

## **PRIVACY POLICY**

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Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information you have given us.

This version of our Privacy Policy was last updated 3<sup>rd</sup> May 2018.

### **How to contact us**

FAO Data Protection Officer, 77a High Street, East Grinstead, West Sussex, RH19 3DD

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

### **Information we collect and use**

Information about you that we collect and use includes:

- Information about who you are e.g. your name, contact details and possibly where relevant date of birth.
- Information connected to your product or service with us e.g. what you, sums insured.
- Information about your contact with us e.g. meetings, phone calls, emails/letters.
- Information that is automatically collected e.g. via cookies when you visit our website.
- Information classified as 'sensitive' personal information e.g. relating to any convictions, ccj's bankruptcies and so forth. This information will only be collected and used where it's needed to provide the product or service you have requested or to comply with our legal obligations
- Information you may provide us about other people e.g. business partners.

### **What are cookies?**

A cookie is a small file – it's saved onto your computer or other device when you visit our website.

Cookies store small pieces of information. For example – they will remember you've visited our website or performed a certain action.

We use cookies to help us improve your experience when you visit our website. For example, a cookie might store information so you don't have to keep entering it.

Cookies also let us know which pages of our website you visited; they help us develop and market our products and services.

### **Where we collect your information**

We may collect your personal information directly from you, from a variety of sources, including:

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- an application form for a product or service
- phone conversations with us
- emails or letters you send to us
- our online services such as websites and social media

We may also collect personal information on you from places such as business directories and other commercially or publicly available sources like websites or Facebook, e.g. to check or improve the information we hold (like your business activities) or to give better contact information if we are unable to contact you directly.

### **What we collect and use your information for**

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- you have given us your permission (consent) to send your information about products and services offered by us
- it's necessary to provide the product or service you have requested
- it's necessary for us to meet our legal or regulator obligations e.g. to tell about changes to our Terms of Business Agreement or for the detection and prevention of fraud
- it's in the legitimate interests of G M Imber & Sons Ltd e.g. to deliver appropriate information and guidance so you are aware of the options that will help you get the best outcome for you and your business; where we need to process your information to better understand you and your needs so we can send you more relevant communications about the products you have with us and to develop new products and services.
- it's in the legitimate interests of a relevant third party

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our products and services.

### **Who we may share your information with**

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for'.

These third parties include:

- Companies we have chosen to place your cover with (Insurance Companies) or obtain quotes from, our Lloyd's broker.
- Our regulators and Supervisory Authority e.g. the Financial Conduct Authority (FCA), the Information Commissioner's Office for the UK (the ICO) and any auditors.

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- Law enforcement, credit and identity check agencies for the prevention and detection of crime.
- Companies who require the information so they may assist you with a claim or survey.
- Furthermore, Insurer's may also provide your details to their reinsurers and any relevant companies or bodies

We will never sell your details to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.

#### **Where your information is processed**

All of your information is processed in our office or by third parties e.g. your insurer, who operate within the UK and/or the European Economic Area (EEA).

#### **How we protect your information**

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake annual training on this.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

#### **How long we keep your information**

We will keep your personal information only where it is necessary to provide you with our products or services while you are a customer.

We may also keep your information after this period but only when required to meet our legal or regulator obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

#### **Your individual rights**

You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with – we do this in our Privacy Policy and privacy notices.

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### **Right of access**

You have the right to your personal information. If you wish to have a copy of the personal information we hold on you, you may make a data subject access request (DSAR).

### **Right to request that your personal information be rectified**

If your personal information is inaccurate or incomplete, you can request that it is corrected.

### **Right to request erasure**

You can ask for your information to be deleted or removed if there is not a compelling reason for us to continue to have it.

### **Right to restrict processing**

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.

### **Right to data portability**

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we have to another company in a safe and secure way. For example, if you were moving your insurance to another insurance provider.

### **Right to object**

You can object to G M Imber & Sons Ltd processing your personal information where: it's based on our legitimate interests (including profiling); for direct marketing (including profiling); and if we were using it for scientific/historical research and statistics.

### **Rights related to automatic decision making including profiling**

- We do not currently use automated decision making.

### **How to make a complaint**

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy please contact us by phone or by email stating that you would like to make a complaint and we will do our utmost to make things right.

If you are still unhappy, you can complain to the Information Commissioner's Office (ICO).

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