



## PRIVACY NOTICE

for Jo Pavey Insurance Services

Jo Pavey Insurance Services treats the privacy of its customers very seriously and we take appropriate security measures to safeguard your privacy. This Policy explains how we protect and manage any personal data as defined below that you share with us and that we hold about you as required by us to arrange and administer your insurance and fulfil our legal and statutory obligations.

### HOW WE PROTECT YOUR PERSONAL INFORMATION

PLEASE READ THIS CAREFULLY

#### 1. What Data do we Collect and where do we get it from?

For the purposes set out in this notice, the Information Commissioner (ICO) requires us to advise you that, information, including personal information detailed below relating to you or anyone else to be covered by an insurance policy ("**Personal Data and Special Categories of Data**") will be collected and processed by Jo Pavey Insurance Services and/or on its behalf by its third-party service providers. This data will be provided by you, or any other person you may appoint to provide us with information. You will either be completing forms or answering questions we ask you to provide the required information. We may also obtain information from other sources that is readily available in the public domain such as the Internet, Social Media, the Press and other sources. Telephone calls to Jo Pavey Insurance Services may be recorded and monitored.

#### Personal Data....

This is information we may gather from you that will directly or indirectly identify you as an individual and may also provide information about your cultural or social identity. This type of data must be processed strictly in accordance with the Basis at Law stated in the table below. This data will include but may not be limited to: -

Your title, name, postal address, risk address, civil status, gender, current and or previous occupation, date of birth, contact details, registration number, health conditions, bank details, credit / debit card details, credit searches, national Insurance number, next of kin information, children's data where the child is under 16 (only for travel insurance policies)

#### Special Categories of Data....

This is information we may gather from you that might reveal your racial or ethnic origin, political opinions, religious or philosophical beliefs, your health, or sexual orientation. This data will be processed strictly in accordance with the Basis at Law stated in the table below. This data will include but may not be limited to: -

Your title, gender, race, ethnic origin, political opinions, religious beliefs, physical or medical health conditions, driving licence origin, UK residency period, children's data where the child is under 16 (only for travel insurance policies), criminal history. Data for criminal convictions and offences will only be collected as permitted by UK Law.

The controller of this Personal Data is Jo Pavey Insurance Services ("**we,**" "**us,**" or "**our**"). of Victoria House, Victoria Street, Taunton, Somerset. TA1 3FA. If you have any query, please contact Jo Pavey (jo@jpinsurance.co.uk). We process your Personal Data in accordance with this Privacy Notice, which is also available on our website (www.jpinsurance.co.uk)

## 2. How and why do we Process Your Personal Data?

The following tables detail: -

- why we collect your data and the consequences of not providing it
- our legal basis as required by the Regulations
- who we share your data with and why
- how long we will retain your data

<b>Legal basis for processing</b>															
<b>Why we collect your data</b>	We obtain, collect and process your Personal Data and Special Categories of Data (which includes sharing your data with others) to enable us to quote for your insurance needs, place you on cover, make any payment arrangements requested, make any alterations to your policy that you may request during the policy term, and in the event of a claim to help with the processing of the claim. We may also have regulatory and / or legal obligations for sharing data with others, but we will only share it for the purposes stated, or in a way you would reasonably expect us to, unless we inform you otherwise. If you do not provide us with any information requested, it will not be possible for us to fulfil our obligations to you as your Insurance Broker.														
<b>Our legal basis for processing your data</b>	In order to arrange your insurance, we will be using one or more of the following legal bases: - <ul style="list-style-type: none"> <li>• In respect of children’s data, a child being a person under the age of 16, which is only collected for the purposes of arranging travel insurance, we will seek parental consent to hold the data and record that consent.</li> <li>• Processing is necessary for us to take steps, at your request, to enter into a contract of insurance when you ask us to place cover, and for the performance of that contract when you need to make a claim.</li> <li>• Processing is necessary for us to comply with any legal or regulatory obligation.</li> <li>• Where we believe a customer is vulnerable, processing might be necessary to protect the vital interests of that person or other person covered by the policy.</li> <li>• We may have a legitimate interest in processing the data for changes to any quotation or policy which you may request, or for any other reason necessary to undertake any other requests related to your insurance policy.</li> </ul>														
<b>Who we share your data with and the reason for processing</b>	We are a Data Controller and, to process your requests, we may share your data with one or more other Data Controllers. Only authorised staff within our organisation and our IT Systems Administrators have access to your data. Insurers and other parties that we share your data with may have different procedures and safeguards in place when handling your data. The Data Controllers that we may share your data with and the reasons for sharing such data include, but are not limited to, the following: - <table border="1" data-bbox="420 1518 1486 2016"> <tbody> <tr> <td>Insurers</td> <td>Quotation, cover, to manage and progress claims</td> </tr> <tr> <td>Insurance Providers, (Placing Brokers, Delegated Authority Schemes, Wholesalers and the like)</td> <td>Quotation, cover, to manage and progress claims</td> </tr> <tr> <td>Insurance Brokers</td> <td>Who we may deal with in relation to the potential, sale, merger or acquisition of our business or book of business</td> </tr> <tr> <td>Loss Adjusters</td> <td>To manage and progress claims</td> </tr> <tr> <td>Loss Assessors</td> <td>To manage and progress claims</td> </tr> <tr> <td>Insurance Fraud Bureau</td> <td>Potential insurance fraud</td> </tr> <tr> <td>Financial Conduct Authority</td> <td>Regulatory obligations</td> </tr> </tbody> </table>	Insurers	Quotation, cover, to manage and progress claims	Insurance Providers, (Placing Brokers, Delegated Authority Schemes, Wholesalers and the like)	Quotation, cover, to manage and progress claims	Insurance Brokers	Who we may deal with in relation to the potential, sale, merger or acquisition of our business or book of business	Loss Adjusters	To manage and progress claims	Loss Assessors	To manage and progress claims	Insurance Fraud Bureau	Potential insurance fraud	Financial Conduct Authority	Regulatory obligations
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Financial Services & Compensation Scheme	Compensation in the event of insurer failure, if eligible
Financial Ombudsman Service	Unresolved Complaints, if eligible
National Crime Agency	Suspected criminal / fraudulent activity
HM Treasury Sanctions	Checking clients are not on the banned list
Premium Finance Company	Payment of premiums
Police	Legal obligations
Possible Suppliers	Insurers replacement goods and services providers Such as white goods, jewellers, cleaning companies, restoration companies, approved repairers and garages, windscreen replacement firms, plumbers, builders, electricians and the like.
Staff	Administering the quotation and policy, claims or payments. Back up of data.
Claims Management Company	To manage and progress claims
Surveyors	To complete risk surveys to analyse and report on risk and to put forward risk improvement requirements and recommendations. In addition, in the event of a loss to complete post loss surveys.
Debt Agencies	To collect unpaid premium due
IT Providers - Software	Holding of management information and system testing
IT Providers - Hardware, Cloud & Systems Management	To detect issues, secure and test systems and data backup
Interested Parties such as Mortgage Lenders.	To provide proof of cover
Third Party Insurers	To manage and progress claims
Third Party Assessor	To manage and progress claims
Credit Reference Agencies	To obtain competitive premiums from certain Insurance Providers
Mylicence (UK)	To meet legislative requirements
DVLA	To meet legislative requirements
Motor Insurers Database	Registering vehicles to meet legislative requirements
Motor Insurers Bureau	To meet legislative requirements
Claims and Underwriting Exchange	Sharing of claims data between Insurers
Employers' Liability Tracing Office	To provide confirmation of cover being in place
Solicitors	Claims against our clients or ourselves
Interpreters	For management of policies and claims where language is a barrier or where use of sign language is required
Other Data Controllers not detailed above	To be shared only for the purposes stated, or in a way you would reasonably expect us to, unless we inform you otherwise.

<b>How long we retain your data</b>	We will retain your Personal Data for as long as you remain a client of Jo Pavey Insurance Services and for a period of 15 years thereafter except as varied below. Notwithstanding the above debit and / or credit card details are only retained for a maximum period of two working days to enable processing of a specific payment
<p><b>IMPORTANT</b></p> <ul style="list-style-type: none"> <li>• For some of our products for example motor and household insurance, we may carry out automated decision making (including profiling) to process your personal data for insurers to underwrite and price your insurance online and/or process your claim.</li> <li>• We have stated the reasons we collect data however if you do not wish to provide us with your Personal Data for the purposes stated above we will be unable to fulfil our obligations to you as an Insurance Broker.</li> <li>• If at any point in the future, we need to amend this Privacy Notice every effort will be made to make you aware and we endeavour to have the latest version on our website.</li> </ul>	

### 3. Where do we hold your Data?

At all times we will endeavour to hold your Data on servers within the UK, or within the European Economic Area (EEA).

### 4. Your Acknowledgment of this Notice and Your Rights

Under General Data Protection Regulation, you have rights, and these are listed below.

<b>The Right to be Informed</b>	The General Data Protection Regulation sets out the information we must provide to you about your Data. All information we are required to give you is contained within this Privacy Notice. If you do not understand any part of this, you should contact us immediately and we will be pleased to explain it to you.
<b>The Right of Access</b>	You have the right to access and obtain a copy of the Personal Data, and any supplementary information that we hold about you to enable you to verify the lawfulness of the processing carried out. This will be provided free of charge, unless your request/s is/are unfounded, excessive or repetitive, and the information will be sent to you within 30 days of your written request being received. If we refuse your request, you have the right to complain to the ICO.
<b>The Right to Rectification</b>	You have the right to request in writing that we correct any inaccuracies in the Personal Data we hold about you. Such corrections will be made within 14 days. If we are unable to correct the inaccuracy you have the right to complain to the ICO.
<b>The Right to Erasure</b>	<p>You have the right to request that we erase your Personal Data. For example, you may exercise this right in the following circumstances:</p> <ul style="list-style-type: none"> <li>• your Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by us;</li> <li>• you withdraw consent and no other legal ground permits the processing;</li> <li>• you object to the processing and there are no overriding legitimate interests for the processing;</li> <li>• your Personal Data was unlawfully processed; or</li> <li>• your Personal Data must be erased for compliance with a legal obligation.</li> </ul> <p>We will refuse the right to delete your information when it falls within our data retention period stated above, as this data may be required to exercise or defend litigation in the event of a claim whether covered or not by an insurance policy. If you do not agree with this, you have the right to complain to the ICO.</p>

<b>The Right to Restrict Processing</b>	<p>You have the right to restrict our processing of your Personal Data where any of the following circumstances apply, although we will still be allowed to store it:</p> <ul style="list-style-type: none"> <li>• where you feel that the Personal Data which we hold about you is inaccurate. Processing will be restricted until you verify the accuracy of the information</li> <li>• where the processing is unlawful, and you do not want your Personal Data to be erased and request the restriction of its use instead;</li> <li>• where we no longer need to process your Personal Data, but the data may be required to establish, exercise or defend a legal claim</li> <li>• where you have objected to our processing of your Personal Data pending the verification of whether our legitimate business interests override your interests, rights and freedoms.</li> </ul> <p>Where you exercise your right to restrict our processing of your Personal Data, we will only continue to process it in accordance with the requirements of this policy or our legal obligations.</p>
<b>Right to Data Portability</b>	<p>You have a right to receive and transfer the Personal Data that we hold about you. This only applies to: -</p> <ul style="list-style-type: none"> <li>• personal data you have provided to us</li> <li>• where the data was processed by you giving us your individual consent or for the performance of a contract</li> <li>• and where processing was carried out by automated means.</li> </ul> <p>Where you make such a request, this will be provided in a structured, commonly used, machine readable format such as a CSV file. This will be completed within one month of us receiving your request.</p>
<b>Right to Object to Processing</b>	<p>In certain circumstances, you have a right to object to our processing of your Personal Data</p> <ul style="list-style-type: none"> <li>• Where we have processed it as a legitimate interest (including profiling)</li> <li>• Direct Marketing (including profiling)</li> <li>• Processing for scientific / historical research and statistics</li> </ul> <p>We will still be able to process your Personal Data where</p> <ul style="list-style-type: none"> <li>• We can demonstrate compelling legitimate grounds for us to process your Personal Data which override your interests, rights and freedoms</li> <li>• The processing is for establishment, exercise and defence of legal claims.</li> </ul>
<b>Right to Object To automated decision making including profiling</b>	<p>You have a right not to be subjected to decisions being made solely by automated means without any human involvement. This might be the case where quotations are obtained online. We will still be able to carry out this type of decision-making where: -</p> <ul style="list-style-type: none"> <li>• It is necessary to enter into or for the performance of a contract (such as a contract of insurance) which is the main reason we would use this type of decision-making; or</li> <li>• You have given your explicit consent for us to do so.</li> </ul> <p>We will endeavour to only process data in the way you would expect it to be used, and you will be entitled to have a person from our firm to review the decision so that you can query it and set out your point of view and circumstances to us.</p>
<b>Right to Withdraw Consent</b>	<p>Where the legal basis of consent has been used (and in our business we only use this for parental consent when collecting children's data in connection with travel insurance), you have the right to withdraw that consent at any time. Where you exercise your right to withdraw parental consent of the processing of any children's data, any data processed prior to the withdrawal of consent will remain valid.</p>

If you would like to exercise any of your rights detailed above, please contact Jo Pavey (jo@jpinsurance.co.uk)

You may raise any concerns regarding Jo Pavey Insurance Services processing of your Personal Data with the Information Commissioner Office through <https://ico.org.uk/>.

## **5. Changes to this Notice**

We may amend this notice on occasions in whole or in part at our sole discretion. If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail or post and you will have a choice as to whether we use your information in the new manner. If you have questions or concerns about this notice, please contact Jo Pavey (jo@jpinsurance.co.uk).

## **6. Information about or provided by another person**

Where you have taken out a policy and provided us with information about another person for example an additional driver to your motor policy, an additional person to your travel insurance particularly where health conditions have been disclosed, it is unlikely we will have their address, and therefore you must provide them with a copy of this Privacy Notice so that they will know how their data is being used. Additional copies can be supplied on request.