

# Privacy & Your Personal Information

## Use of personal information

We are committed to ensuring your privacy is protected. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this Privacy Policy carefully. When using our website, this Privacy Policy should be read alongside the website terms and conditions.

This Privacy Policy describes how Hepburns Insurance Services Limited, "we" or "us" or "HISL" collect and process data about individuals. We are insurance intermediaries and part of the Leaders Romans Group of companies.

To provide our services we will collect and use information about you or a beneficiary under the policy (e.g. other identified individuals), such as name, address and contact details. This may also include special categories of personal data such as information relating to criminal convictions and offences. All processing (i.e. use) of your personal information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract (e.g. where we help with processing your insurance application. Or it may be necessary where we have a genuine business need to use your personal information such as maintaining our business records and keeping records of insurance policies taken out and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm. We may also have a legal or regulatory obligation to use your personal information (e.g. where we are required to collect certain information about our clients for debt recovery purposes, or where we are required to make disclosure to courts or regulators).

## Use of special categories of personal data

In some circumstances, we (and other insurance market participants) may need to collect and use special categories of personal data such as information relating to criminal convictions and offences. Where this is required, unless another ground applies (e.g. lawful basis) we will establish a lawful exemption which will allow us to use that information. This exemption will typically be by obtaining your explicit consent. Where consent to this processing is necessary for us to provide relevant services whilst this consent may be withdrawn at any time, this may mean we are unable to continue to provide services and/or process enquiries and/or insurance applications.

## Disclosure of your personal data

We may pass personal data to third parties such as other intermediaries, administration service providers, legal advisors, banks, regulatory bodies the police and other law enforcement agencies, fraud and crime prevention and detection agencies. If you require details of the third parties your data has been passed to and how this information is used please contact the Data Protection Officer at Hepburns Insurance Services Limited, Crowthorne House, Nine Mile Ride, Wokingham, Berkshire, RG40 3GZ

In order to provide our services, the information you give us will be transferred to our outsourced administration facility in Jersey, Channel Islands. HISL is required to comply with the EU General Data Protection Regulation (GDPR) when handling your personal data. Jersey is not within the European Economic Area (EEA), but has a robust and effective regulatory framework and the Data Protection (Jersey) Law 2018 provides an equivalent framework to GDPR.

Where you are providing us with personal data about a person other than yourself, you agree to provide this notice to them and confirm that you have obtained their consent as outlined here.

## Scope

This policy applies to the operations of HISL and sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed. Please read the following carefully to understand how we will treat your personal information.

## Personal information

- HISL only collects personal information necessary for us to provide you with the services you require (e.g. processing your application or when requesting information about our products and services in relation to a specific insurance product or to initiate a complaint).
- We collect personal information that you submit when you are using our online services, including payment information or application information processed by our outsourced administration service providers.
- Our online data transfer facilities are secure and the data, once collected, cannot be accessed through the Internet.
- When we need to collect personal information we will, in most cases, collect the information directly from you or subject to your consent from another party.
- Your personal information is held in secure environments by HISL, or our outsourced administration service providers who are resident in Jersey.
- If you do not supply the information requested we may not be able to process your application for insurance.

## Cookies

These are small text files sent by a web server to a web browser in order that the web server may identify a computer to the web server. Nearly all websites use cookies for the very least to track traffic flows on the website.

When you visit any Leaders romans Group website we may leave a cookie on your computer in order that your computer will be recognised by our web server. The cookie does not collect personal information it only collects information about what pages you have visited and for how long if you are not a registered user (in these instances we cannot identify the individual user). If you are a registered user it enables us to simplify the 'logging on' process.

To find out more about our use of Cookies and related technologies, please read our Cookie Policy on our website.

## Uses

- HISL will use your personal information for any purpose which you have consented to. We will not use your personal information for any marketing purposes.
- HISL does not share, trade or sell personal information for marketing or any other purposes outside the provision of our insurance services.
- Your personal information will be used in ways that you would reasonably expect, in order for us to provide our insurance services to you.
- In processing your application for insurance we will need to disclose your personal information to our outsourced administration service providers.
- HISL will only disclose your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or if required to do so by any regulatory body or ombudsman or

to any party that provides a service to HISL (e.g. for outsourced administration services purposes).

- Where we disclose personal information to such administration service providers HISL will only allow your personal information to be used for the purposes set out above and we will ensure that it is secure and protected from unauthorised access.

## Security

We take privacy seriously and have systems in place to ensure the security and accuracy of any personal information we collect.

All information you provide to us is stored on our secure servers. We restrict access to your information as appropriate within HISL to those who need to know that information for the purposes set out above.

## Your rights

- You may request access to a copy of your personal information that we hold by contacting us.
- Where we have incorrect personal information in our records you may request to have the information corrected.
- Under certain conditions, you may also have the right to require us to:
  - delete any personal information that we no longer have a legal ground to rely on;
  - object to any processing based on the legal ground of legitimate interests unless our reason for undertaking that processing outweighs any prejudice to your data protection rights;
  - provide you or another provider with a copy of your personal information that you provided us with; and
  - restrict how we use your personal information whilst a complaint is being investigated.

If you contact us to exercise any of these rights we will confirm your right to do so and respond in most cases within 30 days.

- If you have a complaint concerning the processing of your personal data please contact us and we will make every effort to resolve your complaint or refer you to our independent dispute resolution processes. If you are still not satisfied that your complaint has been appropriately addressed you have a right to complain to the Information Commissioner's Office here (<https://ico.org.uk/concerns/>).

## How to Contact us

For any questions or concerns relating to this Privacy Policy or our Data Protection practices, or to make a subject access request, please contact:

The Data Protection Officer  
Hepburns Insurance Services Limited  
Crowthorne House  
Nine Mile Ride  
Wokingham  
RG40 3GZ

## Updates to this Privacy Policy

We may need to make changes to this Privacy Policy periodically, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. You will be provided with a copy of the most up-to-date Privacy Policy and you can also view it by checking our website.

This Privacy Policy was last updated on: 25 May 2018