Our Privacy Notice for Customers

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 <u>privacy@aoig.co.uk</u> 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 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:

- A-One Insurance Services (Bmth) Ltd
- A-One Insurance Services (Blandford) LLP
- Aspire Insurance Services Ltd
- Preston Insurance Brokers LLP
- Property Wealth Insurance Brokers LLP
- PJ Aiken Insurance Services Ltd
- Fowler Penfold Scheme Brokers Ltd
- McComish Insurance Brokers Ltd
- Jackson Insurance Brokers LLP

The Head Office address for the above firms is: Energy House, Crow Arch Lane, Ringwood BH24 1PD

This notice also applies to the following associate firms:

- David Upshall Insurance Services, of 44 South St, Dorchester DT1 1DQ
- Concorde Insurance Brokers Ltd, of 96 Winchester Rd, Chandler's Ford, Eastleigh SO53 2GJ

Each firm acts as Data Controller in relation to your personal information and A-One Insurance Services (Bmth) Ltd also acts as Data Processor.

How do we collect information from you?

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 adjustors, solicitors, and claims handlers

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

What type of information is collected from 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
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	Bank account, payment card 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 or criminal convictions, but only where these are relevant to
	arranging your cover
Policy information	Information about the quotes you receive and policies you take out
Credit & anti-fraud data	Credit history, credit score, sanctions and criminal offences and
	information received from various anti-fraud databases about 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- and in some cases, surveillance reports

The Legal Bases under which we will process your personal data

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?

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?

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?

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.

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@aoig.co.uk .

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

The accuracy of your information is important to us. If you believe any information we hold is inaccurate or out of date, please email <u>privacy@aoig.co.uk</u> 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.

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: <u>https://ico.org.uk/</u>

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

When you give us personal information, we take steps to ensure that it's treated securely. In providing our service to you, your details are transmitted by us using encryption. As a result, we strive to protect your personal information, however we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Any sensitive information which is transmitted (such as credit or debit card details) is encrypted and protected.

Where you have provided a password to us, allowing family members or others to discuss your insurance arrangements, you are responsible for keeping this password confidential. We ask you not to share your password with anyone you do not wish us to discuss your policy with.

We don't use many cookies on our website, and we only use those that are completely necessary to provide a better user experience. You will be notified on the website if cookies are being used.

'Cookies' are small pieces of information sent by an organisations website to your computer and stored on your hard drive or web browser and allows that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, cookies may be used to store your country preference or other information you have provided. This helps to improve the speed of the website for your future visit and deliver a better more personalised service.

We use cookies to count how many visitors we receive to our pages, using Google Analytics. We also use cookies for our embedded videos from YouTube and Vimeo.

If you don't like the idea of cookies, you can change your browser's settings to delete cookies that have already been set and to not accept new cookies going forward. You will need to visit the help pages of your web browser to learn more. Please note, however, that if you delete cookies or do not accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

Links to other websites

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 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.

Review of this Notice

We may change this Notice from time to time so please check this page occasionally to ensure that you're happy with any changes.

This Notice was last updated in May 2018.