



PRIVACY POLICY

We have set out in this document how and why we process personal information and also how we fulfil our legal requirement to protect a customer client or business partner's privacy.

Our Privacy Mission Statement

At JHL, client and business partner privacy and personal data is very important to us.

'Our mission is to ensure personal data is protected at all times and only processed for **legitimate reasons** when handling the insurance programme policies or business contracts. To achieve this we will comply at all times with the applicable data protection legislation.' As part of our mission, we will abide by the following principles:

- Personal data is to be processed lawfully, fairly and transparently
- Personal data is to be collected only for specified, explicit and legitimate purposes
- Personal data must be adequate, relevant and limited to what is necessary
- Personal data must be accurate and up to date
- Personal data must not be kept for longer than necessary
- Appropriate technical and organisational measures must be taken ensure security, integrity and confidentiality of personal data
- Personal data must not be transferred outside the EEA without appropriate safeguards

We will never sell information to any third party.

Further details of our compliance with data protection legislation are set out in this Policy (and elsewhere as referenced below).

Data Protection Legislation

Details of applicable data protection legislation (including the Data Protection Act 1998 ("DPA") and General Data Protection Regulation ("GDPR") can be found at the Information Commissioner's Office website (www.ico.gov.uk).

For the purposes of data protection legislation, we will be the "Controller" of all personal data held in respect of this Policy.

In this Policy we use the following definitions:

"Data" means information which is stored electronically, on a computer, or in certain paper-based filing systems.

"Data subject" means any living individual about whom we hold personal data.

"Personal data" means data from which a living individual can be identified (whether or not also using other information in our possession).

"Controller" means a person or organisation which determines how and why personal data is processed.

"Processor" means any person or organisation which processes personal data on behalf of and/or on the instructions of a Controller.

"Processing" means any activity involving use of personal data, including obtaining, holding using, organising, amending, disclosing, erasing or destroying it.

“Sensitive personal data” means certain personal data about a data subject’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, and including genetic data and, biometric data.

We reserve the right to amend this Policy from time to time without prior notice. You are advised to check regularly for any amendments (NB amendments will not be made retrospectively).

How will JHL use personal data?

1. to perform business or insurance contracts or to take steps upon request prior to entering into such a contract, including:
 - a. processing the insurance programme or policies by obtaining quotations from our Agency base (of insurers);
 - b. providing clients and prospective clients with information about our goods or services;
 - c. enabling us to offer new and renewal terms;
 - d. applying for credit terms;
 - e. undertake credit or identity checks;
2. to exercise our legitimate business interests, including:
 - a. providing management information to our board of directors;
 - b. providing claims information to third parties, where necessary;
 - c. identifying and preventing fraud;
 - d. auditing and debt collection.

For personal data to be processed in accordance with our legitimate interests:

- i. we must have a genuine business need to process the information in the manner proposed;
 - ii. this business need must be balanced against the interests of the individual data subject(s) concerned; and.
 - iii. the processing must be fair and lawful and must comply with all the data protection principles set out above.
3. to perform other business functions with your specific consent (which you may freely grant, amend and withdraw at any time), including:
 - a. providing you with the best possible customer service
 - b. keeping you updated about our other services and products.

Please note we will never sell client information or personal data to any third party. However, we may make information available to third parties:

- i. with your prior consent (which you may freely grant, amend and withdraw at any time)
- ii. where required to do so by law
- iii. in the event that we sell any part of our business or assets (in which case we may disclose your personal data confidentially to the prospective buyer as appropriate in accordance with our legitimate interests).

Privacy Policy Information

We will only collect personal data to the extent that it is required for the specific purpose made clear to you at the time and we will only process it in accordance with relevant data protection legislation. Such personal data may include:

- a. Contact and telephone number
- b. IP and Email address
- c. Email content & various documentation sent to us
- d. Monitoring and recording of telephone calls and logging details of your interactions with us
- e. Personal/company information to process insurance programme policies or business contracts

We will retain your personal data for as long as:

- a. you remain a business partner or client or your account remains valid;
- b. any contracts you have with us are live;
- c. we have your consent to do so;
- d. is necessary to comply with our legitimate business interests; and/or
- e. is necessary to comply with our legal obligations.

In addition, our websites uses cookies – these are small text files which are sent to your computer when you log into our website and which allow us to keep track of your log-in status even if you leave the website and return. NB: a cookie only tracks which PC is logging on to a website; it does not identify (and we do not record) who is using that PC. (You may refuse to accept cookies by changing the settings on your browser. However, doing so may affect your ability to access or use certain parts of a website.)

Where is information stored?

Data is stored securely on servers internally by us and / or by Acturis our broker platform.

We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

If we have a paper file it will be kept secure in locked cabinets.

Access to information is restricted to authorised personnel only and is kept secure at all times.

Marketing

We may distribute information about our products and services to our clients. We will always include an “opt out” or “unsubscribe” option with any such communication.

E-Newsletters

We may use third party processors to populate useful newsletters on our behalf. We will only provide such third parties with email addresses and the nature of the content required. No other information will be provided.

We may gather information relating to the success of these campaigns and what information is useful for our clients. Wherever appropriate, such information will be pseudonymised or anonymised. Recipients may opt out by following the links within the email.

Telephone calls

In order to verify identity prior to engaging we will always ask security questions which are relevant specifically to the client and the answers to which are known only to the specific client.

We may monitor or record telephone conversations. This helps to handle complaints swiftly, improve customer service, staff training and security.

Privacy Statement (website)

Our website has a separate privacy statement about how our website is managed. To access this please click on the link at www.jameshallam.co.uk or request a copy, by contacting us.

We keep our privacy policy under regular review and will place any updates on our web page.

Legal Rights of Access

All individuals have the following rights in respect of their personal data held by us:

- a. to access their personal data
- b. to be provided with information about how their personal data is processed (this information is set out in this Policy)
- c. to have their personal data corrected where necessary (please contact us promptly should you become aware of any incorrect or out-of-date information)
- d. to have their personal data erased in certain circumstances (please refer to the appropriate data protection legislation or consult the ICO for details)
- e. to object to or restrict how their personal data is processed
- f. to have their personal data transferred to themselves or to another business

You have the right to take any complaints about how we process your personal data to the Information Commissioner:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

<https://ico.org.uk/concerns/> 0303 123 1113.

Please address any questions, comments and requests regarding our data processing practices to our *Data Protection Officers* as undernoted:

Diana Bratt at Saxon House, Chelmsford, Essex, CM1 1HT

Andrew Hall at James Hallam House, Irongray Road, Dumfries, Scotland, DG2 0HS

Use of data processors

Seventeen Group Limited [our Parent Company] may require access to personal data held by us for management and processing purposes.

Acturis are our broker platform and may require access to personal data held by us but will only process information as Processor in accordance with our instructions as Controller in order to maintain security and information within the system.

Softcat provide IT support to our internal IT team and may require access to our systems on a controlled basis.

Various insurance companies and other agents may require access to personal data held by us for underwriting and claims purposes.

Credit agencies may require access to personal data held by us for credit or identity checks premium collections and anti-fraud protection.

Third party marketing companies may require access to personal data held by us as set out above.

Contacting us

If you requires any further information please contact our Data Protection Officers as set out above or your local JHL office.

If you need to update your data at any time or inform us of any changes, please contact your local JHL office.

If you no longer want to be contacted by us, please advise us accordingly.

Website

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

Our registered office is:

156 South Street, Dorking, Surrey, RH4 2HF