

**First Call GB Ltd**  
**Data Protection and Customer Privacy Policy**  
**Version Update: May 2018**

**Who We Are**

We are First Call (GB) Ltd, a company providing Motor Breakdown Membership, Cover and Services.

Our Registered Office is Wellington House, 90-92 Butt Road, Colchester, Essex, CO3 3DA.

Our Company Registration Number is 4494431.

This Data Protection and Customer Privacy Policy is exclusive to First Call (GB) Ltd and does not relate or bind to any of our partners who will operate their own policies.

**How We Collect Your Data**

We collect your Data when you purchase Motor Breakdown Cover Membership with us. The way we collect your Data depends on how you purchased your cover.

If you purchased cover with us directly, either over the phone or through our website, then you will have submitted your Data to us either by answering our questions or by completing an online form. If you have renewed your cover then you will confirm whether the details that we already have for you are correct and current.

If you have purchased your cover through a Broker, received your cover with Insurance or Warranty, or purchased cover in any other way than through purchasing cover with us directly, then First Call (GB) Ltd will be forwarded your details securely by the Organisation from which you have purchased the cover. Whilst we specify the Data we require to process your application for cover, this process is determined by the Organisation, and their own Data Protection and Customer Privacy Policy will also apply.

**Website Cookies and Analytics**

Our website [www.firstcallmotorbreakdown.co.uk](http://www.firstcallmotorbreakdown.co.uk) uses Cookies to determine if you are a new or returning visitor. This allows the website to determine if you are required to register as a new user on checkout or log in as a returning customer. These cookies are essential to the correct running of the website. You can find out more about managing and disabling cookies at [www.aboutcookies.org](http://www.aboutcookies.org).

Our website also uses Google Analytics tracking to allow us to know how you reached our website, for example from a direct link in an email or through the use of a search engine, and what pages you visit on our website. No information is collected that can identify you as an individual.

**What Data We Collect**

The Data that we collect is necessary to provide you with the Motor Breakdown Cover service that you have purchased from us. The nature of the Data we require is:

- Your Contact Information – Name, Address, Telephone Number, Email etc.
- Your Vehicle Information – Make, Model, Registration, Fuel Type, Transmission etc.
- Your Payment Information – Credit/Debit Card Details etc.

This information is collected at the time you purchase cover and is required to process your application and provide you with your Membership Documentation. Additional information of the same nature may be required during the course of providing Breakdown Assistance under the Membership that you have purchased.

**How We Use Your Data**

We use the Data that we collect for different reasons during the duration of the cover you purchase.

- We use your Contact information in the first instance to send your policy documentation to you. We also may need to contact you if we have a problem processing your application, or to send your documents to you. We might need to contact you following any assistance that we have provided under the cover that you hold with us. We will subsequently contact you regarding renewing your cover as it reaches its expiry. In each instance we will use the most appropriate method to contact you and depending on the circumstances multiple methods may be used. Your Contact information is stored securely and on-site by us.

- We use your Vehicle information to determine whether we can cover said vehicle on risk under the Motor Breakdown products that we offer, and to determine which specific products that we would be able to cover your vehicle under, as different products have different eligibility requirements for cover. We will also use this vehicle information should you require assistance under the Motor Breakdown Cover you hold with us in order to determine the best course of assistance to provide. Your Vehicle information is stored securely and on-site by us.
- Your payment information is required upon taking out Cover with us initially. If you purchase or renew your cover directly with us over the phone, then we will take your payment details. These details are not stored and are destroyed once payment has been taken successfully.
- If you have purchased or renewed your cover through our website [www.firstcallmotorbreakdown.co.uk](http://www.firstcallmotorbreakdown.co.uk) then your Payment details will have been processed by our online payment processor WorldPay. These details are not stored by WorldPay for future use and are not passed to us at any time.
- If you have purchased or renewed your cover with a Broker, Warranty Company, Insurance Company, or any other Third Party then they will be responsible for taking, storing and destroying your Payment details. These details are not shared with us at any time. We have no control and take no responsibility for how these Payment details are taken, used and destroyed, and you would need to refer to the company through which you have purchased cover to obtain this information.
- We may require Payment details at a later date when we provide assistance to you under the Cover that you hold with us. These details may be required if said assistance is not covered, or may not be covered, under the Cover that you hold with us. These details are not stored and are destroyed once payment has been taken.

#### **When We Share Your Data**

If you have purchased or renewed your cover with a Broker, Warranty Company, Insurance Company, or any other Third Party then they will have a copy of your Data before forwarding the details to us. We have no control and take no responsibility for how these details are taken, used and destroyed, and you would need to refer to the company through which you have purchased cover to obtain this information. Depending on the circumstances we may need to confirm or validate the Data that we hold about you with the Company through which you originally purchased the cover.

We may need to share your Contact Information and your Vehicle Information with a Third Party Recovery Operator in order to provide you with Breakdown Assistance under the Cover that you hold with us. This information can include (but depending on the circumstances of the breakdown is not restricted to):

- Your Name
- A Contact Telephone Number for you
- Your Vehicle Details
- Your Home Address (only if this location is either the site where assistance is required or if it is the destination to which your vehicle is being required)

This information is provided solely for the purpose of providing you with the Assistance to which you are entitled under the Cover that you hold with us. We are unable to provide you with Assistance unless we share this necessary information.

Your Data is not shared with any other company or organisation that is not involved either with the Administration of the Cover that you hold with us or for the provision of Breakdown Assistance under the Cover that you hold with us. First Call (GB) Ltd does not share your Data with any other Company, Organisation or unrelated Third Party Companies for the purposes of Sales or Marketing.

#### **Data Security and Storage**

All the information that is stored by us is done so securely and On Site at our Registered Office. Only First Call (GB) Ltd employees can access your Data and do so solely for the Administration and Operation of your Cover with us.

#### **Payment Processing and Destruction**

Any Credit or Debit card payment taken directly by First Call (GB) Ltd will be for one of the following reasons:

- Purchase of Motor Breakdown Cover
- Payment of an Administration Fee regarding your Cover
- Payment for Assistance that is not covered under the Cover you hold with us.

These details are stored only until Payment is taken successfully, and are then completely destroyed both electronically and physically once the Payment has been successfully taken. We do not store Payment Details in any form for repeat or recurring payments for customer security.

### **Accessing Your Data**

At any time you can contact us to request a copy of all the Data that we currently hold for you. This can be done whether you are a current or previous customer of ours.

To action this request, you will need to send us your request in writing to the following address:

Data Control, First Call GB Ltd, Wellington House, 90-92 Butt Road, Colchester, CO3 3DA  
This information will then be provided to you in an accessible format within 28 days of receipt of your request.

### **Requesting Contact Removal**

If you are a previous customer of ours with Cover that has now expired, you can request that your contact information in the form of Telephone Numbers and Email Addresses is deleted completely from our Database, and that we do not contact you by Post to your Home Address. This will mean that we will not contact you in any way in the future regarding renewal of your cover. In addition, if we have not provided Breakdown Assistance that has involved your Home Address (either as the site where Assistance was provided or as the Destination to which we have recovered your vehicle) then you can also request for your Home Address information be deleted from our Database as well.

To action this request you can contact us through either of the following methods:

Tel: 0800 389 5150      Email: [enquiries@firstcallmotorbreakdown.co.uk](mailto:enquiries@firstcallmotorbreakdown.co.uk)

This action will be completed within 24 hours of receipt of your request. Please state in your request if you require acknowledgement of your request or confirmation of the completion of your request prior to the deletion of your Data.

Please note that we will be unable to complete such a request if we still hold a purpose for the use of this information. This can include if we have requested but not yet received documentation from you relating to a breakdown for which we have provided assistance, or if money is owed by you to First Call (GB) Ltd for any reason.

### **Requesting Data Removal**

If you are a previous customer of ours with Cover that has now expired, and you have completed a Data Request as detailed above in the section "Accessing Your Data" and received a copy of the Data that we hold on you, then you may formally request that we delete any and all Data that we hold on you.

This will include your Application for Cover in any form taken (be it Telephone Call or Website Application) if it was completed through our website [www.firstcallmotorbreakdown.co.uk](http://www.firstcallmotorbreakdown.co.uk).

If you purchased your Cover through a Broker, Warranty Company, Insurance Company or any other Third Party then you will also need to contact them to delete any and all Data that they hold about you under their Data Protection policy as this is not within the scope of control or responsibility of First Call (GB) Ltd.

Please note that we will be unable to complete such a request if we still hold a purpose for the use of this information. This can include if we have requested but not yet received documentation from you relating to a breakdown for which we have provided assistance, or if money is owed by you to First Call (GB) Ltd for any reason.

If the above is not applicable then we will be able to delete all the information on your Policy Record as per your request. However, we will be unable to delete some information which may have relevant interest to us in the future – specifically if you have experienced a breakdown under the Cover that you held with us for which we have provided assistance. We will be able to delete all information from any Claim Record that is identifiable to you – specifically your Name and Contact Telephone Number. We will however still require your Vehicle Information as it forms the basis of the Claim for which we have provided assistance and is required for Data Validation with the Breakdown Assistance Partner that assisted you (if applicable). We will also require the Location of the Breakdown and the Recovery

Destination (if applicable) and either of these addresses may be your current or previous home address. However, we will delete any reference to any such address being your Current or Previous Home Address if it has been previously noted. Therefore whilst these details will still be held on our Database they will be unable to be used to identify or contact you in any way, and will purely be used for our internal Administration, Analytical and Accountancy purposes.

To action this request, you will need to send us your request in writing to the following address:

Data Control, First Call GB Ltd, Wellington House, 90-92 Butt Road, Colchester, CO3 3DA  
This action will be completed within 7 days of receipt of your request. Please state in your request if you require acknowledgement of your request or confirmation of the completion or your request prior to the deletion of your Data.

#### **Further Information, Questions and Complaints**

If you require any further information or have any questions regarding the collection, storage, usage, sharing or deletion of your Data, or if you believe your Data has been misused in any way and would like to make an official complaint, please write to us at the following dedicated address:

Data Control, First Call GB Ltd, Wellington House, 90-92 Butt Road, Colchester, CO3 3DA  
We will acknowledge receipt of your correspondence and we will provide a full response to your enquiry within 28 days of receipt of your correspondence.

If after receiving our response you are not satisfied in the way we have dealt with your concerns, you have the right to complain to the Information Commissioner's Office.

You can reach them through the following methods:

Website: <https://ico.org.uk>

Tel: 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

#### **Version Note**

This version of our Data Protection and Customer Privacy Policy is valid from May 2018. This can be updated at any time – please visit our website for our current policy at the following address:

<https://www.firstcallmotorbreakdown.co.uk/content/15/privacy-policy-and-gdpr>

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