Premier Insurance Brokers Ltd

DATA PRIVACY NOTICE

We take your privacy very seriously and *we* ask that you read this privacy notice carefully as it contains important information on who *we* are, how and why *we* collect, store, use and share personal data, your rights in relation to your personal data and on how to contact *us* and supervisory authorities in the event you have a complaint.

Italicised words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

Who we are

Premier Insurance Brokers Ltd collects, uses and is responsible for certain personal data about you. When *we* do so *we* are required to comply with *data protection regulation* and *we* are responsible as a *data controller* of that personal data for the purposes of those laws.

Premier Insurance Brokers Ltd is a company registered in England and Wales company number 8430341 whose registered office is at 9 Farrington Way, Eastwood, Nottingham, NG16 3BF. Premier Insurance Brokers Ltd is authorised and regulated by the Financial Conduct Authority. Financial Services Register number is 603619.

We only offer products from a limited number of insurers for Residential Buildings and Contents insurance &/or Buy to Let Buildings and Contents policies.

The personal data we collect and use

In the course of providing our service to you *we* may collect the following personal data when you provide it to *us*:

- *Identity information*
- *Employment status*
- *Occupation*
- *Date of birth*
- *Marital status*
- *Dependants*
- *Contact information*
- Details of your dependents and/or beneficiaries under a policy **(If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to *us*. You might find it helpful to show them this privacy notice and if they have any concerns please contact *us* in one of the ways described below.)**

Information collected from other sources

We also obtain personal data from other sources in the course of providing our *intermediary services*. Where *we* obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with *us* and, where necessary, ask permission before sharing information with *us*.

The personal data *we* obtain from other sources may include the following:

- From *lenders* and/or *product providers*:
  - *product* details

How we use your personal data

The below table sets out:

- how *we* use your personal data
- the lawful bases upon which *we* collect and use your personal data
- who *we* routinely share your personal data with

Reason for Processing	***Lawful Basis for Processing***	***Third party recipients linked to that activity***
• To apply for or quotations for Property Insurance and Accident Sickness & Unemployment products on your behalf	Contract	Product Providers
• To retain records of any services provided to you by us in order to defend a potential legal claim or complaints	Legitimate Interests	External suppliers of data storage and data hosting services to retain records on our behalf, regulators & legal representatives
• To provide you with details of products and services from us and third parties that may be of interest to you in order with your preference	Consent	Product Providers

Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- Criminal conviction or offence information for the purpose of arranging an insurance contract in relation to general insurance product.

In addition to the lawful basis for processing this information set out in the above table, *we* will be processing it for the purpose of (i) arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, *we* may process criminal conviction or offence information. Where *we* do so, in addition to the lawful basis for processing this information set out in the above table, *we* will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

Marketing

We may use personal data we hold about you to help *us* identify, tailor and provide you with details of products and services from *us* that may be of interest to you. *We* will only do so where we have obtained your consent and then have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to *us*.

In addition, where you provided your consent, *we* may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: 01773 535521

By email: Kirsty@premierinsurancebrokersltd.co.uk

By Post: 9 Farrington Way, Eastwood, Nottingham, NG16 3BF.

Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if *we* ask for your consent to process it. In all other cases you must provide your personal data in order for *us* to provide you with *intermediary services*.

How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

Type of Record	Retention Period
All data as set out in the personal data we collect section	**Retention in case of queries**- We'll retain your personal data as long as necessary to deal with your queries **Retention in case of claims-** We'll retain your personal data for as long as you might legally bring claims against us **Retention in accordance with legal and regulatory requirements-** We'll retain your personal data based on our legal and regulatory requirements

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how *we* use personal data
- To object to how *we* use personal data
- To ask *us* to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how *we* use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. *We* do this to ensure *we* only disclose information or change your details where *we* know *we* are dealing with the right individual.

We will not ask for a fee, unless *we* think your request is unfounded, repetitive or excessive. Where a fee is necessary, *we* will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. *We* will always let you know if *we* think a response will take longer than one month. To speed up *our* response, *we* may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality *we* owe to others, or if *we* are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask *us* to confirm whether or not *we* have and are using your personal data. You can also ask to get a copy of your personal data from *us* and for information on how *we* process it.

To rectify / erase personal data

You can ask that *we* rectify any information about you which is incorrect. *We* will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that *we* erase your personal data if you think *we* no longer need to use it for the purpose *we* collected it from you.

You can also ask that *we* erase your personal data if you have either withdrawn your consent to *us* using your information (if *we* originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where *we* have used it unlawfully or where *we* are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where *we* need to keep using your personal data in order to comply with *our* legal obligation or where *we* need to

use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that *we* restrict *our* use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and *we* need to verify it;
- where *our* use of your personal data is not lawful but you do not want *us* to erase it;
- where the information is no longer required for the purposes for which it was collected but *we* need it to establish, exercise or defend legal claims; or
- where you have objected to *our* use of your personal data but *we* still need to verify if *we* have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where *we* have your consent to use it; or *we* need to use it to establish, exercise or defend legal claims, or *we* need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which *we* have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh *our* legitimate interest in using the information. If you raise an objection, *we* may continue to use the personal data if *we* can demonstrate that *we* have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask *us* to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where *we* use your personal data in order to perform a contract with you, or where *we* asked for your consent to use your personal data. This right does not apply to any personal data which *we* hold or process outside automated means.

To contest decisions based on automatic decision making

If *we* made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by *us* produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where *we* are authorised by law to make such decisions and have adopted suitable safeguards in *our* decision making processes to protect your rights and freedoms.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask *us* about what personal data *we* have about you, what *we* use your information for, who *we* disclose your information to, whether *we* transfer it abroad, how *we* protect it, how long *we* keep it for, what rights you have, how you can make a complaint, where *we* got your data from and whether *we* have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- write to Steve Morley, 9 Farrington Way, Eastwood, Nottingham, NG16 3BF.
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. *We* limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. *We* will notify you and any applicable regulator of a suspected data security breach where *we* are legally required to do so.

Our supervisory authority

If you are not happy with the way *we* are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

If you have any questions about this privacy notice or the information *we* hold about you please contact:-

Steve Morley, Premier Insurance Brokers Ltd, 9 Farrington Way, Eastwood, Nottingham, NG16 3BF.

Glossary of Terms

we, **us** or **our**	Premier Insurance Brokers Ltd a company registered in England and Wales company number 8430341 and having its registered office at 9 Farrington Way, Eastwood, Nottingham, NG16 3BF.
contact information	these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address
data controller	means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, *we* are your data controller as *we* determine how *we* will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of *us* providing you with *intermediary services*
data protection regulation	applicable data privacy and protection laws
employment status	this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance
FCA	the Financial Conduct Authority, being the independent watchdog that regulates financial services
financial information	this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60
identity information	this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number
intermediary services	these are the services we provide to you in relation to the products, which may include: • Property Insurance & Accident, sickness & Unemployment products
lifestyle information	this includes both work and leisure behaviour patterns. Most relevant to your *products* may be your smoker status, alcohol consumption, health, retirement age and exercise habits
product	this is a general insurance product respect of which we provide *intermediary services* to you
product provider	a company which provides investment, pension, protection and/or general insurance products (for a list of product providers which *we* work with, please contact *us* – see *How to contact us* above)
vulnerability	a vulnerable consumer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when an advisory firm is not acting with appropriate levels of care. These customers are more likely to suffer severe detriment if something goes wrong. Details of vulnerability fall in to the following categories: health; resilience (financial); life events; and capability (financial knowledge/ confidence)