



# Privacy Notices

*Last updated: December 2025*

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:

<b>Account</b>	means a unique account created for users to access our products and services
<b>Our product(s)</b>	any product provided by MPL which captures or stores personal and confidential information
<b>Cookies</b>	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. Please see our <a href="#">Cookie Policy</a> for more information about how we use cookies.
<b>Device</b>	any device that can access the Services such as a computer, a cell phone or a digital tablet;
<b>Personal Data</b>	any information that relates to an identified or identifiable living individual;
<b>Services</b>	the services provided by MPL and/or our Website;
<b>Service Provider</b>	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;
<b>Clients/Client Users</b>	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
<b>Usage Data</b>	refers to data collected automatically and generated by the use of the services;
<b>Website</b>	refers to MPL Claims' website, accessible at <a href="http://www.mplclaims.com">www.mplclaims.com</a>



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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:** [compliance@mplclaims.com](mailto:compliance@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](http://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
<b>Claimant / Defendant</b>	Personal and Special Category Data	Data processed by us, using our products or services for the purpose of insurance claims management.	Necessary for the performance of a contract  Legitimate Interest  Explicit consent
<b>All Client Users</b>	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.	Legitimate Interest  Defence of legal claims
<b>All Users</b>	Usage Data	To administer and protect our business, our products and Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, staff training and hosting of data)	Legitimate Interest



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## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the following parties for the purposes outlined in Section 4 of this Privacy Policy, where relevant, and in accordance with the legitimate interests we pursue:

- 1 **Service Providers** - We may share your Personal Data with our service providers to monitor and analyse the use of our services. These providers are contractually obligated to process your data in compliance with applicable data protection laws.
- 2 **Business Transfers** - In the event of a merger, sale of assets, financing, or acquisition of all or part of our business, we may share or transfer your Personal Data to the relevant parties involved in the transaction. We will ensure that any such transfer is done in accordance with GDPR requirements.
- 3 **Affiliates** - We may share your Personal Data with our affiliates, including our parent company (Ergo UK Specialty Ltd) and other entities under common control with us. We will require these affiliates to respect this Privacy Policy and to process your data in line with GDPR principles.
- 4 **Business Partners** - We may share your Personal Data with selected business partners and suppliers to offer specific products, services, or promotions to you. These partners will only use your data as necessary to provide the requested services.
- 5 **Other Users** - When you interact with other users in public areas of our services (e.g. forums, social media), your Personal Data may be visible to all users and could be shared publicly outside our services.
- 6 **With Your Consent** - We may share your Personal Data for specific purposes when we have obtained your explicit consent.
- 7 **Legal Requirements** - We may be required to disclose your Personal Data if required by law or in response to valid requests by public authorities (such as a court, police, government agency, or regulator).



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We may also disclose your Personal Data in good faith if we believe 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 our services;
- Protect the personal safety of users or the public;
- Protect against legal liability.

We require all third parties who process your Personal Data to respect its security and confidentiality and to treat it in compliance with applicable data protection laws. We do not permit third-party service providers to use your Personal Data for their own purposes. They may only process your data in accordance with our instructions, and we have contracts in place with them that ensure their obligations to protect your data.

## **6. INTERNATIONAL TRANSFERS**

Your Personal Data is primarily processed and stored within the United Kingdom. While it is unlikely that your data will be processed outside of the UK, there may be occasions where we transfer your data to affiliates, service providers, or other entities who assist us in fulfilling our contractual obligations or providing services on our behalf.

In such cases, if it becomes necessary to transfer your data to countries outside the United Kingdom or the European Economic Area (EEA), we will ensure that appropriate safeguards are in place to protect your privacy rights. This may include measures such as Standard Contractual Clauses (SCCs) or other legally authorised mechanisms to ensure compliance with applicable data protection laws.



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## 7. DATA SECURITY

We take the security of your Personal Data seriously. However, please note that while we implement strong security measures, no method of transmission over the Internet or electronic storage is completely secure. As such, we cannot guarantee the absolute security of your Personal Data.

We have implemented appropriate technical and organisational measures to prevent your Personal Data from being accidentally lost, misused, accessed without authorisation, altered, or disclosed. These measures are designed to protect the confidentiality, integrity, and availability of your data.

Access to your Personal Data is restricted to those employees, agents, contractors, and third parties who require it to perform their duties in relation to our business. They will only process your data in accordance with our instructions, and they are bound by confidentiality obligations.

In the event of a suspected data breach, we have established procedures to handle such incidents and will notify you and any relevant regulatory authorities, as required by law, if there is a breach that poses a risk to your rights and freedoms.



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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.*

<b>Liability Records</b>	12 Years
<b>Underwriting Records with an Employers Liability Element</b>	60 Years
<b>Other General Insurance Records</b>	7 Years
<b>Complaints Records (Complaints Files)</b>	7 Years following resolution
<b>Complaints Records (MI and Root Cause Data)</b>	7 Years following resolution
<b>Claims Records (Claims Files)</b>	7 Years following full and final settlement
<b>Claims Records (Claims records and Bordereaux)</b>	7 Years following full and final settlement
<b>Client Records</b>	7 Years
<b>Accounting Records</b>	10 Years
<b>Audit Records 10 Years</b>	7 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 use automated processing to manage and enhance your experience with our services. This includes:

- Automated decision-making related to insurance claims outcomes, where we may automatically assess claims based on predefined criteria.
- Managing your information to ensure we can efficiently deliver our services, including personalisation and data analysis to improve service delivery.
- Automatic outreach and customer engagement, where we may use automation for communication, reminders, and other customer-related interactions.

Please note that while these processes are designed to improve efficiency and service quality, you have the right to request human intervention if you do not wish your data to be processed through automation. If you would like to exercise this right or have any concerns about the automated decision-making processes, please contact our Data Protection Officer ([DPO](#)), and we will be happy to assist you.

## **13. MISCELLANEOUS**

### **Links to Other Websites**

Our services may contain links to websites operated by third parties. If you click on a third-party link, you will be redirected to that third party's site. We strongly recommend that you review the privacy policy of any website you visit, as their practices may differ from ours.

We do not control and are not responsible for the content, privacy policies, or practices of third-party websites or services. We encourage you to exercise caution and make informed decisions when interacting with external sites.



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#### **14. 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**

<b>Version Number</b>	<b>Date Approved</b>	<b>Approved By</b>	<b>Brief Description</b>
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
V 1.3	12/2025	MPL Executive Team	Full document update



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