
Privacy Statement



BLACKMORE BORLEY
BESPOKE BROKERS

Our Privacy Notice

This notice covers our requirement to provide you with information on how and why we use your personal data and your rights under the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

Personal Information

This privacy notice tells you what to expect when Blackmore Borley Limited collects personal information about you.

Personal Information denotes:

- Information you provide us with by filling in online forms or online questionnaires via our website
- Information you provide us with by completing a proposal form
- Information that you provide us with over the telephone, via email or face to face By providing us with information about yourself, you

are considered to be a Data Subject.

The Data Protection Principals

As we are responsible for gathering and using your personal information, we have to follow strict rules called the data protection principles. As such, we must make sure that your information is:

- ✓ Used fairly and lawfully in a transparent manner
- ✓ Used for explicit and legitimate grounds only
- ✓ Used in a way that is adequate, relevant and not excessive
- ✓ Accurate and kept up to date
- ✓ Kept for no longer than is absolutely necessary
- ✓ Handled according to your rights
- ✓ Kept safe and secure
- ✓ Not transferred outside the European Economic Area without adequate protection

Who Is Responsible For Your Personal Information

Blackmore Borley Limited, as the Data Controller determines the purposes for which and the manner in which any personal data is, or is to be, processed.

Data Controllers must ensure that any processing of personal data for which they are responsible complies with the Act.

Why We Gather Personal Information About You

Blackmore Borley Limited provide a range of insurance products. We process data provided by you (the Data Subject) and other sources in order to deliver the appropriate products and services to you.

The reasons for processing your data is mainly to:

- ✓ Provide you with a quotation for insurance
- ✓ Arrange and administer your policy if you buy one through us
- ✓ Arranging premium credit if required
- ✓ Inform you about our products and services

We do not collect more information than we need to meet our obligations to you and will not retain it for longer than is necessary.

Some of the personal information we ask you to provide us with may be sensitive (special category data). For example, if you want us to provide you with car insurance, we may need to know about any motoring offences that you and other people who will be insured to drive your car may have. We are allowed by legislation to collect such information for insurance purposes without specific consent but it will only be used for the purposes we have set out above.

We will only ever use your personal information for the purpose of progressing your application for insurance, administering your insurance policy, or fulfilling our legal or regulatory requirements such as fraud prevention, help preventing financial crime and audit purposes.

If you provide us with information about another person, in doing so, you confirm that they have given your permission to provide it to us and that we may use their personal data in the same way as your own as set out in this Privacy Notice.

Legal Basis For Processing Your Personal Information

We are required to have a lawful basis in order to process your personal data and the relevant bases which apply:

Purpose of Processing	Lawful Basis
Providing quotations, arranging and administering insurance policies	Necessary for the performance of an insurance contract
Arranging Premium Credit	Necessary for the performance of an insurance contract
Provision of information on products and services	Our legitimate interests or your explicit consent
To notify you of changes to our service	Our legal and regulatory obligations
To prevent and detect fraud, money laundering and other financial crimes	Our legal and regulatory obligations
To meet general legal or regulatory obligations	Our legal and regulatory obligations

Who Do We Share Your Details With and Why

To meet our regulatory obligations and our obligations to you, we may therefore need to share your personal information with product and service providers such as insurers and underwriters, insurance industry databases, premium finance companies, regulatory authorities, the Police and other law enforcement bodies.

To provide you with some types of insurance such as Professional Indemnity, we may need to share your personal information with our associated companies of Randell Dorling Limited and / or Warranty & Indemnity Limited.

Automated Decision Making And Profiling

If you use our online Quote and Buy systems we carry out automated decision making to decide whether we can provide insurance to you and at what price.

This may be classed as 'profiling' under the current legislation.

We are required to have safeguards in the event that this may have a legal or significant effect on individuals. We do not consider that our Quote and Buy systems pose such risks but you are able to request further information should you wish.

Data Retention

The type of insurance we arrange for you dictates the amount of time we retain your personal information for. For the majority of insurance products, we retain records for a period of 7 years after your insurance contract with us expires. For insurance which includes Employers Liability then we retain records indefinitely and for other liability related insurance products, we retain records for a period of 12 years after your insurance contract with us expires.

Marketing

If you are an existing customer, we may contact you by email, text, telephone, mail or by other agreed means to keep you up to date about our products or services. In other circumstances, we can only do so with your explicit consent.

In either case, you are able to opt out of receiving such communications at any time.

Security

We are committed to protecting the security and privacy of all personal information which we obtain and hold about you.

We employ appropriate technical security measures to protect your personal information and ensure that it is not accessed by unauthorised persons. Information is stored on secure computers, in a locked information centre, and information is encrypted wherever possible.

Where Your Information Is Stored

Information which you provide us with is stored on a computer located in the European Economic Area (EEA). This is necessary in order to process the information and to send you any information you have requested. In addition, if you use our Services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those Services.

If You Send Us An Email

Any email you send to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

If You Make A Complaint to Us

If we receive a complaint, we make up a file containing the details of the complaint. The file is likely to contain the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to investigate and process the complaint.

We usually have to disclose the complainant's identity to whomever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We also usually have to disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer.

We may also be required to provide a copy of the file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint.

We are required to disclose high-level analytics to the Financial Conduct Authority (FCA) concerning the number and nature of any complaints we receive. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 3 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Use of Data Processors

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Your Rights

You have rights as an individual which you can exercise in relation to the information we hold about you.

Please ask us for an explanation of each should you wish to have more information:

- ✓ The right to be informed
- ✓ The right of access
- ✓ The right to rectification
- ✓ The right to erasure
- ✓ The right to restrict processing
- ✓ The right to portability
- ✓ The right to object
- ✓ Rights to automated decision and profiling

Your Right To Access

You have the right to access any information we hold about you, and the right to know why that data is being processed, how long it's stored for, and who has had or has access to it.

You will not be charged for us supplying you with this information however we do reserve the right to apply a reasonable fee where requests are deemed excessive.

We will respond to any such request within the maximum time frame allowed of one month.

How To Contact Us

For further information on how your information is used, how we maintain the security of your information and your rights to access the information we hold on you or if you would like to make a complaint, you can write to us, email us, or call us as follows:

Peter Blackmore Blackmore Borley Limited 37 – 39 Lime Street London
EC3M 7AY

Tel: **0207 929 4616**

If You Have A Complaint

If you have any concerns about your rights and our practices in relation to data protection, please contact us directly using the details provided above. We will aim to respond to your concerns and clarify how we have processed your information and with whom. We will also endeavour to put right anything that's gone wrong.

If you are still dissatisfied after contacting us, you may report your concern to the Information Commissioner's Office by contacting them as follows:

Information Commissioner's Office Wycliffe House
Water Lane Wilmslow Cheshire SK9 5AF

Tel: **0303 123 1113**

Website: www.ico.org.uk