



## **Our Privacy Notice**

This notice covers our requirement to provide information on how and why we use personal data and the rights under the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

## **Personal Information**

We will collect personal information relating to an individual (Data Subject) from other insurance market participants, credit reference agencies, anti-fraud databases, sanctions lists, court judgments and other judicial databases, government agencies such as the HMRC, open electoral register and any other publicly available data sources.

In addition, in the event of a claim, we will get information from third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers.

Personal Information denotes:

- Information provided to us by the completion of one of our proposal forms
- Information provided to us by the completion of an Insurance Broker's proposal form
- Information that may be provided to us with over the telephone, via email or face to face by an Insurance Broker

## **The Data Protection Principals**

As we are responsible for gathering and using personal information, we have to follow strict rules called the data protection principles. As such, we must make sure that any personal information we gather or hold is:

- ✓ Used fairly and lawfully in a transparent manner
- ✓ Used for explicit and legitimate grounds only
- ✓ Used in a way that is adequate, relevant and not excessive
- ✓ Accurate and kept up to date
- ✓ Kept for no longer than is absolutely necessary
- ✓ Handled according to a Data Subject's rights
- ✓ Kept safe and secure
- ✓ Not transferred outside the [European Economic Area](#) without adequate protection

## **Why We Gather Personal Information**

Prosure Solutions Limited provides a range of insurance products. We process data provided to us about a Data Subject, or obtained from other sources in order to deliver the appropriate products and services.

The reasons for processing your data is mainly to:

- ✓ Provide a quotation for insurance
- ✓ Arrange and administer a policy

We do not collect more information than we need to meet our obligations and will not retain it for longer than is necessary.

Some of the personal information we ask for may be sensitive (special category data). We are allowed by legislation to collect such information for insurance purposes without specific consent but it will only be used for the purposes we have set out above.

We will only ever use personal information for the purpose of providing insurance quotes, progressing an application for insurance, administering an insurance policy, handling claims, or fulfilling our legal or regulatory requirements such as fraud prevention, help preventing financial crime and audit purposes.

### Legal Basis For Processing Personal Information

We are required to have a lawful basis in order to process your personal data and the relevant bases which apply:

Purpose of Processing	Lawful Basis
Providing quotations, arranging and administering insurance policies, claims handling	Necessary for the Performance of a Contract. The processing is necessary for a contract we already have in place, or because we have been asked to take specific steps before entering into a contract.
Provision of information on products and services	Our legitimate interests
To notify changes to our service	Our legal and regulatory obligations
To prevent and detect fraud, money laundering and other financial crimes	Our legal and regulatory obligations
To meet general legal or regulatory obligations	Our legal and regulatory obligations

### Who Do We Share Details With and Why

To meet our regulatory obligations we may therefore need to share personal information with product and service providers, re-insurers, insurance industry databases, regulatory authorities, the Police and other law enforcement bodies.

### Data Retention

The type of insurance we arrange dictates the amount of time we retain personal information for. For the majority of insurance products, we retain records for a period of 7 years after the insurance contract expires. For insurance which includes Employers Liability then we retain records indefinitely and for other liability related insurance products, we retain records for a period of 12 years after the insurance contract with us expires.

### Security

We are committed to protecting the security and privacy of all personal information which we obtain and hold about Data Subjects.

We employ appropriate technical security measures to protect personal information and ensure that it is not accessed by unauthorised persons. Information is stored on secure computers, in a locked information centre, and information is encrypted wherever possible.

### Where Information Is Stored

Information which we receive is stored on a computer located in the European Economic Area (EEA). In addition, if you use our Services while you are outside the EEA, this information may be transferred outside the EEA in order to provide you with those Services.

### **If We Are Sent An Email**

Any email that is sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email sent to us is within the bounds of the law.

### **If We Receive A Complaint**

If we receive a complaint, we make up a file containing the details of the complaint. The file is likely to contain the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to investigate and process the complaint.

We usually have to disclose the complainant's identity to whomever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We also usually have to disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer.

We may also be required to provide a copy of the file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint.

We are required to disclose high-level analytics to the Financial Conduct Authority (FCA) concerning the number and nature of any complaints we receive. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 3 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

### **Use of Data Processors**

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with a Data Subject's personal information unless we have instructed them to do it. They will not share personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

### **Individual Data Subject Rights**

Data Subjects have rights which they can exercise in relation to the information we hold about them.

Please ask us for an explanation of each should you wish to have more information:

- ✓ The right to be informed
- ✓ The right of access
- ✓ The right to rectification
- ✓ The right to erasure
- ✓ The right to restrict processing
- ✓ The right to portability
- ✓ The right to object
- ✓ Rights to automated decision and profiling

## **Right To Access**

Data Subjects have the right to access any information we hold about them, and the right to know why that data is being processed, how long it's stored for, and who has had or has access to it.

We will not charge for supplying this information however we do reserve the right to apply a reasonable fee where requests are deemed excessive.

We will respond to any such request within the maximum time frame allowed of one month.

## **How To Contact Us**

For further information on how personal information is used, how we maintain the security of that information and the rights a data subject has to access the information we hold or if you would like to make a complaint, you can write to us, email us, or call us as follows:

Andrew Lucia  
Prosure Solutions Limited  
150 Minorities,  
London, EC3N 1LS

Tel: 0203 150 1941

## **If You Have A Complaint**

If you have any concerns about our practices in relation to data protection, please contact us directly using the details provided above. We will aim to respond to your concerns and will also endeavour to put right anything that's gone wrong.

If you are still dissatisfied after contacting us, you may report your concern to the Information Commissioner's Office by contacting them as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)

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