How we protect your information

Bastion Insurance Services Ltd

Privacy Policy

About us

Bastion Insurance Services Ltd trade under brand names including Tinhat, Devicecover, Freshcover and The Oxford Claims Company. We provide insurance and associated services to our customers, often working with other insurance companies to provide you with your insurance policy.

We are committed to protecting your privacy and take great care to ensure your information is kept safe and secure. This policy explains how we will collect, store, use and share your personal information in compliance with the General Data Protection Regulation (GDPR).

Who do we collect information about?

We collect information about the following types of individuals:

- Previous, current and prospective customers/policyholders
- Person's authorised to speak to us on behalf of a customer or policy holder
- Experts instructed in relation to claims
- Users of websites owned by Bastion Insurance Services Ltd
- Business Partners

When do we collect information about you?

We collect information about you when:

- When we are providing you with a quotation when you apply for, amend or renew a policy
- You submit a claim under a policy
- When you contact us (by phone, email, through our website or otherwise) such as to update
- or check your details, provide feedback, fill in forms or complete applications for insurance policies or other goods/services
- When you register to use our website, subscribe to our services, search for a product, place an order on our website, participate in discussion boards or other social media functions on our website, leave any query or correspondence on our website, enter a competition, promotion or survey or when you report a problem with our website or any other activity undertaken with us.
- When you contact us to make a claim or a complaint.

What information do we collect about you?

The personal information that we collect about you will depend on your relationship with us.

If you provide personal information to us about other individuals you agree: (a) to inform the individual about the content of this Privacy Policy; and (b) to obtain any consent where we indicate that it is required for the processing of that individual's personal data in accordance with this Privacy Policy.

Below is a detailed list of the types of personal information we may collect and use about you:

- General information such as your name, address, date of birth, email address and phone
- number
- Details of previous policies or quotes between you and us.
- Financial information such as payment card or bank account information and information which is pertinent the administration of the quote, policy or claim
- Personal description when necessary for the administration of the policy
- Details about you and your personal circumstances where this is appropriate in the administration of your quote, policy or claim for example, information to allow us to identify a potentially vulnerable customer, to record your marital status, occupation, home owner status, as well as other information you (or a third party) may provide to us as part of the quote, policy and/or claim administration processes whether through phone, email, letter, or via a website, App, social media or online chat.
- Location at time of policy purchase
- Information relevant to the scope of the quote or policy such as gadget or bicycle type.
- We may collect information when you use our website including data that allows us to monitor your preferences and how you use our website. This helps us to organise our website content in order to improve your experience. The information we collect includes:
    - Details of transactions you carry out through our website.
    - Information that you provide by filling in forms on our website even if those forms are not submitted.
    - Technical information, including the Internet Protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time).
- Products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- We may use cookies to collect information about how our website is used. Please see our Cookies Policy for more information about our use of cookies.

How do we collect your information?

We collect personal information in a number of ways, as detailed below:

- Directly from you or from someone else on your behalf by website, phone, email, on line chat and paper documents.
- From your company website.
- From our records.

- From third parties (including brokers, aggregators, insurance companies, business partners,
- suppliers, payment and delivery services, third party claimants under a policy, advertising
- networks, analytics providers, search information providers and credit reference agencies).
- From other resources, for example, risk assessment models, pricing data, statistics and other information from public databases, websites and other sources, including aggregator websites.
- Other publicly available sources, including, but not limited to, Google Earth and social media.
- Through customer and broker surveys.
- Via insurance industry fraud prevention and detection databases, as well as sanctions
- screening tools.
- From government agencies such as HMRC and from professional regulators.

What are the purposes for which information about you is used?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing. When the information that we process is classed as special category or sensitive personal information, we must have an additional legal ground for such processing.

Whether you provide us with the information, or we collect information from you or we are provided with information from other sources, we may use this information:

a) To evaluate your insurance application and provide (and follow up) a quote

Legal grounds:

Our having an appropriate business need to use your information to provide insurance, which does not overly prejudice you.

Our providing your insurance contract.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or because you have provided us with your explicit consent.

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b) To set you up as a policyholder including carrying out fraud, credit and anti-money laundering checks

Legal grounds:

To carry out our obligations arising from any insurance contract entered into between you and us.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts.

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c) To evaluate your application and ability to pay for your policy by instalments (if applicable)

Legal grounds:

Such use is necessary in order to provide your insurance policy.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

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d) To provide and manage your insurance policy

Legal grounds:

Our having an appropriate business need to use your information to provide insurance which does not overly prejudice you.

Our providing your insurance contract.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

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e) To provide and manage your claim (whether we are your insurers, we are acting for your insurer or whether you are a third party making a claim against us or a third-party insurer for whom we act)

Legal grounds:

Our having an appropriate business need to use your information to manage an insurance contract and claim which does not overly prejudice you.

Our providing an insurance contract.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

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f) Communicating with you and resolving any complaints that you might have

Legal grounds:

Our providing your insurance contract.

Our having an appropriate business need to use your information to manage and respond to complaints which does not overly prejudice you.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

The use is necessary in order for us to establish, exercise or defend our legal rights.

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g) To transfer to third parties for the purpose of providing you with the services required under the insurance contract or other services which you have elected to receive from us in connection with the insurance contract

Legal grounds:

Our providing the insurance contract.

Our providing other contracted services.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

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h) To transfer to third parties where you have elected to enter into a contract with that third party for separate services

Legal grounds:

You have provided your explicit consent to allow us to provide the third party with your details to enable you to enter into a contract with that third party.

Additional legal ground for sensitive personal information:

You have provided your explicit consent to the provision of these additional services which necessitate the transfer of sensitive personal information.

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i) Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers

Legal grounds:

Our providing your insurance contract.

Our having an appropriate business need to use your information to ensure fraud is detected which does not overly prejudice you.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts.

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j) Complying with our legal or regulatory obligations

Legal grounds:

The use is necessary in order for us to comply with our legal obligations.

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

The use is necessary in order for us to establish, exercise or defend our legal rights.

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k) Recover outstanding payments

Legal grounds:

Our having an appropriate business need to use your information in order to recover debts which does not overly prejudice you.

Additional legal ground for sensitive personal information:

The use is necessary in order for us to establish, exercise or defend our legal rights.

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l) To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you, including news updates and details of special offers (further details are provided in the 'Marketing' section below)

Legal grounds:

You have provided your explicit consent which can be withdrawn at any time.

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m) To improve our customer service

Legal grounds:

Our having an appropriate business need to use your information in the improvement of our customer service which does not overly prejudice you.

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n) To measure the effectiveness of our advertising

Legal grounds:

Our having an appropriate business need to use your information to ensure our advertising is effective which does not overly prejudice you.

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o) To provide data analysis in order to assist us with the pricing of our products and detect market trends

Legal grounds:

Our having an appropriate business need to use your information which does not overly prejudice you.

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p) To personalise your repeat visits to our website and to improve our website, including as part of our efforts to keep our website safe and secure

Legal grounds:

Our having an appropriate business need to use your information which does not overly prejudice you.

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q) To notify you about changes to our services or products

Legal grounds:

Our having an appropriate business need to use your information to keep our customers up to date with changes to our products or services which does not overly prejudice you.

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r) To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes

Legal grounds:

Our having an appropriate business need to use your information to maintain our websites which does not overly prejudice you.

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s) To allow you to participate in interactive features of our services/website

Legal grounds:

Our having an appropriate business need to use your information to offer an interactive website for customers which does not overly prejudice you.

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t) For analytical purposes and to improve our products and services. Where possible we will anonymise such information

Legal grounds:

We have a legitimate business need to use your personal information for services improvement.

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u) Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics

Legal grounds:

We have a legitimate business need to provide secure and quality services

Additional legal ground for sensitive personal information:

Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

Who do we share the information we collect about you with?

Sharing with third parties

We may share your information with selected third parties, in order to offer services to you or to perform any necessary functions on our behalf. This may include:

- Your relatives, executor or guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with you such as your insurance broker
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us and make changes on your behalf
- Our insurance partners such as brokers, other insurers, reinsurers or other companies who act as insurance distributors

- Other third parties who assist in the administration of insurance policies such as another insurance company if there has been an accident which requires a claim to or from that insurance company
- We may share the personal information of any persons named on the policy with third parties to obtain information which may be used by us to inform its risk selection, pricing and underwriting decisions
- Other third parties you have asked us to engage with
- Claims administrators
- Solicitors
    - To manage legal cases brought against us or on our behalf
    - To manage regulatory investigations
- Business partners
    - Software providers; who provide the technical infrastructure to allow us to provide your quote, policy and claims administration
    - Aggregators (when you have used their website to obtain our quote): to verify the policies obtained through their sites
    - Clients: for whom we provide insurance policy and administration
    - Companies you have agreed may receive your information to allow you to enter into a contract with them (for example, reward schemes or claims management companies)
- Suppliers
    - Companies engaged by us to provide contracted services. This is a wide ranging list of companies and their use will depend upon the circumstances. For example:
        - Printing of invoices and policy documents
        - To allow us to record our incoming and outgoing calls with you
        - In the event of a claim we may engage the services of gadget/device repair companies, bicycle mechanics
    - Companies engaged by us to provide aspects of our communications with you (for example, web hosting, online chat provider)
- Credit reference agencies
- Finance providers
- Survey companies
- Data analytics advisors
- Enquiry agents/Counter Fraud Investigators
- Debt collectors
- Query search engine operators
- Where you have given your explicit consent to third parties for marketing purposes

Disclosure of your personal information to a third party will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also share your information with:

- Search engine operators who can assist us in the improvement of our website
- Prospective buyers, in the event that we sell any business or assets

- Regulators and other authorised bodies, whenever we are required to do so by law We believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

We may also share your information with other insurance industry databases.

Claims checks

We may share your information with organisations that can check your claims history.

What is our approach to sending information overseas?

We may send your data outside the United Kingdom (UK) if we are required to do so for a joint data controller (for example if an insurer is based overseas).

We seek to ensure that data which is processed on our behalf as data controller is retained within the UK but this is sometimes difficult (for example a UK supplier may have a server based outside of the UK).

If we make a transfer of your personal information outside of the UK we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards.

How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfill the relevant purposes set out in this Privacy Policy and in order to comply with our contractual, legal and regulatory obligations.

We have implemented a Document Retention Policy which records of details how long various types of information should be retained. The Policy is reviewed on a regular basis to ensure that it aligns to current legal and regulatory requirements. The retention periods vary depending upon the circumstances of an individual matter but in general our retention periods for customer facing documentation can be set out as follows:

Quote information - 3 months (unless marketing consent received from you in which case 13 months)

Policy documents - 7 years from cancellation of policy

Claims documents - 7 years from date of last settlement/order

Complaints - 7 years from the complaint being resolved or the policy retention period whichever is the longer

If you would like further information regarding the periods for which your personal information will be stored, please see the contact details outlined in the "How to Contact Us" section below.

Automated decision making

Fraud prevention

We use computers to automatically run fraud and money-laundering checks which helps us to decide:

- Whether someone might pose a fraud or money-laundering risk
- Whether their behaviour is similar to that of known fraudsters or money launderers
- Is inconsistent with information we already have about them
- If we think they are hiding their true identity

Auto Renewal

We will ask you when you purchase your policy if you would like to opt in to auto-renewal. However, even if you opted in at this point, you have the right to opt out at any point.

What marketing activities do we carry out?

You are in control of whether we can use your personal information for marketing. We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving.

When we engage with you, we will ask you (on our website, by email or when we speak to you) whether you want us to contact you with marketing information that we think might interest you and if so by what method (email, phone, post, SMS). Depending on the options offered and that you select the marketing could be about:

- Our products and services,
- Products or and services from selected third parties.

We may send this information to you directly or via third parties such as search engine operators and marketing companies on our behalf. If you wish to unsubscribe from marketing then you may do so at any time by following the unsubscribe instructions that appear in all marketing communications. Otherwise in respect of marketing from us, you can always contact us using the details set out in your policy documentation to update your contact preferences or details. Although this will stop marketing communications we will of course continue to send you service related (non-marketing) communications where necessary.

Please note that there is no personal information used in our online ad campaigns so you will need to check your browser or social media settings to avoid seeing these.

Your rights

Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in the "How to Contact Us" section of this Privacy Policy.

Please note:

- In some cases we may not be able to comply with your request (e.g. we might not be able to delete your data) for reasons such as our own obligations to comply with contractual, legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.
- In some circumstances exercising some of these rights (including the right to erasure, the right to restriction of processing) will mean we are unable to continue providing you with cover under the policy and may therefore result in the cancellation of the policy. You will therefore lose the right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled. For some policies no refunds will be payable on cancellation, for other products a refund may be payable.

The right to access your personal information

You have the right to access a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and up to date. However, if you do not believe this is the case, you can ask us to update or amend it.

The right to erasure

In certain circumstances, you may ask us to erase your personal information.

The right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal information.

The right to data portability

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice.

The right to object to marketing

You can ask us to stop sending you marketing messages at any time.

The right not to be subject to automated decision-making (including profiling)

You have a right not to be subject to automated decision-making (as described above) and where automated decision-making is used in the assessment of your application or fraud prevention, you can contact us to request that any declined decision is reconsidered. If you want to opt out of automatic decision-making, let us know, although in some circumstances it may mean we can’t offer you a quote or policy as some automated decisions are necessary to provide your insurance policy.

The right to withdraw consent

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

The right to lodge a complaint with the ICO

You have a right to complain to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations.

More information can be found on the ICO's website at: www.ico.org.uk/concerns.

Making a complaint will not affect any other legal rights or remedies that you have.

How we protect your information

We want you to have confidence in how we use and hold your data. We know that to achieve this we must preserve the security and confidentiality of your personal information. We have therefore developed a range of organisational, procedural and technical security measures designed to protect your personal information from unauthorized use or disclosure. Examples of some of these measures include:

- User and privileged account management including appropriate policies for password complexity, length and history
- Auditing of system users and administrators
- Regular backup schedules and disaster recovery environment for key systems and services
- Secure file transfer methods are used to encrypt data
- Usage of data loss prevention tools within the Group
- Data breach detection: Security tools in place to detect unusual or abnormal activity
- Data breach investigation: Audit and logging tools used to investigate any potential or reported breaches
- Data breach response: A plan that pulls together our compliance, legal and IT security teams to ensure rapid assessment and mitigation of data breaches

Changes to our Privacy Policy

We keep our Privacy Policy under review and it is updated periodically. For example, those changes may be due to government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on: 16th Feb 2026.

How to Contact Us

Please contact us if you have any questions about our Privacy Policy or to exercise any of your rights:

Data Protection Officer
Bastion Insurance Services Ltd,
Temple Court Mews,
109 Oxford Road
Oxford
OX4 2ER

Or by email to dataprotection@bastioninsurance.co.uk.

Where you have made the request by electronic means, the information will be provided to you by electronic means where possible.

Other websites

Our website may contain links to other websites. This Privacy Policy only applies to our own website so when you link to other websites you should read their own privacy policies. If this policy conflicts with any written contract that we have with you then the written contract shall take precedence.

Complaints

If you have a complaint about how we use your information then please contact us at:

Data Protection Officer
Bastion Insurance Services Ltd,
Temple Court Mews,
109 Oxford Road
Oxford
OX4 2ER

You can also contact us by phone on 01865 818927, or by email using dataprotection@bastioninsurance.co.uk.

If you have a complaint about the way in which your data has been processed, you can contact the ICO at: www.ico.org.uk/concerns