

Privacy Notice

This privacy notice tells you what to expect we collect and process your personal information. We are committed to being transparent with you regarding the data we collect and how it is used and shared. We take the protection of your data seriously and are committed to ensuring that we meet all our obligations under relevant Data Protection laws of England and Wales.

Personal Information we collect

We will receive personal information about you when you contact us to request or obtain a quote, purchasing a product from us or from one of our partners or using our website. The information may include:

Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you.
Identification details	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number.
Financial information	Payment card number (credit or debit card), bank account number, or other financial account number and account details, credit history, credit reference information and credit score, assets, income, and other financial information, account log-in information and passwords for accessing insurance policy, claim and other accounts.

<p>Risk details</p>	<p>Information about you (and other insureds under the policy) which we need to collect to assess the risk to be insured and provide a quote. This may include data relating to health, criminal convictions, or other special categories of personal data (see below).</p>
<p>Policy information</p>	<p>Information about the quotes you receive and policies you take out.</p>
<p>Credit and anti-fraud data</p>	<p>Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you.</p>
<p>Previous and current claims</p>	<p>Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data (see below) and in some cases, surveillance reports.</p>
<p>Other sensitive information</p>	<p>Information about religious beliefs, ethnicity, political opinions or trade union membership, sexual life and orientation, or genetic or biometric information</p> <p>We may obtain information about criminal records or civil litigation history (for example, for preventing, detecting and investigating fraud)</p>

<p>Telephone recordings</p>	<p>Recordings of telephone calls with our representatives and call centres</p>
<p>Photographs and video recordings</p>	<p>Images (including photographs and pictures) or video recordings created in connection with our insurance or other business activities, including for claims assessment, administration and settlement, claim disputes, or for other relevant purposes as permitted by law, as well as CCTV recordings captured by equipment on our premises</p>
<p>Marketing preferences and marketing activities</p>	<p>Marketing preferences including preferences for our method of contact.</p> <p>To improve our marketing communications, we may collect information about interaction with, and responses to, our marketing communications</p>

How and why we use this information

We will process any personal data lawfully under one or more of the following bases:

Performance of a Contract	the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
Compliance with a Legal obligation	the processing is necessary for us to comply with the law (not including contractual obligations).
Legitimate interests	<ul style="list-style-type: none">• To add value to your product by offering you other general insurance products;• To provide high standards of service to our customers by ensuring they are fully informed about all of our products;• To engage in activities to improve and adapt the range of products and services we offer and to help our business grow;• To investigate and prevent potential fraudulent and other illegal activity.
Consent	where you have given clear consent for us to process your personal data for a specific purpose. If we need consent to process

	personal information, we'll ask for this first. This consent can be withdrawn at any time.
Necessary for reasons of substantial public interest	under the UK Data Protection Act 2018 processing for an insurance purpose is included within this basis when processing special category and conviction data.

We will use personal information about you primarily in connection with the provision of insurance, namely:

- Maintaining communications with you;
- Compliance with applicable legal, regulatory and professional obligations, including cooperating with regulatory bodies and government authorities, to comply with law enforcement and to manage legal claims;
- Arranging insurance cover (issuing quotations, renewals, policy administration);
- Handling claims;
- Undertaking anti-fraud, sanction, anti-money laundering and other checks to protect against fraud, suspicious or other illegal activities;
- Process payments when you purchase a product or service and any refunds;
- Collecting, forwarding and refunding premiums;
- Facilitating premium finance arrangements;
- Processing transactions through service providers;
- Credit assessments and other background checks;
- Where we believe it is necessary to meet legal, security, processing and regulatory requirements;
- Business transfers where we sell whole or part of our business and/or assets to a third party purchaser to allow the purchaser to administer your insurances;
- Marketing and client profiling;
- Research and statistical analysis; and

- Building databases for use by us and others we may share information with.
- Manage relationships with third parties, e.g. brokers, Insurers and service providers;
- Improve our products and services, provide staff training and maintain information security, including by recording and monitoring telephone calls;
- Conduct customer analysis, market research and focus groups, including customer segmentation, campaign planning, creating promotional materials, gathering customer feedback and customer satisfaction surveys;
- Manage complaints, including to allow us to respond to any current complaints, or challenges you or others might raise later, for internal training and monitoring purposes and to help us to improve our complaints handling processes. We may be obliged to forward details about your complaints, including your Personal Information, to the appropriate authorities, e.g. the relevant ombudsman;

We may monitor calls, emails and other communications with you. When you contact us we may keep a record of that correspondence and any information provided to us during that or any subsequent communication.

Where we obtain your information

We gather personal data directly from you, and possibly from your employer, representative, as well as other participants in the insurance market. Additionally, we may obtain information from credit reference agencies, anti-fraud databases, sanctions lists, court judgments, judicial databases, government agencies like DVLA and HMRC, open electoral registers, and other publicly accessible data sources. Furthermore, in the event of a claim, we may receive information from third parties, including the opposing party in the claim, loss adjusters, solicitors, witnesses, experts and claims handlers.

How we share this information

In utilising personal data for the aforementioned purposes, we may disclose it to third parties, which may include insurers, reinsurers, intermediaries, brokers, outsourcers, subcontractors, agents, service providers, claim handlers, premium finance providers, professional advisers, and auditors. These third parties are bound by legal and contractual obligations to maintain the confidentiality and security of personal data, and to use and disclose it in a manner consistent with what a reasonable person would consider appropriate given the circumstances, and in compliance with all relevant legislation.

Retention of your personal data

We retain Personal Information for a duration that is reasonably necessary for the purposes outlined in this Privacy Policy. We also maintain records, which may encompass Personal Information, to satisfy legal, regulatory, tax, or accounting requirements. For instance, we are obligated to maintain an accurate record of your interactions with us in order to address any complaints or challenges that may arise at a later date. Additionally, we may retain files if we reasonably anticipate the possibility of litigation. The specific retention period for your Personal Information will hinge on your association with us and the rationale behind holding your Personal Information.

To assist us in overseeing how long we retain your data and our record-keeping practices, we uphold a data retention policy that includes explicit guidelines on data retention and deletion.

Security

We are dedicated to upholding the security of your information. To prevent unauthorized access or disclosure, we have implemented suitable physical, electronic, and managerial procedures to protect and secure the information we collect. There may be occasions when we need to transfer your information outside the United Kingdom to other service providers and business partners. We will only conduct such transfers in a manner that ensures an adequate level of protection equivalent to what is mandated by United Kingdom data protection legislation.

International Data Transfers

If we process personal information outside the UK, the processing in those locations is safeguarded by UK and European data standards. In the event that the information you provide to us is transferred to countries outside the UK and the European Economic Area (EEA) by us or our suppliers, measures will be taken to establish appropriate security measures with the goal of ensuring that your privacy rights continue to be safeguarded.

Your rights

Data protection laws afford you various rights as detailed below.

We may request proof of identity when you exercise any of these rights to ensure that we disclose information only to the correct individual.

We endeavour to respond to all valid requests within one calendar month. However, it may take longer if the request is particularly complex or if you have made multiple requests. We will inform you if we anticipate that a response will take longer than one calendar month. Additionally, we may request more details regarding what you wish to receive or are concerned about.

We may not always be able to fulfil your request. This could be due to circumstances where your rights do not apply, such as when it would affect our duty of confidentiality to others, or if the law permits us to handle the request differently. We will always provide an explanation of how we are addressing your request.

Right to access your personal data

You may request confirmation that we hold personal data about you, as well as access to a copy of any such data.

Right to rectification

You may ask us to rectify any inaccurate information we hold about you.

Right to erasure

You may ask us to delete your Personal Information, but this right only applies in certain circumstances, where:

- it is no longer necessary for us to use your Personal Information for the original purpose;
- our lawful basis for using your Personal Information was by consent and you withdraw your consent; or
- our lawful basis is legitimate interests and there is no overriding legitimate interest to continue retaining your Personal Information if you object.

This isn't an absolute right and we have to balance your request against other factors such as legal or regulatory requirements, which may mean we cannot delete your Personal Information.

Right to restriction

You may ask us to stop using your Personal Information in certain circumstances such as:

- where you have contacted us about the accuracy of your Personal Information and we are checking the accuracy;

- if you have objected to your Personal Information being used based on legitimate interests.

This isn't an absolute right and we may not be able to comply with your request.

Right to portability

In some cases, you can ask us to transfer Personal Information that you have provided to us to another third party of your choice. This right only applies where:

- we have justified our use of your Personal Information based on your consent or the performance of a contract with you; and
- our use of your Personal Information is by electronic means.

Right to object

You can object if you no longer wish to receive direct marketing from us.

You may also object where you have rights relating to your particular situation and the lawful basis we rely on for using your Personal Information is our (or a third party's) legitimate interests. However, we may continue to use your Personal Information where there are compelling legitimate grounds to do so.

Automated decision making

You have the right not to be subject to a decision using your Personal Information which is based solely on automated processing (without human involvement) where that decision produces a legal effect

or otherwise significantly affects you. This right does not apply if the decision is:

- necessary for the purposes of a contract between us and you;
- authorised by law (e.g. to prevent fraud); or
- based on your explicit consent.

You do however have a right to request human intervention, express your view and challenge the decision.

Right to make a complaint

You have the right to lodge a complaint with the supervisory authority (although we would encourage you to contact us in the first instance).

The Information Commissioner can be contacted at;

Information Commissioners Office,
Wycliffe house,
Water Lane,
Wilmslow,
Cheshire, SK9 5AF www.ico.org.uk

Who to contact about your Personal Data

Use the contact details in the [‘Contact us’](#) section for any questions or concerns relating to this Privacy Notice or our data protection practices, or to make a request relating to your rights such as a subject access request.

Our Protection Officer can be contacted at:

Holgate Insurance Brokers Limited

31 Station Lane

Hornchurch Essex

RM12 6JL

Changes to our privacy notice

This Privacy Policy was last updated on 27/09/23.

Our Privacy Policy is regularly reviewed and we reserve the right to amend this at any time to take account of any changes in our business activities, legal or regulatory requirements, and the manner in which we process Personal Information.