

# Privacy Policy

## Who We Are

We are SJL (Worcester) Limited, Company No. 09510028 trading as SJL Insurance Services. We have created this privacy policy statement in order to demonstrate our firm commitment to safeguarding the privacy of our customers.

Please review this Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event that you have a complaint.

SJL Insurance Services collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the Data Protection Act 1998 and from 25<sup>th</sup> May 2018 by the General Data Protection Regulation and we are responsible as 'controller' of that personal information for the purposes of those laws.

## What Information Do We Collect?

We will collect, store and use the following kinds of personal information directly from you in relation to the provision of our services:

- information that you provide to us being your email address, name, address, business name and address, phone number, date of birth, occupation, gender, bank details, payment information, criminal history, relevant medical information, details of previous claims, details of any previous refusals of insurance, credit history, details of any co-insured third parties and details of other policies that you hold.

We may also collect, store and use the following kinds of personal information which we obtain otherwise than directly from you:

- information that you provide to any broker to whom we provide our insurance services, comprising your email address, name, address, business name and address, phone number, date of birth, occupation, gender, bank details, payment information, criminal history/convictions, relevant medical information, details of previous claims, details of any previous refusals of insurance, credit history, details of any co-insured third parties and details of other policies that you hold;
- Information relating to the usage of our website collected using cookies (these are text files placed on your computer to collect standard internet log information and visitor behaviour information);
- your credit history and any financial sanctions affecting you;

We require this information for the purposes of carrying out our contract with you to provide insurance services. If you do not provide us with all the necessary information, we will not be able to provide our services to you.

## Using Your Personal Information

The legal basis for our processing of your data is for the performance of our contract with you, and where we process special personal data in order to do this, you have specifically consented to this. The information that we collect about you is necessary for the performance of our contract with you to provide insurance services, to take steps to provide you with a quote for suitable insurance policies, to put such policies in force if you so instruct us and to arrange for payment of the premiums. Some of the data that we are obliged to collect is classified as special data, and that is why you must give us your specific consent to process that special data for the purposes of providing our services.

Where you have chosen to pay your insurance premiums in instalments with your insurer, through direct debit or through a finance provider, we shall disclose your name, address, email address, date of birth and bank details to them. In addition we may disclose your personal information where we are required to do so by law.

The legal basis on which we may collect information on special categories of personal data and criminal convictions is that the processing is required for insurance purposes and is necessary for reasons of substantial public interest (for example to assist with the prevention, detection and investigation of fraud).

We will use your personal information to:

- administer and assist you with your quotes, policies and claims;
- send you details of policies purchased;
- send statements and invoices to you, and collect payments from you;
- where you have given us explicit consent, create and inform you of products or services that may better meet your needs;
- where you have given us explicit consent, send you general (non-marketing) commercial communications;
- where you have given us explicit consent, send you email notifications which you have specifically requested;
- where you have given us explicit consent, provide third parties with statistical information about our clients – but this information will not be used to identify any individual user; and
- deal with enquiries and complaints made by or about you.

You can inform us at any time if you no longer require marketing communications.

If you require any further information in regards to how your data is processed this can be achieved by contacting Karl Evans who is responsible for controlling data at the firm by emailing [info@sjlins.co.uk](mailto:info@sjlins.co.uk).

## **Transfer of Data Abroad**

We will process your personal data within the EU, however if you are located outside of the EU our correspondence with you will be classified as processing data outside of the EU. If you do not wish us to process your data in this way, we will not be able to provide our services to you.

## **Consequences of Our Use of Your Personal Information**

We offer products from a wide range of insurance companies and in order to provide our services it will be necessary to pass your information to those insurance companies, intermediaries and reinsurers. Sometimes we may only approach a specified number of insurers, known as a panel of insurers, or in some cases we may only approach one insurer. In any event, we will tell you as part of our process and upon request, we will provide you with a list of the companies that form any panel we have approached on your behalf. In order to deliver our services to you effectively we will share your details with the following additional third parties:

- our professional compliance advisor;
- our solicitors;
- underwriters;
- financial crime sanctions checking service;
- and where required loss adjustors, claims handlers and the third party company we use to run our direct debit payment service .

The London Insurance Market has produced a Core Uses Information Notice which sets out those core necessary personal data uses and disclosures throughout the insurance lifecycle, and in particular sets out how other insurance market participants process your personal data. Our core uses and disclosures are consistent

with the London Market Core Uses Information Notice. In addition to reviewing this privacy policy, we recommend you review the London Insurance Market Core Uses Information Notice

[http://lma.informz.ca/LMA/data/images/Bulletin%20att/LMA17\\_038\\_MS\\_att1\\_information\\_notice.pdf](http://lma.informz.ca/LMA/data/images/Bulletin%20att/LMA17_038_MS_att1_information_notice.pdf)

Please note that **we** do not control the LMA website and are not responsible for the London Insurance Market Core Uses Information Notice.

## **Providing Information to Third Parties**

Other than as explained in “Consequences of Our Use of Your Personal Information” SJL Insurance Services will not disclose your personal information. SJL Insurance Services will not disclose your information to any third party for the purposes of direct marketing.

## **Security of Your Personal Data**

We take appropriate technical and organisational precautions to ensure a level of security appropriate to the risks involved in processing your personal information and in particular to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure servers. All email communications between us will be encrypted using SSL technology.

The transmission of data over the internet is inherently insecure. Although we aim to protect your personal data, and all emails we send are encrypted we cannot guarantee the security of data sent over the internet. Once your personal information is in our possession, we will use technical precautions to prevent unauthorised access.

## **Data Retention**

As a regulated insurance intermediary, we are subject to regulatory requirements to retain data for specified minimum periods. These periods are set out below. We may retain data for longer than this if we reasonably anticipate that it may be required to defend a future claim against us.

Subject to the above paragraph, personal information will be kept for the following periods:

Quote information (where a policy is not taken out) – 15 Months;

Policy Information – The life of the policy plus 10 years, unless required to do so in compliance with the Employers Liability Tracing Office whereby the information will be retained for 40 years;

Claims Information – 10 years from when the claim is finalised.

## **Your rights**

Under the General Data Protection Regulation you have a number of rights in respect of your personal information which you can exercise without any cost. These rights are summarised below.

### **Right of Access**

You have the right to request a copy of your personal data and supplementary information. This will be provided free of charge and within one month of SJL Insurance Services receiving your request. Any further copies will only be provided after settlement of a £10.00 administration fee.

### **Right to Rectification**

You have the right to have your personal data rectified if the data is inaccurate and/or incomplete. Such requests will be dealt with within one month, which may be extended by us to two months for complex cases.

### **Right to Erasure (Right to be Forgotten)**

You have the right to request the deletion or removal of your personal data where the personal information is no longer necessary for the purpose it was originally processed for.

### **Right to Restrict Processing**

You have the right to 'block' or suppress the processing of your personal data where:

- you have contested the accuracy of your personal information and we are processing the accuracy of this information; or
- we no longer require the personal information but you require us to retain it in order to establish, exercise or defend a legal claim.

### **Right to Data Portability**

You have the right to data portability in respect of personal information you have provided us which allows you to obtain and reuse your personal data for your own purposes across different services.

### **Right to Object**

You have the right to object and to withdraw your consent at any time to the processing of your personal information for marketing purposes.

You may instruct us not to process your personal data for marketing purposes by sending an email to [info@sjlins.co.uk](mailto:info@sjlins.co.uk) at any time.

If you would like to exercise any of the above rights, please:

email us at [info@sjlins.co.uk](mailto:info@sjlins.co.uk) or write to us at the address listed below;

let us have enough information to identify you (e.g. name and policy quote reference); and

let us know the information to which your request relates.

## **Privacy Policy Amendments**

This privacy policy was published on 1<sup>st</sup> May 2018.

We may update this privacy policy from time-to-time by posting a new version on our website, however we shall notify you of changes to our privacy policy that affect the data we hold about you by email.

## **Complaints**

If you are unhappy with how your personal data is processed you have the right to lodge a complaint with the supervisory authority for data protection. In the UK this is:

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

0303 123 1113 (local rate)

## **Updating Information**

Please ensure that the personal information we hold about you is correct and up-to-date by contacting:

SJL Insurance Services  
Suite C The Kays Building  
The Tything  
Worcester, WR1 1HD

Email: [info@sjlins.co.uk](mailto:info@sjlins.co.uk)

## **Contact**

If you have any questions on our privacy policy, please contact Karl Evans, by emailing [info@sjlins.co.uk](mailto:info@sjlins.co.uk).