

# HOW WE PROTECT YOUR PERSONAL INFORMATION

## PLEASE READ THIS CAREFULLY

### 1. What Data do we collect and where do we get it from?

For the purposes set out in this notice, the Information Commissioner (ICO) requires us to advise you that, information including personal information detailed below relating to you or anyone else to be covered by an insurance policy (Personal Data and Special Categories of Data) will be collected and processed by Avon Associates Limited. This data will be provided by you, or any other person you may appoint to provide us with information. You will either be completing application forms or answering questions we ask you, in order to provide the required information. We may also obtain information from other sources that is readily available in the public domain such as the Internet of Things (IOT).

#### **Personal Data**

This is information we may gather from you that will directly or indirectly identify you as an individual, and may also provide information about your cultural or social identity. This type of data must be processed strictly in accordance with our Basis at Law stated below. This data will include but may not be limited to:-

**Your title, name, postal address, risk address, civil status, gender, current and or previous occupation, date of birth, contact details, registration number, mental health conditions, bank details, credit/debit card details, credit searches.**

#### **Special Categories of Data**

This is information we may gather from you that might reveal your racial or ethnic origin, political opinions, religious or philosophical beliefs, your health. This data will be processed strictly in accordance with the Basis at Law stated below. This data will include but may not be limited to:-

**Your title, gender, race, ethnic origin, political opinions, religious beliefs, physical or medical health conditions, driving licence origin, UK residency period, criminal history. Data for criminal convictions and offences will only be collected as permitted by UK Law.**

Each time you visit our website, we may automatically collect Technical Information including IP address.

The controller of this Personal Data is Avon Associates Limited of 21 High Street, Keynsham, Bristol, BS31 1DP. **If you have any query, please contact Julian Hellyer (julian@avon-associates.co.uk). We process your Personal Data in accordance with this Privacy Notice.**

### 2. How and why do we Process Your Personal Data?

The following table details:-

- Why we collect your data and the consequences of not providing it
- Our legal basis as required by the regulations
- Who we share your data with and why
- How long we will retain your data

#### **Legal basis for processing**

#### **Why we collect your data**

We obtain, collect and process your Personal Data and Special Categories of Data (which includes sharing your data with others) to enable us to quote for your insurance needs, place you on cover, make any payments arrangements requested, make any alterations to your policy that you may request during the policy term, and in the unfortunate event that a claim occurs we will need to share your information to help you make your claim. We may also have regulatory and/or legal obligations for sharing data with others, but we will only share it for the purposes stated, or in a way you would reasonably expect us to, unless we inform you otherwise. If you do not provide the data requested it may not be possible to obtain a quote or provide you with a policy.

#### **Our legal basis for processing**

In order to arrange your insurance we will be using one or more of the following legal basis:-

- Processing is necessary in order for us to take steps, at your request, to enter into a contract of insurance when you ask us to place cover, and for the performance of that contract when you need to make a claim
- Processing is necessary for us to comply with a legal or regulatory obligation
- Where we believe a customer is vulnerable, processing might be necessary to protect the vital interests of that person or other persons covered by the policy
- We may have a legitimate interest in processing the data for changes to any quotation or policy which you may request, or for any other reason necessary to undertake any other requests related to your insurance policy

### **Who we share your data with and the reason for processing**

We are a Data Controller and in order to process your requests we may be sharing your data with one or more other Data Controllers. The Controllers we may share with and our reasons for sharing that information are listed but not limited to the following:-

Insurers	Quotation, cover, to manage and process claims
Insurance Providers (placing brokers, wholesalers and the like)	Quotation, cover, to manage and process claims
Loss Adjustors	To manage and progress claims
Insurance Fraud Bureau	Potential policy fraud
Loss Assessor	To manage and process claims
Financial Conduct Authority	Regulatory obligations
Financial Services & Compensation Scheme	Compensation in the event of insurer failure, if eligible
Financial Ombudsman Service	Unresolved complaints, if eligible
National Crime Agency	Suspected criminal/fraudulent activity
HM Treasury Sanctions	Checking clients are not on the banned list
Premium Finance Company	Payment of premiums
Police	Legal obligations
Possible Suppliers	Insurers replacement facilities – ie white goods, jewellers, cleaning companies, restoration companies, approved repairers and garages, windscreen replacement company, plumbers, builders, electricians and the like
Staff	Administering the quotation and policy, claims or payments, back up of data
Claims Management Company	To manage and progress claims
Surveyor	Risk survey to analyse, report upon risk, Also in the event of a claim
IT Providers – Software	Holds all collective management information, system testing when system not responding or errors occur
IT Providers – Hardware	To detect issues, secure the system and test the system
Cloud & Systems Management	Backup of data
Interested Parties (mortgage lender)	Proof of cover
Third Party Insurers	To manage and progress claims
Third Party Assessor	To manage and progress claims
Claims Management Company	To manage and progress claims
Credit Reference Agencies	To obtain competitive premiums via some Insurance Providers
My Licence (UK)	To meet legislative requirements
DVLA	To meet legislative requirements
Motor Insurers Database	Registering vehicles to meet legislative requirements
Motor Insurance Bureau	To meet legislative requirements
Claims Underwriting Exchange	Sharing of previous claims information between Insurers
Employers Liability Tracing Office	To provide confirmation of cover being in place
Our own Insurers	Where we need to provide information about you
Solicitor	Claims against clients or claims against us
Interpreter	For management of the policy and claims where language is a barrier or sign language required
Other Data Controllers not detailed above	To be shared only for the purposes stated, or in a way you would reasonably expect us to, unless we inform you otherwise

### **How long we retain your Data**

We will retain your Personal Data for as long as your insurance policy is valid and for 20 years thereafter

## IMPORTANT

- We have stated the reasons we are collecting your data above, but in the event that you do not wish to provide us with your Personal Data for all or any of the above reasons, this may limit the Insurers who will quote and agree to cover, and in some cases Insurers may not wish to offer cover at all
- If at any point in the future we need to amend this policy, every effort will be made to make you aware and our website will always have the latest version

### 3. Where do we hold your Data?

At all times we will endeavour to hold your Data on servers within the UK, or within the European Economic Area (EEA). Where we share your information with other Data Controllers they must also agree to hold your Data within the EEA. However, in the unlikely event your data is to be held in any other geographical area we ensure that:-

- Data Controllers do not do so without our prior written authority and
- An appropriate transfer agreement is put in place to protect your personal data

### 4. Your Acknowledgment of this Notice and Your Rights

Under General Data Protection Regulation you have rights and these are listed below.

#### Right to be informed

The General Data Protection Regulation sets out the information we must provide to you about your Data. All of the information we are required to give you is contained within this Privacy Notice. If you do not understand any part of this you should contact us immediately and we will be happy to explain it to you

#### Right of Access

You have the right to access and obtain a copy of the Personal Data, and any supplementary information that we hold about you to enable you to verify the lawfulness of the processing carried out. This will be provided free of charge, unless your request is unfounded, excessive or repetitive, and information will be sent to you within 30 days of your request being received. If we refuse your request, you have the right to complain to the ICO

#### Right to Rectification

You have the right to request that we correct any inaccuracies in the Personal Data we hold about you. This will be corrected within one month. If we are unable to correct the inaccuracy you have the right to complain to the ICO

#### Right to Erasure

You have the right to request that we erase your Personal Data. For example, you may exercise this right in the following circumstances:-

- Your Personal Data is no longer necessary in relation to the purposes for which they were collected or otherwise processed by us
- You withdraw consent and no other legal ground permits the processing
- You object to the processing and there are no overriding legitimate interests for the processing
- Your Personal Data was unlawfully processed: or
- Your Personal Data must be erased for compliance with a legal obligation

We refuse the right to delete your information when it falls within our data retention period stated above, as this data may be required to exercise or defend litigation in the event of a claim whether covered or not by the insurance policy. If you do not agree with this you have the right to complain to the ICO.

#### Right to Restrict Processing

You have the right to restrict our processing of your Personal Data where any of the following circumstances apply, although we will still be allowed to store it:

- Where you feel that the Personal Data which we hold about you is not accurate. Processing will be restricted until you verify the accuracy of the information
- Where the processing is unlawful and you do not want your Personal Data to be erased and request the restriction of its use instead
- Where we no longer need to process your Personal Data but the data may be required to establish, exercise or defend a legal claim
- Where you have objected to our processing of your Personal Data pending the verification of whether or not your legitimate business interests override your interests, rights and freedoms

Where you exercise your right to restrict our processing of your Personal Data, we will only continue to process it in accordance with the requirements of this policy or our legal obligations.

## Right to Data Portability

You have a right to receive and transfer the Personal Data that we hold about you. This only applies to:-

- Personal data you have provided to us
- Where the data was processed by you giving us your individual consent or for the performance of a contract
- And where processing was carried out by automated means

Where you make such a request, this will be provided in a structured, commonly used, machine readable format such as a CSV file or PDF. This will be completed within one month of us receiving your request.

## Right to Object to Processing

In certain circumstances, you have a right to object to our processing of your Personal Data

- Where we have processed it as legitimate interest (including profiling)
- Direct Marketing (including profiling)
- Processing for scientific/historical research statistics

We will still be able to process your Personal Data where

- We can demonstrate compelling legitimate grounds for us to process your Personal Data which override your interests, rights and freedoms
- The processing is for establishment, exercise and defence of legal claims

## Right to Object to automated decision making including profiling

You have a right not to be subjected to decisions being made solely by automated means without any human involvement. This might be the case where quotations are obtained online.

We will still be able to carry out this type of decision making where:-

- It is necessary to enter into or for the performance of a contract (such as a contract of insurance) which is the main reason we would use this type of decision making or
- You have given your explicit consent for us to do so

We will only process data in the way you would expect it to be used, and you will be entitled to have a person from our firm to review the decision so that you can query it and set out your point of view and circumstances to us.

If you would like to exercise any of your rights detailed above, please contact Julian Hellyer

You may raise concerns about Avon Associates Limited processing of your Personal Data with the Information Commission Office on <https://ico.org.uk/>.

## 5. Changes to this Notice

We may amend this notice on occasion, in whole or part, at our sole discretion. Any changes to this notice will be effective immediately upon sending the revised notice to you by e-mail or post. If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you by e-mail or post and you will have a choice as to whether or not we use your information in the new manner. If you have questions or concerns about this notice, please contact Julian Hellyer ([julian@avon-associates.co.uk](mailto:julian@avon-associates.co.uk)).

## 6. Information about or provided by another person

Where your information for your policy has been provided to us by another person, we will send a copy of this Privacy Notice directly to you, where we have your address, within one month of your policy being taken out. If we do not have/are unable to hold your address for any reason, we will send a copy of this to the person arranging the insurance with instructions to pass this to you within one month. Where you have taken out a policy and provided us with information about another person, eg: an additional driver to your motor policy it is unlikely we will have their address, and therefore you must provide them with a copy of this Privacy Notice so that they will know how their data is being used. Additional copies can be supplied on request.

**MAY 2018 – VERSION 1**

