# JN & E Capstick Insurance Consultants Limited

# **Privacy Policy**

## Our Principles for the Privacy of your Information

JN & E Capstick Insurance Consultants Limited respect your privacy and the security of your personal information is important to us. This Privacy Policy Statement describes the ways we collect information from and about you, and what we do with the information, so that you may decide whether or not to provide information to us. By accessing our website, or purchasing our products or services you agree to this Privacy Policy Statement in addition to any other agreements we might have with you. This Privacy Statement does not govern the practices of entities that our Company does not own or control, or entities that do not own or control our company or people that our Company does not employ or manage.

# **Our Collection of your Personal Information**

The information we collect may include your personal information, such as your name, contact information, policy information, financial details, IP addresses, product and service selections..

In addition, we may collect information considered special category data such as details of criminal convictions and health where this is relevant to the services provided.

We collect personal information from you at different points, including but not limited to the following:

- when we correspond with you as a customer or prospective customer;
- when you visit our website;
- when you take out an insurance policy via us; and
- when you contact us for help;

We are a controller of the personal information for the purposes of obtaining insurance quotations for you, when we set up your policy for you and when we make changes to your policy at your request. This may involve the collection of data about other persons who are associated with you and your insurance policy; such as persons insured on your policies or your employees or representatives. By providing this information about other persons for the purpose of arranging insurance for them under your policy, such as a named driver, employee or travel companion, etc., you confirm that you have their permission to do so and that you have shared this Privacy Policy Statement with them.

We collect information from publicly available sources and third party databases for the purposes of reducing fraud and financial crime, provided such third parties have lawful bases on which to share such personal data with us.

Where you ask us to arrange a contract of insurance where this involves providing information to us relating to children, you confirm that you are the responsible guardian of the child.

## **Our Use of your Personal Information**

Our Company may use information that we collect about you to:

- perform our contractual obligations to you and deliver products and services you have requested;
- manage your customer relationship and provide you with customer support;
- perform research and analysis about your use of, or interest in, our products or services;
- communicate with you by e-mail, postal mail, telephone and/or mobile devices about products or services that you may hold with us, may be of interest to you either from us, or other third parties;
- verify your eligibility to credit facilities;
- transfer personal information to third parties for any legally permissible purpose in our sole discretion;
- enforce our terms and conditions; and

We do not sell personal information to third parties.

## Our Disclosure of your Personal Information to Third Parties

We may share your personal information with third parties only in the ways that are described in this Privacy Statement:

- we may provide your information to insurers, intermediaries and third party service providers that we use for the purposes of arranging and administering your insurance policy on your/our behalf;
- we may provide your information to our service providers who perform functions on our behalf such as IT services, finance providers, claims handling and other support services. Usually our service providers sign a standard service and / or confidentiality agreement in such cases;
- we may share your data with any parent company, subsidiaries, joint ventures, other entities under a common control or third party acquirers. We would direct these other entities will honor this Privacy Statement;
- we may allow a potential acquirer or merger partner to review our databases, although we would restrict
  their use and disclosure of this data during the diligence phase and direct them to treat the data
  confidentially;
- as required by law enforcement, regulatory bodies, government officials, or other third parties pursuant
  to a court order, or other legal process or requirement applicable to our Company; or when we believe,
  in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm
  or financial loss, to report suspected illegal activity or to investigate violations of our agreements or
  Company policies; and
- other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries outside of the UK and the European Union where the laws on processing personal information may differ. We will only do so where we are satisfied that sufficient levels of protection are in place as required by applicable data protection laws.

#### **Our Security Measures to Protect your Personal Information**

Our systems have security measures in place to help protect information under our control from the risk of accidental or unlawful destruction or accidental loss, alteration or unauthorised disclosure or access.

#### **Our Use of Links**

We may create links to other web sites. We will make a reasonable effort to link only to sites that meet similar standards for maintaining each individual's right to privacy. However, many other sites that are not associated with or authorized by our Company may have links leading to our site. Our Company cannot control these links and we are not responsible for any content appearing on these sites. Since our website does not control the privacy policies of third parties, you are subject to the privacy practices of that third party. We encourage you to ask questions before you disclose any personal information to others.

# **Your Rights**

We will retain any personal information only for as long as is necessary to fulfill the business purpose it was collected. We will also retain and use your personal information for as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. You can make a request for us to:

- Provide copies of your personal information
- Rectify personal information you think is inaccurate
- Restrict or erase your personal information (in certain circumstances), and you can object to the
  processing of information where the process forms part of our public tasks or is in our legitimate
  interests, such as automated decision making or profiling
- Transfer the information you gave us to another organisation, or to you, in an accessible and machine readable format

You are not required to pay any charge for exercising your rights. We have one month to respond to you.

In some cases, where you make a request concerning your personal information we may not be required or able to carry out your request as this may result in us not being able to fulfil our legal and regulatory obligations under the lawful processing conditions in which we hold your data or because there is a minimum

statutory period of time for which we have to keep your information. In such cases, we will inform you of our reasons.

### **Changes to our Privacy Statement**

We reserve the right, at our discretion, to amend this Privacy Policy Statement at any time. Please read this carefully and re-visit the Policy from time to time to review any changes that may have been made.

# **Contacting Us**

If you have any questions about this Privacy Statement, our practices or have any concerns, please contact David Capstick at our Kirkby Stephen office.:

Email: david@capstickinsurance.co.uk

Telephone: 017683 72285