



Privacy Notices

Last updated: Oct 2024

MPL Claims Management Limited ("we" or "us") respect your privacy and are committed to protecting your personal data. This privacy policy describes our policies and procedures on the collection, use and disclosure of your information when you use or are involved with our Services and tells you about your privacy rights and how the law protects you.

This privacy policy applies to the following types of individuals, whose personal data we collect and use (which we refer to as "you"):

- Individuals who have been involved in an insurance claim (claimants and defendants)
- Users of our products
- Clients and perspective clients of the services we provide
- Individuals who contact us through our website

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

This privacy policy contains the following information:

1. INTERPRETATIONS AND DEFINITIONS
2. DETAILS OF OUR DPO
3. THE DATA WE COLLECT ABOUT YOU AND HOW IT IS COLLECTED
4. HOW WE USE YOUR PERSONAL DATA
5. DISCLOSURES OF YOUR PERSONAL DATA
6. INTERNATIONAL TRANSFERS
7. DATA SECURITY
8. DATA RETENTION
9. YOUR LEGAL RIGHTS
10. MISCELLANEOUS



MPL Claims Management Ltd,
The Octagon,
Middleborough,
Colchester, Essex,
CO1 1TG

Registered in England and Wales Company No. 11402352

1. INTERPRETATION AND DEFINITIONS

For the purposes of this privacy policy the following definitions shall apply:

Account	means a unique account created for users to access our products and services
Our product(s)	any product provided by MPL which captures or stores personal and confidential information
Cookies	small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses;
Device	any device that can access the Services such as a computer, a cell phone or a digital tablet;
Personal Data	any information that relates to an identified or identifiable living individual;
Services	the services provided by MPL and/or our Website;
Service Provider	any natural or legal person who processes the data on our behalf. It refers to third-party companies or individuals employed by us to facilitate the Services, to provide the Services on our behalf, to perform services related to the Services or to assist us in analysing how the Services are used;
Clients/Client Users	a user of any product or service offered who has a business interest, provides/owns the data being processed, is legally allowed or has been given permission to access specified data; for example a broker or insurer
Usage Data	refers to data collected automatically and generated by the use of the services;
Website	refers to MPL Claims' website, accessible at www.mplclaims.com



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2. DETAILS OF OUR DPO

We use your Personal Data to provide and improve the Services. By using the Services, you agree to the collection and use of information in accordance with this privacy policy.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below:

DPO Contact Details

You have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name: Stewart Rayment

Email address: Stewart.Rayment@MPLClaims.com

Postal address: MPL Claims Management Limited, The Octagon, 27 Middleborough, Colchester, CO1 1TG;

Telephone number: 01206 646 328

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). In the first instance the ICO recommend that you contact the data holding business in order to resolve any concerns before referring your complaint directly to them.



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3. THE DATA WE COLLECT ABOUT YOU AND HOW IT IS COLLECTED *Types of Data Collected*

Personal Data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). While using our Services, we may collect, or ask you to provide us with, certain personally identifiable information about you, which we summarise as follows:

Type of Individual	Type of Personal Data Collected	Examples
Claimant / Defendant	Personal Data	first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender
Claimant / Defendant	Special Category Data	personal injury information, race, political views
Claimant	Contact Data	billing address, delivery address, email address and telephone numbers
Policy holder	Financial Data	bank account details
Client Users	Transaction Data	details about payments to and from you and other details of products and services you have purchased from us
All product users	Usage Data	internet protocol (IP) address, your login data, browser type and version, operating system and platform; subject to cookie acceptance
All product users	Profile Data	Your email address and password.
Client Users	Business Contact Details	Email address.

Tracking Technologies and Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Website may become inaccessible or not function properly. Please our separate Cookie Policy on our website for more information.



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4. HOW WE USE YOUR PERSONAL DATA

We will only use your Personal Data when the law allows us to. We have set out in the table below a summary of all the ways we use your Personal Data, and which of the lawful bases under the UK GDPR we rely upon for each type of use.

Type of Individual	Type of Personal Data Collected	Purpose/Activity	Lawful basis for processing
Claimant / Defendant	Personal and Special Category Data	Data processed by us, using our products or services for the purpose of insurance claims management.	It is necessary for the purposes of a contract
			We have a legitimate business need
			Is in the vital interest of the data subject or other natural person
All Client Users	Contact Data	Notifying you of any changes to the service we provide, our status (e.g. business merger, restructure, transfer) and managing your requests and relationship to us.	It is necessary to establish, exercise or defend our legal right
			The data subject has provided their consent
			It is necessary for the purposes of a contract.
All Users	Usage Data	To administer and protect our business, our products and Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	We have a legitimate business need



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5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your Personal Data with the parties set out below (and in accordance with the below legitimate interests where relevant) for the purposes set out in the table in section 4 of this privacy policy:

- With Service Providers: We may share your Personal Data with Service Providers to monitor and analyse the use of our Services.
- For business transfers: We may share or transfer your Personal Data in connection with, or during negotiations of, any merger, sale of our assets, financing, or acquisition of all or a portion of our business to another company.
- With Affiliates: We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include our parent company (Ergo UK Specialty) and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- With business partners - we may share your information with our business partners and suppliers to offer you certain products, services or promotions.
- With other users: when you share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- With your consent: we may disclose your Personal Data for a specific purpose with your consent.
- Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court, police, government agency, regulator).

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- comply with a legal obligation;
- protect and defend our rights or property;
- prevent or investigate possible wrongdoing in connection with the Service;
- protect the personal safety of Users of the Services or the public; and/or
- protect against legal liability

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions and under the terms of a contract which includes detailed obligations on them to protect your data and only use it for the purposes of performing their services to us.



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6. INTERNATIONAL TRANSFERS

Your information, including Personal Data, is primarily processed and hosted within the UK.

We may also transfer your data to affiliates, service providers, or other entities involved in fulfilling our contractual obligations or providing services on our behalf. These transfers may involve transmitting your data to countries outside the European Economic Area (EEA) or the United Kingdom that may have different data protection laws. However, we will only transfer your personal data to such countries if adequate safeguards are in place to protect your privacy rights, such as standard contractual clauses approved by the European Commission or other authorised mechanisms such as adequacy decisions.

7. DATA SECURITY

The security of your Personal Data is important to us, but please be aware that no method of transmission over the Internet, or method of electronic storage is 100% secure.

While we strive to use commercially reasonable efforts to protect your Personal Data, we cannot guarantee its absolute security.

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

We will protect all personal data using appropriate technical and organisational security measures, to safeguard its integrity and confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



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8. DATA RETENTION

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for. The relevant data retention periods are set out below. To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. Our retention periods are as follows:

A retention period for Personal Data commences once the Personal Data ceases to be 'live' e.g. a contract ends.

Liability Records	12 Years
Underwriting Records with an Employers Liability Element	60 Years
Other General Insurance Records	7 Years
Complaints Records (Complaints Files)	5 Years following resolution
Complaints Records (MI and Root Cause Data)	10 Years following resolution
Claims Records (Claims Files)	5 Years following full and final settlement
Claims Records (Claims records and Bordereaux)	10 Years following full and final settlement
Client Records	10 Years
Accounting Records	10 Years
Audit Records 10 Years	10 Years

We will securely return all information to the data controller, joint controller or destroy it when it is no longer required. This ensures compliance with the Data Protection laws and the duty of confidentiality we owe to our employees, clients and customers.



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9. YOUR LEGAL RIGHTS

You have certain rights under data protection laws in relation to your Personal Data as follows:

- Request access to your Personal Data.
- Request correction of your Personal Data.
- Request erasure of your Personal Data.
- Object to processing of your Personal Data.
- Request restriction of processing your Personal Data.
- Request transfer of your Personal Data to another data controller.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us using the DPO details above. Not all of these rights are absolute (e.g. the right to erasure, right to object only apply in certain circumstances) – we will assess your request and acknowledge it promptly.

No Fee Usually Required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month (unless a different timescale applies under UK data protection law). Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



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11. Fraud Prevention

We may process your personal information using various crime prevention and anti-fraud tools, databases, and methodologies to protect you and our clients against fraud. In cases where we identify activities that raise legal concerns, we reserve the right to report such instances to the appropriate authorities. Your privacy is important to us, and we are committed to using your data responsibly and in compliance with UK law.

12. Automated Processing

We may employ automated processing to manage and enhance your experience when using specific services.

You have the right to request that your information be processed by a human instead of through automation. If you wish to exercise this right, please contact our DPO, and we will be happy to assist you.

13. MISCELLANEOUS

Links to Other Websites

Our Services may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Changes to this Privacy Policy

We may update our privacy policy from time to time. We will notify you of any changes by posting the new privacy policy on our website.

We will let you know via email and/or a prominent notice on our Services, prior to the change becoming effective and update the "Last updated" date at the top of this privacy policy.

You are advised to review this privacy policy periodically for any changes. Changes to this privacy policy are effective when they are posted on this page.



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Version Control

Version Number	Date Approved	Approved By	Brief Description
V 1	05/2023	MPL Executive Team	New policy creation
V 1.1	07/2024	MPL Executive Team	Update to DPO, disclosure and retention details
V 1.2	10/2024	MPL Executive Team	Update to fraud prevention and automated processing



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