the group to which Hughes Insurance belongs.</p> <p>The categories of service providers that may have access to your information, in addition to those listed in section 2, would be consultancy service providers, survey service providers and asset solvency databases.</p>
<p>Manage IT environment, business operation, including the hosting of data in the cloud, and ensure security of customer data.</p>	<p>Hughes Insurance's legitimate interest in guaranteeing cybersecurity, information security, the performance of applications and the improvement of the services provided.</p>	<p>Your data may be transferred within the framework of this processing to Liberty Mutual, the parent company of the group to which Hughes Insurance belongs.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, are communication service providers, courier service providers and information storage service providers.</p>

5.2 If you have filed a claim or exercised a right:

Purpose of the processing	Lawful basis	Recipients
Complaints and queries about the service: to deal with complaints through the corresponding online web submission provided for this purpose, by telephone, by post, by e-mail or through instant messaging applications. In the event you contact us by phone, your call may be recorded.	Depending on the specific case: (i) Legal obligation to attend to customer or interested parties' complaints; and (ii) Legitimate interest in attending to complaints and queries.	Your data may be transferred within the framework of this processing to the official body, ombudsman or public authority involved in the complaint submitted, as well as, your insurance company, the police or solicitors. The categories of service providers that may have access to your data in addition to those indicated in section 2 , are providers of complaints and customer service, transcriptions and call recording services.
Complaints and queries about the service: to respond to requests regarding privacy and the exercise of rights of access, rectification, erasure, objection, restriction and portability submitted through any of the communication and contracting channels. As well as manage your requests to unsubscribe from commercial communications. In the event you contact us by phone, your call may be recorded.	Legal obligation to attend to complaints regarding privacy or exercise rights of access, rectification, erasure, objection, restriction and portability raised by service providers, customers or any other interested party whose personal data has been processed by Hughes Insurance.	Your data may be transferred within the framework of this processing to the ICO on the basis of this processing if the complaint is received by the ICO. The categories of service providers that may have access to your data in addition to those indicated in section 2 , are providers of call recording services.

6. Confidentiality

The personal data that we may collect through our websites, portals, forms, contact mailboxes, as well as through the various electronic or telephone communications that we maintain with you or your representative will be processed confidentially by Hughes Insurance, with Hughes Insurance pledging to keep these secret in accordance with the provisions of applicable Law.

7. Update of the Fair Processing Notice

This Fair Processing Notice may need to be updated from time to time. We will notify you of the changes where we are required by law to do so.
This Fair Processing Notice was last updated in May 2023