

### PRIVACY NOTICE



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#### PRIVACY NOTICE

This privacy notice describes how Kruskal Insurance Brokers (KIB) ("we"/"us"/"our") will collect and handle personal information that KIB collects from you, the data subject, in the course of its business and in accordance with the European General Data Protection Regulation (GDPR) 2018 as applied in the United Kingdom in the relevant data protection legislation.

The privacy and security of your personal information is very important to us so we want to assure you that your information will be properly managed and protected by us at all times. Please read this privacy notice carefully as it explains how we may collect and use your personal data.

"Personal Information" is information that identifies you as an individual. By providing your personal information to us, you agree to this privacy notice.

In order for us to provide insurance quotes, insurance policies and to administer any claims or complaints, we may need to share your personal data with insurers and other insurance market participants.

For the purposes of the relevant data protection legislation the Data Controller is Kruskal Insurance Brokers, 31 Princes Park Avenue, London, NW11 0JR, (FCA firm reference 305973).

Kruskal Insurance Brokers are registered with the Information Commissioner's Office; Registration Z546003X.

If you need to contact us in connection with the use or processing of your personal data, then you can do so using our contact details as set out below:

31 Princes Park Avenue, London, NW11 0JR Telephone: 0208 458 9911

#### What data do we collect?

The personal data that we may collect may include:

- Your name, postal address, email address, phone number or other contact details.
- dentification details such as your national insurance number, passport number, driving licence number.
- Bank account or payment card details, credit history or credit score.
- · Previous claims history

We may also need to collect special categories of data to assess the risk being insured and provide a quote. This may include data relating to;

- Criminal offences,
- Health
- Racial or ethnic origin

Where we need to collect any data that is a special category of personal data, we will do so with your **explicit consent**.

Where you have provided your consent, you may withdraw this at any time. However, should you exercise this right, we may not be able to fulfil the insurance services requested by you, your policy may terminate, or you may be unable to make a claim. Should you wish to withdraw your consent to the processing of your personal data, please contact us at the address above.

# How we may collect your personal data

We may collect your personal data from you, your family or employer or from other insurance market participants. We may also collect your personal data from credit reference agencies.

We collect your personal data from you as a controller when we obtain quotations for insurance for you, when we set up your policy for you and when we make changes to your policy for you. This may also involve the collection of data from or about others who are associated with you and your insurance policy such as other persons insured on your policies or your employees or representatives. By giving us information about someone else for the purpose of arranging insurance for them under your policy such as named driver, employee or travel companion etc. you confirm that you have their permission to do so and that you have shared this privacy notice with them.

By asking us to arrange a contract of insurance for you where this involves passing information to us relating to children, you confirm to us that in doing so you are the responsible guardian of the child.

We also collect information from publicly available sources and third-party databases made available to the insurance industry for the purposes of reducing fraud and financial crime as well as any other third-party databases where your personal data may be held, provided such third parties have lawful bases on which to share such personal data with us.

## How we may use your personal data

We will use your personal data for our legitimate business interests and for providing you with the provision of our services which include arranging and providing insurance coverage and administration of an insurance contract to which you are a party. We may also use your data in assisting you to collect any claims that fall due and to process renewal invitations. Your data may also be used to administer your account, including financial transactions for insurance broking.

We will only process your personal data for the purpose of our and your legitimate interests, which are to provide you with a suitable insurance solution.

We may also need to collect special categories of data from you, such as information about health, in order to perform our contractual obligations to you. The lawful basis on which we can do this is that the processing is necessary for reasons of substantial public interest relating to insurance. We may also collect information on criminal convictions which we may share with third parties. The lawful basis on which we can do this is that the processing is necessary for reasons of substantial public interest relating to insurance.

We do not sell any personal data to any third party and will disclose personal data only when required by law. We also do not use personal data for any form of automated processing, decision making or 'profiling' to analyse or predict any personal aspects of performance at work, economic situation, health, personal preferences or interests and behaviour.

## Who we may share your information with

In the performance of our legitimate business interests and in the provision of our services to you, we may need to disclose your personal data to potential insurers or other insurance market participants or credit reference agencies.

In assisting with the collection of a claim, we may need to disclose your personal data to third parties including loss adjusters, claims handlers and solicitors.

In complying with our legal and regulatory obligations, we may also need to disclose your personal data to the Financial Conduct Authority.

#### Your Rights

We will only keep your data for as long as is necessary based on the original purpose for which it was collected or where we are obliged to do so due to legal or regulatory reasons.

The GDPR confers a number of rights on you as the data subject. We have listed these rights below as they appear in the GDPR.

- The right of access: you have a right to access the personal data that we hold about you so that you may verify the lawfulness of the processing of your data that we may conduct. To request a copy of the personal data that we hold, please contact us at the address above.
- The right to rectification: if the personal information that we hold about you is incorrect, you may ask us to amend it.
- The right to erasure: you may request that the personal data that we hold about you be deleted or removed where there is no longer any reason for continued processing of your personal data. For instance, you no longer wish us to provide our services to you.
- The right to restrict processing: you have the right to 'block' the processing of the personal data that we hold where you contest the accuracy of the personal data we hold. You may also request that we restrict processing where you object to our legitimate interests as the basis of the processing of your personal data or you believe continued processing to be unlawful.
- The right to data portability: you have the right, on request, to ask us to provide to you a copy of the personal data that you have previously supplied to us. Forinstance, you no longer wish us to provide our services to you and you wish to transfer to a new service provider.
- The right to object: you have the right to object to the processing of your personal data by us where you can demonstrate that to do so would be detrimental to your interests.
  You may also object and request that we do not process your personal data for any purposes of direct marketing.

#### Your right to complain

In the event that you are not satisfied with our use of your personal data or you believe that we have not upheld your rights as a data subject, please contact us using our details set out at the beginning of this privacy notice.

Should you remain dissatisfied with our response, you have the right to complain to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

# 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.

#### How to contact us

If you have any questions or concerns about this privacy notice or your data protection rights please contact us at Kruskal Insurance Brokers, 31 Princes Park Avenue, London, NW11 0JR or by telephoning 020 8458 9911.

Updated: 9 May 2018