

Telematics Privacy Notice



Data Controller: Clegg Gifford & Co. Ltd, 7 Eastern Road, Romford, Essex, RM1 3NH
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About Us

Clegg Gifford & Co Limited (CG) is committed to the privacy and confidentiality of all individuals and takes its responsibility for data security very seriously. CG is authorised and regulated by the Financial Conduct Authority (FCA) to arrange and administer insurance products. CG is also licensed by the Guernsey Financial Services Commission (GFSC). This includes processing any personal data in a lawful, fair, and transparent manner.

This Privacy Policy explains how we and our technology and analytic providers will collect and use data collected from the telematics device.

Please be aware that data will be collected and transmitted any time the telematics device is switched on and/or off dependent on which device is fitted.

Our Privacy Notice can be found [here](#), and it explains how we will use the information provided and information on your rights, how to contact us and make a complaint.

In accordance with current Data Protection Law, we have provided some specific information about the processing of personal data under this Contract.

What Data We Collect

The following personal data will be collected and used:

- a) personal and contact data of the Policyholder (e.g. his own ID and the detail of the person to be contacted (in case of emergency), vehicle data, policy details);
- b) data collected and recorded by the telematics device (The Device) installed on the vehicle, and then transmitted and stored. This data may include:

- i. journeys made by specific time/period, type of road (e.g. urban roads, suburban roads, motorways) time of day (e.g. day and night hours), geographic locations, start-up time*, breakdowns and malfunctions.
- ii. Identification of vehicle positions, speeds, and accelerations/decelerations equal to or above the threshold of 0,3g (1g corresponds to 9,8 m/s²) if they remain above this threshold for a sufficient time.
- iii. angular velocity in all three axes at an accelerometer event.

* When installed on hybrid or electric vehicles or on cars where the ignition of the vehicle cannot be detected by the battery voltage, the movement of the vehicle is also used to detect the startup time accurately.

Vehicle Added Services (VAS)

At the Policyholder's request, the following services may be available, which they can be used via their own app:

- Car Finder: service that allows the driver (using GPS) to locate the vehicle; and/or
- Speed Limit: service that allows the driver to receive push notifications on the mobile APP when the set speed threshold is exceeded; and/or

- Target Area: service that allows the driver to set a virtual fence on the mobile APP. If the fence is crossed, a push notification is sent to the driver.

We would like to point out that:

- i. the data of each journeys are the personal data of the driver of the vehicle/car;
- ii. the above VAS must not be used to control the people driving the vehicle. A person who uses the services provided for unlawful purposes shall be considered the sole civil and/or criminal Responsible.

Investigation, Assessment, Management and Settlement of Claims and Prevention and Identification of Insurance Fraud (including the management of related legal actions).

In the event of a collision, impact or minor crash detected by the Device, the specific data referred to in the paragraph "What Data We Collect", b), will be transmitted by the Device. The data shall then be made available to CG. The data shall be kept for no longer than is necessary and in all instances in line with our policies and procedures.

The time frame of data collection by the Device is outlined as follows:

- location data (paragraph "What Data We Collect", (b) (i) will either be collected within a 2km spatial frequency on urban/extra-urban roads and 30 seconds on motorways or every minute when the ignition is on and every hour when the ignition is off, dependent on which device is installed to the vehicle.

- the data referred to in "What Data We Collect" (b) (ii) will either be collected in the 60 seconds before and 20 seconds after the crash, impact or event and in the 4 seconds before and 4 seconds after the crash or event (accelerometer/gyroscope) or every minute when the ignition is on and every hour when the ignition is off, dependent on which device is installed to the vehicle.

The transmission of data, depending on the type of Device installed, shall take place at predefined (mileage) intervals, not less than 50 km, or every 15 days if the interval is less than the predefined interval.

In the event of a crash, impact or minicrash detected by the Device or in the event of a claim reported to the CG, the transmission of data shall be brought forward to the time of the occurrence of the event or at the request of the Company.

As a result of technological evolution, both the type of data collected, and the time frames may vary. If you have any doubts, please contact us.

If an accident, theft, robbery or natural disaster is reported, or in the event of a claim, the data relating to journeys will be transmitted, limited to 24 hours before and 24 hours after the time/date indicated in the report or claim, or from the time of the last known position of the vehicle (by way of example: in the event of theft of the vehicle, the time limits may start from the time the vehicle was parked) in order to compare them with the crash, impact or mini-crash data recorded by the Device.

Please note that in the event of theft, the data regarding the routes travelled/journeys after the theft will be made available and provided exclusively to the CG and/or the Authorities for the recovery of the vehicle and/or to ascertain any criminal and/or civil liability.

In this case, the data will be retained for the time necessary to manage the claim and/or in the event of legal proceedings.

In some instances, CG have been granted delegated authority from Insurers to handle and settle claims on their behalf. The data collected by the telematics device may be reviewed and relied upon in order to assist us in handling and settling claims.

Term of storage

The data collected by the Device are subject to different retention periods as follows:

- a) Provision of telematic services.

The journey data referred to in paragraph "What Data We Collect", a) and b) will be stored for a no longer than is necessary and in all instances in line with our internal policies and procedures.

b) UnipolRE pricing.

The data relating to pricing referred to in paragraph "What Data We Collect", a) and b), will be stored and made accessible to UnipolRE for a period of 7 years from collection.

Policyholder Rights

The Driver may request the telematic data collected on his vehicle, e.g. mileage history/telematic data collected, recorded by the Device installed on the vehicle and archived within the terms indicated above (e.g. crash reports, GPS signal verification, specific trip).

Such requests must be made by the Driver, who must contact the CG.

If the Driver is not the Policyholder, the Policyholder must confirm that the vehicle was at the disposal of the Driver.

If the Policyholder wants the data recorded by the Device at a time when the vehicle was not available to him, the Policyholder must obtain authorisation from the driver of the vehicle.