

# Privacy Policy

## Introduction

Your privacy is important to Porticus Insurance Consultants Limited and we are committed to respect and protect your privacy and your personal information. This privacy policy tells you what you can expect us to do with personal information we hold on you, what kinds of information we hold, how we receive it and who we receive it from. It explains who else we may share your information with, and gives you details about your data rights and how you may use them. It also describes how we comply with relevant legislation including the Data Protection Act 2018 and the EU General Data Protection Regulation.

This privacy policy is updated from time to time, to reflect any changes in how we use and handle personal information. This privacy policy was last updated on 11<sup>th</sup> November 2020.

## Who Does this Privacy Policy Relate to?

This privacy policy relates to the following types of individuals, where we hold your personal information:

- Individuals who are customers, including prospective customers who have received an insurance quotation, former customers who have previously held an insurance policy with us, and customer representatives, for example those with power of attorney;
- Visitors to our websites;
- Individuals who contact us with a query, concern or complaint;
- Individuals named on our insurance policies;
- Individuals who request information from us or permit us to contact them for marketing purposes.

There are types of individuals who this privacy policy does not relate to, for example Porticus employees and sub-contractors (including prospective and former employees and sub-contractors), employees of our current, former or prospective business partners and service suppliers, and members of the press.

If you are one of these individuals and would like further information on how we collect, use and store your data, please contact our managing director, Bill Baker at:

Unit 3 Turnham Green Terrace Mews, Turnham Green Terrace, London, W4 1QU

Telephone 020 8400 2799

[bill@porticusinsurance.com](mailto:bill@porticusinsurance.com)

## Who we are?

Porticus Insurance Consultants Limited is an independent insurance intermediary. We are classed as a Data Controller which means we are responsible for deciding how your personal data will be processed.

## What information we collect and how we use it

We collect your information and use it in different ways depending on your relationship with us and how you have interacted with us. This can include information we share with or receive from other third parties.

We use your information for the following lawful reasons:

**To enter into or perform a contract:** for example, to provide an insurance quotation, to arrange and administer your insurance including making any changes, renewing your policy, cancelling your policy answering queries and to action your requests.

This information may also include sensitive (special category) data such as your medical history and conditions or criminal records which we can collect on grounds of substantial public interests to provide you with a quotation and/or arrange your insurance. If you give us information about another person in doing so you are confirming that you have their permission to do so and that we may use their personal data in the same way as we will use yours.

**To comply with a legal obligation:** for example the rules set by our regulator the Financial Conduct Authority (FCA) and also The Financial Ombudsman Service, to fulfil your data rights under data privacy laws, handle complaints about data privacy or our insurance products and services and to comply with other legal requirements.

**For yours and our legitimate interests:** for example to detect and prevent fraud, money laundering and other financial crimes, monitor and improve our business and our products and services, demonstrate compliance with applicable laws and regulations, handle legal claims, respond to other types of complaint not previously mentioned, and sending you postal direct marketing communications.

Where we rely on this lawful reason, we assess our business needs to ensure they are proportionate and do not affect your rights. In some instances, you also have the right to object to this kind of use. For more information, visit the “Your data rights” section of this policy.

**With your consent:** for example by sending you email marketing communications, when you ask us to provide you with information, when you give us your details, where we have obtained your contact details in the course of a sale, when you ask us to contact you for email marketing purposes and have not opted out of marketing messages. You can withdraw your consent at any time, for more information please visit the “Marketing” section of this policy.

**To protect vital interests:** in extreme or unusual circumstances, we may need to use your information to protect your life or the lives of others.

## When we collect your personal data

We collect personal data from you when:

- You request an insurance quotation from us;
- When you are named on the insurance policy of another individual, for example as a named driver on another individual’s policy;
- You purchase, change or cancel an insurance policy;
- You renew your insurance policy;
- You contact us to request information or to make a complaint;
- You visit our website;
- You have given permission to other companies to share your information with us;
- You have made your information publicly available, and we have a legitimate reason to review it.

We also collect your information from other third-party sources where we have legal grounds to do so. These include anti-fraud and

crime-prevention agencies, credit reference and vetting agencies, and other data providers.

## What Information we use and hold about you

Depending on your relationship with us, we may hold the following types of information about you:

- Identity and contact data: for example, your name, date of birth, postal address, telephone number and e-mail address.
- Payment and account data: for example, your bank account details, credit/debit card details.
- Correspondence data: for example, copies of letters and e-mails we send you or you send to us, and notes or call recordings of any telephone conversations.
- Internet data: for example, information collected by cookies and other online technologies such as Facebook pixels and Google Analytics, as you use our website or contact us by online methods.
- Information we obtain from other sources: including credit agencies, anti-fraud and other financial crime prevention agencies and other data providers. This can include demographic data and interest-based data.
- Complaint data: for example, what the complaint was, how we investigated it and how we resolved it, including any contact with the Financial Ombudsman Service or other third party adjudicator services.
- Information disclosed to the insurers of the policy and their assistance and claims handlers.

Some of our processes combine different sets of information we hold. This can include combining different data sets we have about you or combining your information with that of other individuals.

## Who we share your data with

Where applicable, we share your personal information with the following types of third parties when we have a valid reason to do so:

- Insurers, underwriters and other companies for the purpose of arranging and administering your insurance and for handling claims;

- Where you have opted to pay your insurance by instalments with our Premium Finance Partner
- Law enforcement, government bodies, regulatory organisations, courts and public authorities, for example the Financial Conduct Authority (FCA), The Financial Ombudsman Service, The Information Commissioner's Office (ICO), Police and HMRC;
- Personal representatives appointed by you to act on your behalf;
- Media agencies and other marketing organisations that we conduct marketing activities through;
- A third party where disclosure is required to comply with legal or regulatory requirements.

## Other third parties

Other third parties including claims handling and assistance service providers may share personal information that you have disclosed to them, with us for the purposes of administering your policy. If you refuse disclosure of data to a third party which prevents the insurer from providing cover, the insurer may be released from any liability for any claim.

## Transferring data internationally

Data protection law places restrictions on transferring personal data outside of the United Kingdom (UK) and the European Economic Area (EEA). The EEA consists of the member countries of the European Union (EU), along with Iceland, Liechtenstein, Norway and Switzerland, and who are all considered to have appropriate data protection laws to safeguard your privacy and protect your rights.

We may need to transfer information to our service suppliers in countries outside the UK and the EEA. If we do, we will ensure that your information is properly protected. If the laws of the country where our supplier is based are not considered equivalent to those in the UK or the EEA, we will ensure that the service supplier enters into a formal legal agreement that reflects the standards required.

## Marketing

We will only send you marketing information regarding our own products and services and those from trusted third parties.

If you no longer wish to receive postal and/or email marketing communications from us, you can request us to stop by:

- Emailing us at [bill@porticusinsurance.com](mailto:bill@porticusinsurance.com)

Writing to us at Managing Director, Porticus Insurance Consultants Limited, Unit 3 Turnham Green Terrace Mews, Turnham Green Terrace, London, W4 1QU

- Calling us at 020 8400 2799

If you do choose to stop receiving marketing communications from us, we will ensure that you do not receive such material going forward, unless you change your mind and specifically request it in the future.

## Your data rights

Data protection law gives you rights relating to your personal information. This section gives you an overview of these and how they relate to the information you give us.

The UK supervisory authority for data rights, the Information Commissioner's Office (ICO), has also published detailed information about your rights on their website: [www.ico.org.uk](http://www.ico.org.uk).

### **Your right to access**

You have a right to request copies of the personal information we hold on you, along with meaningful information on how it is used and who we share it with.

This right always applies, but there are some instances where we may not be able to provide you with all the information we hold. If this is the case, we will confirm why we are unable to provide it - unless there is a valid legal reason that means we cannot let you know why.

### **Your right to rectification**

If information we hold is inaccurate or incomplete, and this has an impact on the way we are using your data, you have the right to have any inaccuracies corrected and for any incomplete data to be completed.

If you ask us to rectify your information, we will either confirm to you that this has been done, or if there is a valid reason that this cannot be done, we will let you know why.

### **Your right to erasure (the right to "be forgotten")**

You have the right to request that your personal information is erased.

If you ask us to erase your information, we will either confirm to you that this has been done, or if we are unable to delete it, let you know why and also inform you how long we will hold it for. For more information, see the "[Retention Policy](#)" section of this policy.

### **Your right to restrict processing**

You can ask us to restrict the use of your information.

If you ask us to restrict your information, we will either confirm to you that this has been done, or if we are unable to restrict it, we will inform you why.

### **Your right to object to direct marketing**

You can object to receiving direct marketing from us.

If you do so, we will ensure that you do not receive such material going forward, unless you change your mind and specifically request it in the future. For more information, see the "Marketing" section of this policy.

### **Your right to object to automated decision-making**

You can object to decisions made about you using your information and undertaken by purely automated means.

If you do so, we will arrange for someone to assess the automated decision and confirm the outcome of this assessment to you.

### **Your right to object to processing**

You may object to our processing of your personal data pursuant to this privacy policy. Please contact us providing details of your objection.

### **Your right to object to the use of your information for statistical purposes**

You can object to us using your information for statistical purposes in some instances.

If you do so, we will either confirm to you that the processing has stopped, or there is a valid reason for the processing to continue, we will inform you why.

### **Your right to challenge our legitimate interests**

You can challenge the use of your personal data where we use a legitimate business interest as a lawful basis to process your

information. You can find more information on when we use this lawful basis in the “lawful ways we use your data” section of this policy.

If you do so, we will either confirm to you that the processing has stopped, or there is a valid reason for the processing to continue, we will inform you why.

### **Your right to data portability**

You have the right to request that your information be compiled into a common, machine readable format and either provided directly to you or sent by us to a third-party you nominate.

If you request this, we will either act upon your instruction and confirm to you that we have done so, or if there is a valid reason that this cannot be done, we will tell you why.

### **Your right to complain**

If you have a complaint about how we use your personal information please contact us by email at [bill@porticusinsurance.com](mailto:bill@porticusinsurance.com)

Or by post:

Porticus Insurance Consultants Limited

Unit 3 Turnham Green Terrace Mews

Turnham Green Terrace

London

W4 1QU

Or calling us at 020 8400 2799

If you remain unhappy with our response you may raise a complaint with a supervisory authority responsible for data protection and privacy.

In the UK, the supervisory authority is the Information Commissioner’s Office (ICO), who can be contacted using the following details:

By e-mail: [casework@ico.org.uk](mailto:casework@ico.org.uk)

By telephone: 0303 123 1113

By post: The Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

### **Exercising your data rights**

You can exercise any of your data rights by contacting us at:

Porticus Insurance Consultants Limited

Unit 3 Turnham Green Terrace Mews

Turnham Green Terrace

London

W4 1QU

## Retention Policy

We will only retain data for as long is necessary for the purposes for which it is being processed and in line with our data retention policy. In most cases this will be a maximum of 7 years from the expiry of an insurance contract.

## Linked websites and information security

We are committed to protecting the online privacy of visitors to our website. We have implemented security policies, rules and technical measures to protect your personal data from unauthorised access; improper use or disclosure; unauthorised modification; and unlawful destruction or accidental loss.

Our web site may contain links to other websites. We have no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites we provide links to from our website. Linked websites are subject to their own policies. You should read any linked website Privacy Policy before submitting any personal information to them.

## Email security

If you contact us by email you should be aware that emails are not secure unless they have been encrypted. We cannot accept any responsibility for the unauthorised access to your data that is beyond our control.

## Cookies

Porticus uses cookies on our website. A cookie is a small file which asks permission to be placed on your computer's hard drive. Once

you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs.

We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. This may prevent you from taking full advantage of the website. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).