



# DAVID UPSHALL

## *Insurance Services*

### **DAVID UPSHALL INSURANCE SERVICES - PRIVACY POLICY**

This Notice explains when and why we collect personal information about people who use our services, how we use it, the purposes for which we may disclose it to others and how we keep it secure.

It also includes information on how you may request details of any personal data we hold on you, how to amend any inaccuracies and how to complain.

Any questions regarding this Notice or our privacy arrangements should be sent by email to [privacy@daoig.co.uk](mailto:privacy@daoig.co.uk) or by writing to: Data Protection, A-One Insurance Group, Energy House, Crow Arch Lane, Ringwood BH24 1PD

#### **Who are we?**

This notice applies to a number of firms within our group.

This notice applies to the A-One Insurance Group and associated firms, which arrange insurance policies and provide connected services on behalf of clients. A-One Insurance Group includes the following firms

How do we collect information from you?

We collect your details when you request a quotation – but we can use other sources for information about you to help improve the quotes we provide.

We obtain information about you when you contact us to request a quotation or to discuss your insurance requirements and when you use our websites or visit our social media pages - for example, when you contact us about our products and services or enter a competition on our social media. In providing our service to you, we may also use information we obtain from other sources. This may be necessary to help us prevent fraud or to comply with the law.

We might collect your personal data from:

- **You, your family members, employer or representative;**
- **Other insurance market participants;**
- **Credit reference agencies**
- **Anti-fraud databases, sanctions lists, court judgements and other databases**
- **Open electoral or other public registers**
- **In the event of a claim, third parties including the other party to the claim (claimant / defendant), insurers, witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers**

Which of the above sources apply will depend on your particular circumstances.

## What type of information is collected from you?

To deal with your quotation, arrange cover or service your policy, we will need to collect various types of information about you.

In order for us to provide insurance quotations, arrange insurance policies and/or deal with any claims or complaints, we need to collect and process personal data about you. The types of personal data which are processed may include:

Types of Personal Data	Details
<b>Individual details</b>	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
<b>Identification details</b>	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number
<b>Financial information</b>	Bank account, payment card details, income or other financial information
<b>Risk details</b>	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health or criminal convictions, but only where these are relevant to arranging your cover
<b>Policy information</b>	Information about the quotes you receive and policies you take out.
<b>Credit &amp; anti-fraud data</b>	Credit history, credit score, sanctions and criminal offences and information received from various anti-fraud databases about you.
<b>Previous and current claims</b>	Information about previous and current claims, (including other unrelated insurances) which may include data relating to your health, criminal convictions and in some cases, surveillance reports

## The Legal Bases under which we will process your personal data

We process your information using one or more bases. This is a legal requirement under data protection legislation.

In providing our insurance intermediary services to you, we will use the following legal bases for the purposes of processing your data:

- **Contract - processing is necessary for arranging a contract you have with us or because you have asked us to provide a quotation with a view to entering into a contract**
- **Legitimate Interest - processing is necessary for your legitimate interests or the legitimate interests of us or a third party. This includes ensuring we can contact current customer to make them aware of other products or services or recent customers who may be interested in using our services again**
- **Legal obligation - processing is necessary for us to comply with the law**
- **Consent – if you have provided consent to process your personal data for a specific purpose**

Although we do not normally rely on asking for consent to process your data, we may do so for specific purposes. This could include asking about your marketing preferences.

## **How is your information used?**

To provide our services as an insurance broker, your information may need to be shared among other market participants, including other insurance brokers, insurers or our associated firms.

Insurance is the pooling and sharing of risk, in order to provide protection against possible future events.

To do this effectively, information – including your personal data may need to be shared between different market participants, which can include:

- **Internally within our own organisation**
- **Other firms in our wider organisation listed above, or part owned by one of the firms listed above – acting directly for you or as an intermediate seller of insurance products**
- **Other Insurance Intermediaries, Managing General Agents or Wholesale Intermediaries – acting as an intermediate seller of insurance products**
- **Insurers –acting as the underwriters and which will generally pay your insurance claims**
- **Reinsurers – acting for the underwriters to spread risks among the wider insurance market**

Due to the nature of the insurance market, it is not possible to name every single insurance participant which may have been provided with your data, in advance of your contract of insurance being arranged.

We may use your information to:

- **Evaluate the risks to be insured and matching these with appropriate policies and insurance providers**
- **Share with insurers, or other insurance providers to obtain quotations on your behalf;**
- **Process policy details with insurers to effect cover on your behalf including ongoing administration and processing any payments you are required to make**
- **Set up finance arrangements for payment of your premium and fees via third party finance providers**
- **Carry out our obligations arising from any contracts entered into by you including any subsequent adjustment or renewal**
- **Assisting with processing any claims arising under the contract**
- **Comply with our legal or regulatory obligations including financial sanctions checks**
- **Checks against credit reference, money laundering and anti-fraud databases**
- **Send you communications which you have requested or which we believe may be of interest to you, including information about other policies or services from us or our associated firms**
- **Seek your views or comments on the services we provide**
- **Notify you of changes to our services**
- **Deal with entries into a competition you have entered into with one of our firms**

## **How long will we retain your information?**

How long we will keep your information, depends on whether you are; or have been a customer - or not. We only keep information for as long as is considered necessary for the purpose.

We are legally required to keep some types of information to fulfil our contractual and legal obligations and will hold your personal information on our systems for as long as is necessary for the relevant activity.

Where you have used our services to arrange insurance cover, we will retain your data whilst any policy you hold remains current and for 6 years from expiry of your cover or the final settlement of a claim.

However, if you have asked for a quotation, but have not; to date, arranged cover, we will retain your data for a maximum of 2 years from our last contact with you.

## **Who has access to your information?**

In quoting, arranging and in order to provide efficient servicing of your insurance policies, the firms named in this privacy notice may process your information. In addition, other firms in the insurance chain may have access to your data and this may include third party firms providing additional services to you or to us.

## **Firms in the Insurance Chain**

In order to quote, arrange and service insurance policies on your behalf, including adjustments, renewals claims and complaints, as well as for regulatory and oversight purposes, we may allow the firms named in this privacy notice to process your personal data. This is to enable us to provide an efficient, effective and compliant service to you and to any beneficiaries of the policy arranged. In addition your data will be passed to other firms in the insurance chain for the purposes of offering quotations, providing cover or to service your policy including dealing with claims.

Other than for the purposes stated in this notice, we will not sell or rent your information to third parties. We will not share your information with third parties for other marketing purposes without your prior consent.

## **Third Party Service Providers working on our behalf:**

We may pass your information to third party service providers, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf; for example to assist us with our IT services or to carry out file or other auditing .

However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the firms listed above for them to use for their own direct marketing purposes, unless you have given your prior consent, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

## **Third Party Product Providers we work in association with:**

We work closely with various third party product providers to include complimentary services which may be of interest to you. These can include, for example finance arrangements, legal assistance, and breakdown cover for cars or engineering inspection. These additional services will only be included if you have agreed to this first.

In some cases, these providers will be acting as a data controller of your information and therefore we advise you to read their Privacy Notice. These third party product providers will share your information with us which we will use in accordance with this Privacy Notice.

We use a third party payment processor when you make a payment to us by debit or credit card. This processor specialises in the secure online capture and processing of credit/debit card transactions. Once we have processed your payment, we do not retain your card details, which we believe reduces the risk of fraud.

## **Your marketing choices**

How we will use your information for marketing purposes, can depend on whether you are an existing customer or not – and whether you are a business or arrange insurance as a consumer.

How we will use your information for marketing purposes, can depend on whether you are an existing customer or not – and whether you are a business or arrange insurance as a consumer.

If you are a current customer, we may contact you occasionally by post, phone or email about other insurance policies or services which we believe may be of interest to you. If you do not wish to receive these communications from us, then please let us know.

## **Consumers**

If you are a previous customer or have asked us for a quotation, within the past 2 years, we may contact you for marketing purposes by email or by phone unless you have indicated you do not wish to be contacted. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

If you have not previously asked for a quotation or to arrange cover, we will not contact you by phone or email for marketing purposes unless you have provided your consent.

## **Business customers**

If you are a business; whether or not you have arranged cover or asked for a quotation with us in the past, we may contact you for marketing purposes by post, email or by phone unless you have indicated you do not wish to be contacted.

You can change your marketing preferences at any time by contacting us by email: [privacy@daoig.co.uk](mailto:privacy@daoig.co.uk).

## **How you can access and update your information or make a complaint?**

You can ask us for a copy of what information we hold about you. We want the information we hold about you to be correct – so please let us know if you believe we hold inaccurate or out of date information or wish to make a complaint about the way we have dealt with your information.

The accuracy of your information is important to us. If you believe any information we hold is inaccurate or out of date, please email [privacy@daoig.co.uk](mailto:privacy@daoig.co.uk) or write to: Data Protection, A-One Insurance Group, Energy House, Crow Arch Lane, Ringwood BH24 1PD.

You have the right to ask for a copy of the information we hold about you using the above contact details.

Where processing your data is based on consent, you are entitled to withdraw your consent so that we stop that particular processing.

You have the right to ask us to erase your personal data, although this only applies in certain circumstances. If we are unable to comply with your request, we will respond confirming the reasons why.

If you are unhappy about the way we have dealt with any request you have made regarding your personal data, you may contact us at the above address and we will investigate on your behalf and respond as promptly as possible.

If you do so and remain unhappy about our response, you may contact the UK's independent body, set up to uphold information rights. Contact the Information Commissioners Office on 0303 123 1113, or by visiting their website: <https://ico.org.uk/>

## **Security precautions in place to protect the loss, misuse or alteration of your information**

We do our best to keep your data secure and this includes when we transmit information over our networks or when using email or the internet.

## **Use of 'cookies' when accessing our websites**

Some of our websites use 'cookies' which can help speed up your future website visits. You will be notified on the website if cookies are enabled and can choose to accept these or not.

## **Links to other websites**

On our websites, we may include links to external organisations. This privacy notice only applies to the firms listed in it.

Our website may contain links to other websites run by other organisations. This privacy Notice applies only to our services and websites, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access those using links from our websites.

In addition, if you linked to one of our websites from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the Notice of that third party site.

## **Transferring your information outside the UK**

We keep your personal information on our computer servers in the UK. On occasions, your information may be sent to firms who hold your data overseas.

We keep your personal information on our servers in the UK. However, in providing our service to you and obtaining insurance quotations or cover on your behalf, your personal data may be transferred within the European Union ("EU"), or in some cases, to countries which have similar data protection laws to the UK.



**DAVID UPSHALL**

*Insurance Services*

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