

Julie Price and Co Ltd Privacy Policy May 2018

We have always taken care to protect your data. Here's how we handle your information.

Who we are

We are Julie Price and Co Ltd General Insurance Brokers, registered address 48 Rugby Road, Hinckley, Leics, authorised and regulated by the Financial Conduct Authority.

Legal Basis and purpose for processing your personal data

This Privacy Policy aims to give you information on how we collect and use your personal data. To process your data we must have a lawful basis to do so, As insurance brokers we will process your personal data where:

- You have given consent to the processing of your personal data for one or more specific purposes ie the advising, quoting and arranging contracts of insurance and their continuing service.
- Where the information given is necessary prior and during the quotation and contract process to comply with your request for cover.
- Where it is necessary in order to protect your vital interests;
- It is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- it is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

Commitment to protecting your personal information and respecting your privacy.

We commit to protecting your personal information and data when we have dealings with you. This may include:

- Calling into the office or corresponding with us using services such as telephone, email or written letter.
- Viewing our website.
- Applying for a job vacancy.

We do not use your information for marketing to others, but to get the advised or requested covers to quotation and contract level.

Summary of how we use your personal data:

Provide you with quotations or contracts to cover your property eg motor, household, person eg travel or liabilities eg personal or public. To do this we use in house software and portals to insurers for quotes, claims and servicing as well as emails and post to insurers and wholesaling brokers.

The information enables us to :

- carry out our obligations from any contracts you have entered into with us.
- Respond to your enquiries and complaints.
- If relevant to you notify you about changes to our services.
- Deal with job vacancy applications and CVs.

Our legitimate interests

There are times when we will rely on legitimate interests to process personal data, particularly when it is not practical to obtain consent. We will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Examples are:

- Reporting criminal acts and compliance with law enforcement agencies.
- Internal and external audit for financial or regulatory compliance purposes.
- Statutory reporting.
- Physical and network security.
- Financial management and control.
- General administration.

Telephone, counter post and email information we collect when you contact us via this method

When you ask for our services we will ask for all relevant information needed to complete the task.

- **Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** responding to enquiries and messages we receive and keeping records of correspondence.
- **Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

- **Email transfer and storage of your information:** We use a third party email provider to store emails you send us. Emails you send us will be stored within the European Economic Area on our third party email provider's servers.

We do not quote directly from our website which is for information and invites you to make contact with the office.

Other Information we collect when you visit our website:

- We collect(s) and store(s) server logs to ensure network and IT security and so that the server and website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber attacks, by detecting unusual or suspicious activity.
- We use the information collected by our website server logs to analyse how our website users interact with our website and its features.
- we have a legitimate interest in using your information for the purposes of ensuring network and information security.
- We have cookies on our website : cookies are data files which are sent from a website to a browser to record information about users for various purposes, however we do not actively use this information for marketing and rely on direct contact for quotations and contracts.

Information collected or obtained from third parties

This section sets out how we obtain or collect information about you from third parties.

- **Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **Reason why necessary to perform a contract:** where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).
- **Legal basis for processing:** consent (Article 6(1)(a) of the General Data Protection Regulation).
- **Consent:** where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.
- **Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interests:** where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.
- For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract. Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.
- **Where we receive information about you in error:** If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties

In certain circumstances (for example, to verify the information we hold about you or obtain missing information we require to provide you with a service) we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as Companies House, online customer databases, business directories, media publications, social media, and websites (including your own website if you have one). In certain circumstances we will also obtain information about you from private sources, both EU and non-EU.

- **Legal basis for processing:** necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **Reason why necessary to perform a contract:** where you have entered into a contract or requested that we enter into a contract with you, in certain circumstances, we will obtain information about you from public sources in order to enable us to understand your business and provide services to you or services to a sufficient standard. For example, we would obtain and/or verify your email address from your website or from a directory where you ask us to send you information by email but we do not possess the information or we need to confirm that we have recorded your email address correctly.
- **Legal Basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection General Data Protection Regulation).
- **Legitimate interests:** in certain circumstances, we will have a legitimate interest in obtaining information about you from public and private sources. For example, if you have infringed or we suspect that you have infringed any

of our legal rights, we will have a legitimate interest in obtaining and processing information about you from such sources in order to investigate and pursue any suspected or potential infringement.

- **Legal basis for processing:** consent (Article 6(1)(a) of the General Data Protection Regulation).
- **Consent:** we may obtain information from third parties, such as data brokers, where you have consented to them sharing information with us by [insert method by which individual consent.

Disclosure and additional uses of your information

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business. These include the following:

- Insurers and wholesaling brokers
- Telephone providers, email and IT providers including hosting, eg for transfer and storage of files

Our third-party service providers are located in the UK and also in the United States (Microsoft).

Your information will be shared with these service providers **ONLY WHERE NECESSARY** to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

We do not display the identities of our service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our service providers, however, please contact us and we will provide you with such information where you have a legitimate reason for requesting it (where we have shared your information with such service providers, for example).

- **Legal basis for processing:** legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest relied on:** where we share your information with these third parties in a context other than where is necessary to perform a contract (or take steps at your request to do so), we will share your information with such third parties in order to allow us to run and manage our business efficiently.
- **Legal basis for processing:** necessary to perform a contract and/or to take steps at your request prior to entering into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **Reason why necessary to perform a contract:** we may need to share information with our service providers to enable us to perform our obligations under that contract or to take the steps you have requested before we enter into a contract with you.

Disclosure of your information to other third parties

We disclose your information to Insurers and wholesaling brokers at quote, contracts and in the policy period eg claims. Other third parties in specific circumstances, as set out below.

- **Transfer and storage of your information.** Information collected by Microsoft is stored outside the European Economic Area in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.]
- **Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our accountants, advisors, business partners, independent contractors(claims), and insurers.** Further information on each of these third parties is set out below.
- **Legal basis for processing:** legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest:** running and managing our business efficiently.

Accountants and advisors

We share information with our accountants, lawyers and FCA consultants. For example, we share invoices we issue and receive with our accountants, claims details with lawyers and tradesmen and general compliance issues with the FCA consultant.

Insurers and claims - legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

- **Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** resolving disputes and potential disputes.

How long we retain your information

There are several factors we need to consider and relevant industry practice and requirements for certain records eg payments and what the inland revenue requires and what's reasonable.

Summary of criteria for determining retention periods

- In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:
- [the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).

How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;
- using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website;
- We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your data protection rights

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means

Withdraw consent - Where we are using your personal information on the basis of your consent, you have the right to withdraw that consent at any time.

Right to be informed - You have the right to be told how your personal information will be used. This policy document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used.

Right of access - You can write to us asking what information we hold on you and to request a copy of that information. This is called a Subject Access Request. From 25 May 2018 we will have 30 days to respond to you once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity. Details on how to submit a Subject Access Request can be found on our data protection page.

Right of erasure - From 25 May 2018, you have the right to be forgotten (i.e. to have your personally identifiable data deleted). However, we may not always be able to comply with your request of erasure for several legal reasons, which will be notified to you.

Right of rectification - If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. This enables you to have any incomplete or inaccurate data we hold about you corrected. We may need to verify the accuracy of the new data provided to us.

Right to restrict processing - In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

Right to data portability - Where we are processing your personal data under your consent, the law allows you to request data portability from us to another service provider. This right is largely seen as a way for people to transfer their personal

data from one service provider to another. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to object - You have an absolute right to stop the processing of your personal data for direct marketing purposes. Simply ask to be removed from our mailing lists.

Changes to this policy

Any changes we may make to our Privacy Policy in the future will be posted on our website and advised to clients.

Contacting us

If you have any queries about this Privacy Policy, please contact us:

Data Protection Officer: Julie Price

Email: mail@julieprice.co.uk **Call:** 01455 230707 **Post:** Julie Price and Co Ltd 48 Rugby Road, Hinckley LE10 0QD

Complaints

If, for any reason, you have a complaint, please contact the Data Protection Officer to discuss your concerns.

Following this, if you are still dissatisfied, you are able to contact the Information Commissioner's Office directly at the contact details below.

Information Commissioner: Contact telephone number: 0303 123 1113. Website: ICO website <https://ico.org.uk/>