

Privacy Notice

Birchall Gregory Ltd is an Appointed Representative (AR) of TEn Insurance Services Ltd (TEn).

In accordance with the General Data Protection Regulation (GDPR), we are committed to protecting the confidentiality and security of the information that you provide to us.

This *Privacy Notice* is intended to help you understand how we collect and use your information.

Who we are:

Birchall Gregory Ltd, Bank Chambers, St Petersgate, Stockport, SK1 1AR – stuart@birchallgregory.co.uk – 07545 123133

For the purposes of GDPR, we are the Data Controller.

Why we need and how we use your personal information

We only collect, process, share and store your information where we have lawful grounds and when we have legitimate business reasons to do so. The lawful grounds will normally be in order to provide you with a Contract of Insurance.

We collect, process, share and store personal information to fulfil requests for quotes, products and services as part our insurance broking, claims handling and risk management business. It may also be used to verify your identity, to administer payments and to enable us to carry out anti-money laundering and other financial crime checks where required. Your Insurer, Finance Provider or other firms associated with processing your data may also carry out Credit Checks where necessary.

If you pay by instalments your information may also be used to arrange credit.

We may need to obtain special category personal data from you or about you such as information about medical conditions and any unspent criminal convictions. Our lawful grounds for processing such information is Substantial Public Interest.

If you do not provide the information required, we are unlikely to be able to arrange your insurance and may not be able to do any other business with you.

We may also monitor calls, emails, text messages and other communications with you. When you contact us, we may keep a record of that correspondence and any information provided to us during that or any subsequent communication.

Marketing

We would like to keep you updated about our relevant products and services by email, SMS and/or telephone. If we intend to use your data for such purposes, or if we intend to disclose your information to any third party for such purposes, we will only do so with your consent or where we have legitimate interest to do so.

Your consent will be obtained specifically at the appropriate time if required.

If you have already consented and wish us to stop using your information for this purpose or any other purpose, then please contact us.

Nature of personal information

Personal data is any information that may identify a living individual, including basic contact details of an individual within a corporate client.

Additionally, we may collect personal information such as name, contact details, date of birth, gender, marital status, financial details, employment details and other personal details depending on the nature of the insurance and other services we offer.

We may also collect, use, share and store sensitive personal information such as criminal convictions and medical conditions as necessary in relation to insurances such as motor, home, travel and health insurance. This information may be shared with insurers, insurance product providers and our third-party service providers to effect cover.

Sharing information

We will only supply your personal information to other parties where such a transfer is a necessary part of the activities that we undertake, where you give us consent or where we are required to do so by law or regulation (e.g. where the disclosure is necessary for the prevention and/or detection of crime).

As an intermediary we must disclose personal information to insurance companies, underwriting agencies, business partners and other parties to provide our products and services and to enable you to enter into insurance contracts.

Examples of other parties include other insurance intermediaries, loss adjusters, regulatory bodies, legal and accountancy firms involved in the claims handling process. We may also share your personal information with fraud prevention agencies such as the Claims and Underwriting Exchange Register and Motor Insurance Anti-Fraud and Theft Register. We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents and suppliers.

For motor insurance, we share information with the Motor Insurance Database (MID), which may be used to establish whether a driver is insured to drive a vehicle and/or for preventing or detecting crime. If you are involved in an accident in the UK or abroad, the MID may be searched to obtain relevant policy information. You can find out more at www.mib.org.uk

We may also disclose your information to service providers engaged to perform services on our behalf. Such service providers are contractually restricted from using or disclosing the information we give them except as necessary to perform services on our behalf or to comply with legal requirements.

We share all personal data with TEn Insurance Services Ltd, due to our regulatory arrangements.

We only share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

We may also disclose personal information to new owners of our business if we are subject to a merger or acquisition. Disclosure may also be made to enable company audits, regulatory inspections or to investigate a complaint, suspicion of fraud or a security threat.

We never share your information outside our organisation for external marketing purposes.

You understand that we may disclose the information you provide to relevant other parties for the purposes described in this *Notice*.

Transfer of personal data outside the UK

Certain personal information held on our Information Technology systems may be transferred across geographical borders in accordance with applicable law, and in some cases outside of the UK or European Economic Area (EEA).

Transfers outside the UK or EEA are governed by standard contractual clauses or equivalent data transfer agreements to protect the security and confidentiality of personal information.

How long we keep information about you

We will keep your information for as long as it is required to enable us to provide quotations, administer your insurances, offer renewal and respond to any claims or complaints (which may arise after the period of insurance has expired).

This will usually be a minimum period of seven years or otherwise as determined by law or regulation. Once we decide that we no longer need your information it will be securely and confidentially destroyed.

Your data protection rights

You have certain legal rights under UK data protection law and regulations, summarised as follows: -

- **The right to be informed** about our data processing activities, including through Privacy Notices such as this
- **The right of access** to the personal information we hold about you. To request a copy of this information you must make a subject access request in writing to us
- **The right of rectification.** You may ask us to correct any inaccurate or incomplete data within one month
- **The right to erasure and to restrict processing.** You have the right to have your personal data erased and to prevent processing except where we have a legal obligation to process your personal information. You should bear in mind that by exercising this right you may hinder or prevent our ability to provide products and services
- **The right to data portability.** If we are able, we may be able to provide you with your personal data in a structured format
- **The right to object.** You have rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for direct marketing

If you want to invoke any of these rights, please write to us.

Contact details are available at the end of this *Notice*.

Withdrawal of consent

Where you have provided your specific consent to the use of personal data, you may withdraw that consent by contacting us. Contact details are available at the end of this *Notice*.

How to make a complaint

If you wish to make a complaint about how we hold or use your data, please contact us. Our Complaints Procedure is displayed on our website: www.birchallgregory.co.uk

If you are dissatisfied with how we deal with your complaint, you may contact the Information Commissioner's Office: The Information Commissioner, Wycliffe House, Water Lane, Wilmslow Cheshire, SK9 5AF; Phone: 08456 30 60 60 Website: www.ico.gov.uk

Information from other sources

We may use legal public sources such as the electoral roll and other third-party sources, such as credit reference agencies, to obtain information about you; for example, to verify your identity or check your credit history.

We also obtain information about you from credit reference agencies and similar third parties. Some personal information may be provided to us by third parties such as insurance companies, other insurance intermediaries and motor vehicle licensing authorities.

In some cases, you will have previously submitted your personal information to them and given them approval to pass this information on for certain purposes.

Such information will only be obtained from reputable sources, which operate in accordance with GDPR.

We and/or other parties may use your information for purposes such as statistical and trend research and analysis, which may include computerised processes which profile you. Automatic profiling helps us understand, predict and forecast customer preferences and to improve the products and services we offer and to assess which products might be most suitable for you.

We may amend this *Privacy Policy* from time to time for example, to keep it up to date or to comply with legal requirements. The very latest version of this policy can be found at: -

www.birchallgregory.co.uk

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 or any other request regarding the information we hold, please contact us at: -

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