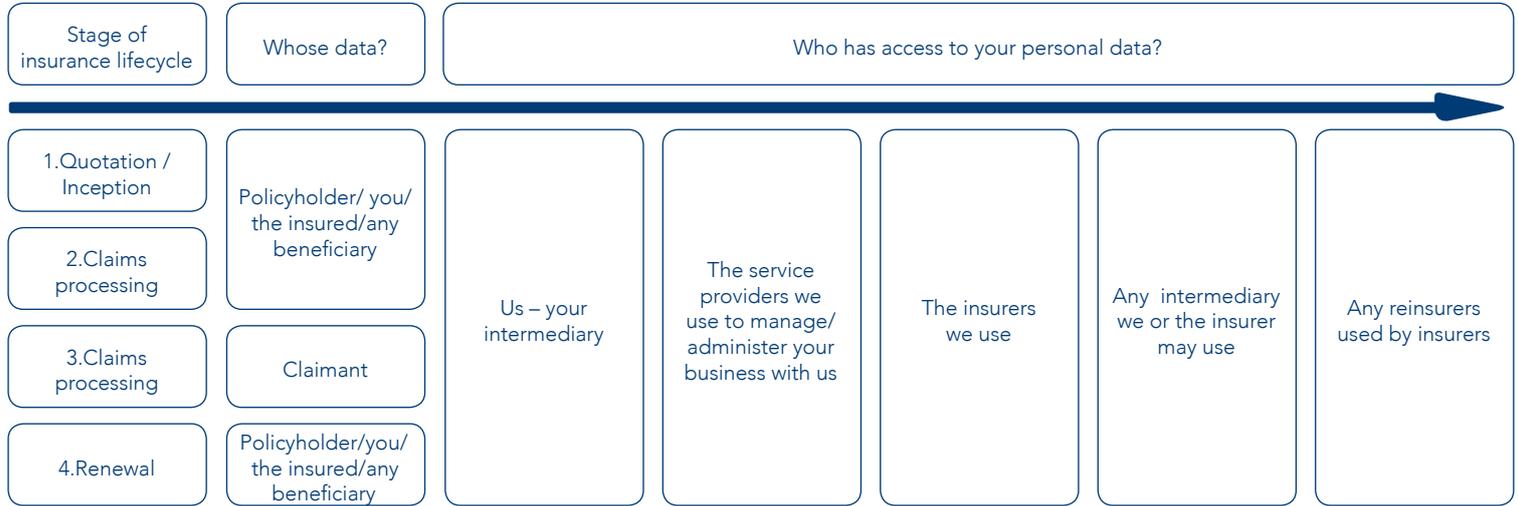


We are committed to safeguarding your privacy and this notice explains how we use any personal information we collect about you. The information that we collect about you is essential for us to be able to carry out the insurance services you require from us. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.

Background

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including your personal data, needs to be shared between different 'insurance market participants' (i.e. us as you intermediary, insurers and reinsurers). This notice is designed to help you understand how your personal data is processed through the insurance lifecycle.

Flows of personal data through the insurance lifecycle:



In addition, your data may be shared:

- if your business was introduced to us or is part of a scheme, we may share information with the introducer or scheme operator
- where we have a legal or regulatory obligation to do so (e.g. via the Police or the Financial Conduct Authority)
- with interested parties (e.g. mortgage companies, joint policy holders, leaseholders, named drivers)
- with other companies within the Alan Boswell Group

What information do we collect about you?

In order for us to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, we need to collect and process personal data about you (including 'special categories' data on occasions). The types of personal data that are processed may include:

Personal Data	Details
Individual details	Name, 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	Bank account details, income or other financial information
Risk details	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, criminal convictions, or other special categories of personal data. For certain types of policy, this could also include telematics data.
Policy information	Information about the quotes you receive and policies you take out
Credit and anti-fraud data	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you
Previous and current claims	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 and in some cases, surveillance reports
Special categories of personal data	This category includes health, criminal convictions, and trade union membership data.

Where we might collect your personal data from

We might collect your personal data from various sources (pending on your personal circumstances), including:

- you, your family members, employer or representative;
- other insurance market participants;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as the DVLA and HMRC;
- open electoral register; or
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers

Identities of data controllers and data protection contacts

The insurance lifecycle involves the sharing of your personal data between insurance market participants, some of which you will not have direct contact with. In addition, your personal data may not have been collected directly by an insurance market participant. You can find out the identity of the initial data controller of your personal data within the insurance market life-cycle in the following ways:

- Where you took out the insurance policy yourself: As your intermediary we will be the initial data controller and if requested we can advise you on the identities of other insurance market participants that we have passed your data to.
- Where your employer or another organisation took out the policy for your benefit: Your employer or the organisation that took out the policy will have details of who they passed your details onto, which is likely to include us (if you are reading this privacy statement).
- Where you are not a policyholder or an insured: You should contact the organisation that collected your personal data who should provide you with details of the relevant participant's data protection contact.

The purposes, categories, legal grounds and recipients, of our processing of your personal data

We set out below the purposes insurance market participants might use your personal data for.

Purposes

Quotation/Inception:

- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual

Policy administration:

- Client care, including communicating with you and sending you updates
- Payments to and from individuals

Claims Processing:

- Managing insurance and reinsurance claims
- Defending or prosecuting legal claims
- Investigation or prosecuting fraud

Renewals:

- Contacting the insured/policyholder to renew the insurance policy
- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual

Other purposes outside of the insurance lifecycle but necessary for the provision of insurance:

- Complying with our legal or regulatory obligations
- General risk modelling
- Transferring books of business, company sales & reorganisations

In respect of your insurance, the legal basis for processing data is to ensure the proper performance on your insurance contract. Where data processing passes the necessity and balancing tests, the legal basis on which we process your personal data for marketing purposes is because there is a 'legitimate interest'. You can stop all marketing at any point by calling, writing or e-mailing us as optout@alanboswell.com.

There may be occasions where your details are verified using public and personal data from a variety of sources including credit reference agencies and anti-fraud databases. Any credit searches will appear on your credit report whether or not you decide to take out the insurance policy.

On rare occasions, your data may need to be transferred to an insurance market participant who is located outside of the European Economic Area. Such transfers would always be made in compliance with the General Data Protection Regulations.

Profiling and automatic decision making

When calculating insurance premiums insurance market participants may compare your personal data against industry averages. Your personal data may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure premiums reflect risk. Profiling may also be used by insurance market participants to assess information you provide to understand fraud patterns. Where special categories of personal data are relevant, such as medical history for life insurance or past motoring convictions for motor insurance, your special categories of personal data may also be used for profiling. Insurance market participants might make some decisions based on profiling and without staff intervention (known as automatic decision making).

Cookies

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information please visit www.alanboswell.com/privacy. You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result

Retention of your personal data

We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under this insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

Your rights

If you have any questions in relation to our use of your personal data please contact us. Under certain conditions, you may have the right to require us to:

- provide you with further details on the use we make of your personal data/special category of data;
- provide you with a copy of the personal data that you have provided to us;
- update any inaccuracies in the personal data we hold;
- delete any special category of data/personal data that we no longer have a lawful ground to use;
- where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- restrict how we use your personal data whilst a complaint is being investigated.

In certain circumstances, we may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

If you are not satisfied with our use of your personal data, or if you think that we have breached our obligation, then you have the right to complain to the ICO. Their contact details are: Information Commissioner's Office Wycliff House Water Lane Wilmslow Cheshire, tel 01625 545 745 email casework@ico.org.uk website www.ico.org.uk.