

PRIVACY POLICY

Document Change History – internal use only			
Version	Date of Change	Description of Change	Location of Change
<u>V4</u>	<u>07.01.20</u>	<u>Introduction of document version control ; modified to cater for 'non client's and retention period clarified</u>	
<u>V5</u>	<u>01.05.20</u>	<u>Change of Oversight and Responsibility role</u>	
<u>V 6</u>	<u>01.05.21</u>	<u>DPO replaced with 'Privacy Officer'</u>	

Summary – internal use only		
Policy Author	Policy Implementer	Policy Oversight and Responsibility
<u>Andrew Hall</u>	<u>Andrew Hall</u>	<u>David Allori</u>
Policy Review Period	Effective From	
<u>12 months</u>	<u>01.05.2021</u>	

Privacy Policy

About us

James Hallam Ltd [also referred to as “JHL”, “we”, “us”, or “our”] are a registered company in England [Company no. 1632840]. Our registered address is 156 South Street Dorking Surrey RH4 2HF.

The purpose of this policy

This Policy is designed to help you understand what kind of information we collect in connection with our products and services and how we will process and use this information. In the course of providing our services, we will collect and process information that is commonly known as personal data.

This Policy describes how we collect, use, share, retain and safeguard personal data.

This Policy sets out your individual rights; we explain these later as below but in summary, these rights include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.

What is personal data?

Personal data is information relating to an identified or identifiable natural person. Examples include an individual’s name, age, address, date of birth, and gender and contact details.

Personal data may contain information, which is known as special categories of personal data. This may be information relating to an individual’s health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to or sexual orientation.

Personal data may also contain data relating to criminal convictions and offences.

For the purposes of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data, where we are legally required to comply with specific data processing requirements.

Personal data we collect

In order for us to arrange and administer insurance or business contracts or services, we will collect and process personal data about you. We will also collect your personal data where you request information about our services, customer events, promotions and campaigns.

We may also need to collect personal data relating to others in order to arrange and administer insurance. In most circumstances, you will provide us with this information. Where you disclose the personal data of others, you must ensure you are entitled to do so.

You may provide us with personal data when completing online quote or contact forms, when you contact us via the telephone, when writing to us directly or where we provide you with paper based forms for completion or we complete a form in conjunction with you.

We will share your personal data within our firm or group of companies and with business partners. This is normal practice within the insurance industry where it is necessary to share information in order to place, quantify and underwrite risks, to assess overall risk exposure and to process claims. It is also necessary to determine the premium payable and to administer our business.

We also share personal data with authorised third parties. This is necessary where we are required to do so by law, where we need to administer our business, to quote for, source, place and administer your insurances including arranging insurance premium finance, to perform underwriting activities and to process claims [These activities may incorporate anti-fraud measures including credit and identity checks] . Examples of authorised third parties may include but are not limited to :

- Insurers ,Reinsurers or Underwriters
- Premium finance providers;
- Credit reference agencies;
- Debt recovery agencies;
- Claims handling companies;
- Loss adjusters;
- Insurance brokers;
- Statutory or regulated authorities or law enforcement body.
- Anyone you have authorised to deal with us on your behalf.

We may also collect your personal data when you visit our website, where we may collect your unique online electronic identifier. This is commonly known as an IP address.

We may also collect electronic personal data when you first visit our website where we will place a small text file that is commonly known as a cookie on your computer. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating our website and when using features. You may refuse to accept cookies by changing the settings on your browser. However do so may affect your ability to access or use certain parts of a website.

We may monitor or record your communications with us or log details of your interactions with us. This helps us to handle complaints swiftly improve customer service staff training and security.

Where we collect data directly from you, we are considered the controller of that data i.e. we are the data controller. Where we use third parties to process your data, these parties are known as processors of your personal data.

A data 'controller' means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data 'processor' means the individual or organisation, which processes personal data on behalf of the controller.

As a provider of insurance services, we will process the following categories of data:

- Personal data such as an individual's name, address, date of birth, gender, contact details and details of historic claims
- Special categories of personal data such as health and details on historic claims resulting in injury [physical and physiological]
- Data relating to criminal convictions and offences such as details of driving offences or insurance fraud

If you object to the collection, sharing and use of your personal data, we may be unable to provide you with our products and services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

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

If you require more information about our insurance processes or further details on how we collect personal data and with whom we share data with, please contact our Privacy Officer as noted below.

Why do we need your personal data?

We will use your personal data for the performance of our contract with you, to quote for and provide you with insurance products and services, to process claims and renewals, to administer your policy and our business, to respond to any requests from you about services we provide and to process complaints. We will also use your personal data to exercise our legitimate business interests including the management of your account, to perform statistical analysis on the data we collect, for financial planning and business forecasting purposes and to develop new and market existing products and services.

We will use the special category and criminal conviction data we collect about you for the performance of our contract with you, which is deemed necessary for reasons of substantial public interest. This allows us to quote for and provide you with insurance products and services, to process claims and renewals and to administer your policy.

In purchasing our products and services, you should understand that you are forming a contract with us. If you contact us for a quote or request details on the services we provide, we consider ourselves as having a legitimate business interest to provide you with further information about our services.

In some situations, we may request your consent to market our products and services to you, to share your data or to transfer your data outside the European Economic Area. Where we require consent, your rights and what you are consenting to will be clearly communicated to you. Where you provide consent, you can withdraw this at any time.

We will normally retain your personal data for no more than 6 years after the termination of any service or contractual agreement with you or for as long as:

- is necessary to comply with our legal or regulatory obligations and / or
- is necessary to comply with our legitimate business interests and / or
- we have your consent to do so

In certain cases we will retain your personal data for a longer period particularly where for example a product includes liability insurance for which a claim could be made against you at a future date even after your contract with us has ended.

You should be aware that we may use automated decision-making [services/tools and techniques] to check for customer suitability to our products. For example, we might perform a credit search to check an individual's solvency and credit rating. We also analyse data to identify products and services that customers may be interested in; this is commonly known as profiling. You have the right to object to the use of profiling activities and the use of automated decision-making.

Your rights

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data.

These rights are known as Individual Rights under the Data Protection Act 2018. The following list details these rights:

- The right to be informed about the personal data being processed;
- The right of access to your personal data;
- The right to object to the processing of your personal data;
- The right to restrict the processing of your personal data;
- The right to rectification of your personal data;
- The right to erasure of your personal data;
- The right to data portability[to receive an electronic copy of your personal data];
- Rights relating to automated decision-making including profiling.

Individuals can exercise their Individual Rights at any time. As mandated by law we will not charge a fee to process these requests. However, if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

In exercising your Individual Rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for taxation, prevention of crime and for regulatory and other statutory purposes.

You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

The flow of data within the insurance sector is complex and we ask you to keep this in mind when exercising your 'rights of access' to your information. Where we may be reliant on other organisations to help satisfy your request this may impact on timescales.

If you require further information on your Individual Rights or you wish to exercise your Individual Rights, please contact us.

Protecting your data

We will take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data, including when sharing your data within our firm or group of companies and authorised third parties. We will notify you promptly in the event of any breach of your personal data, which may expose you to serious risk.

Privacy Officer

To ensure data privacy and protection has appropriate focus within our organisation we have appointed a Privacy Officer who reports to our senior management team.

Our Privacy Officer is

Andrew Hall at James Hallam Ltd Queen of the South Arena Dumfries Scotland DG2 9BG

Please address any questions comments and requests regarding this Policy to the above named individual

Complaints

If you are dissatisfied with any aspect of the way in which we process your personal data, please contact us.

You also have the right to complain to the UK's data protection supervisory authority, the Information Commissioner's Office [ICO]. The aforementioned may be contacted via its website which is <https://ico.org.uk/concerns/>, by [live chat](#) or by calling their Helpline on 0303 123 1113.