



Clegg Gifford Privacy Notice

Data Controller: Clegg Gifford & Co Limited, 7 Eastern Road, Romford, Essex RM1 3NH
The Compliance Department
Contact for queries: Address: Clegg Gifford & Co Limited, 7 Eastern Road, Romford, Essex RM1 3NH
Telephone: 01708 971 000
Email: DPA@cginsurance.com

About Us

Clegg Gifford & Co Limited (CG) is committed to protecting the privacy and confidentiality of all individuals and takes its responsibilities regarding the security of data very seriously. CG are authorised and regulated by the Financial Conduct Authority (FCA) to arrange and administer insurance products. We are also licensed by the Guernsey Financial Services Commission. This includes processing any personal data lawfully, fairly and in a transparent manner.

Information collected via our website

We collect web usage information when you visit our website including information such as the IP address, date, time, page viewed or searched relating to your browsing activity, referring website and length of stay. Where you have provided personal data we may collect web usage information to enable us to build a demographic profile.

We may also use web usage information to create statistical data regarding the use of our website. Where statistical data is produced, we may then use that data to help us assess the effectiveness of marketing campaigns, develop and deliver services and information to improve the overall effectiveness of our website. We will also use IP addresses to analyse trends, track users movements and gather broad demographic information for our own internal use.

Within our website you can interact with us, if you so wish. Where you provide your personal data on our website it will be taken as a positive action that you would like us to contact you for the purpose as set out on our website.

Linking to third party websites

We do not take responsibility for the privacy policies or practices of other sites, even where you access those using links from our website. You are advised to read the Privacy Notice of other websites prior to using them.

What information do we collect about you if you are interested in our services and why?

As a brokerage and as part of our service we will only collect information from you so that we can arrange insurance products that maybe suitable for you. In the financial services industry we call this fact finding. Fact finding provides us with all the information that we need from you, in order to provide you with suitable products that meet your circumstances and requirements.

When obtaining information from you, we will do so through the website, phone, email, text, post or face to face and will confirm the accuracy of the data collated. It is important that all the data we hold on you is accurate so that we can arrange insurance products that are suitable to you.

The types of information we will collect from you includes; contact details, date of birth, gender, employment details, insurance needs, bank details and identity documents. In addition, we may collect sensitive personal data such as medical conditions or criminal and motoring offence data where required to do so to arrange a policy on

your behalf.

We may need personal information including details of members of your family, lifestyle, finances, business or education.

If you provide personal information about other individuals (such as employees, named drivers, family members etc.), you must obtain their consent prior to disclosing it to us.

If you would like us to discuss your policy or the setting up of a policy with someone else who is acting on your behalf then we will need your consent first.

Your data may also be used to help us assess your ongoing needs and to inform you about any insurance products or services that may meet those needs.

Transfer of personal information with third parties

Occasionally we may receive your contact details from a third party lead generator to whom you have expressed an interest in the products/service we have to offer. Where we use lead generators we will request from them that they have obtained your consent and have made it clear to you that they will pass your details on to a firm such as ours and that you will be expecting us to contact you.

We may also share your data with firms who assist us in meeting our obligation to you to arrange and administer your insurance.

We may also share your data with our auditors and accountants to enable them to assist with our record keeping. Where required we may share your data with solicitors, loss adjusters, engineers, claims handling and other agents, if we need them to act on our behalf.

As part of our service and where you have expressed an interest in a particular insurance product we may forward your details onto a firm who we believe will be able to help you find comparison quotes for this product.

Information from other sources

We may obtain information from other sources such as public records, credit referencing agencies, Claims and Underwriting Exchange (CUE), Motor Insurers Bureau (MIB) and MyLicence if required. This is to enable us to verify who you are or facts that you have told us are accurate.

Information relating to your insurance policy will be added to the Motor Insurance & Policy Data Database (MIPD) managed by the Motor Insurers' Bureau ("MIB"). We work in partnership with the Motor Insurers' Bureau (MIB) and associated not-for-profit companies who provide several services on behalf of the insurance industry.

At every stage of your insurance journey, the MIB will be processing your personal information and more details about this can be found via their website: www.mib.org.uk. Set out below are brief details of the sorts of activity the MIB undertake:

- Checking your driving licence number against the DVLA driver database to obtain driving licence data (including driving conviction data) to help calculate your insurance quote and prevent fraud
- Checking your 'No Claims Bonus' entitlement and claims history
- Prevent, detect and investigate fraud and other crime, including, by carrying out fraud checks
- Maintaining databases of:
 - Insured vehicles (Motor Insurance & Policy Data - MIPD)
 - Vehicles which are stolen or not legally permitted on the road (Vehicle Salvage & Theft Data – VS&TD)
 - Motor, personal injury and home claims (CUE)
 - Employers' Liability Insurance Policies (Employers' Liability Database)
- Managing insurance claims relating to untraced and uninsured drivers in the UK and abroad
- Working with law enforcement to prevent uninsured vehicles being used on the roads
- Supporting insurance claims processes

Persons (including their appointed representatives) pursuing a claim in respect of a road traffic accident (including citizens of other countries) may also obtain relevant information which is held on the MIPD. It is vital that the MIPD holds your correct registration number. If it is incorrectly shown on the MIPD you are at risk of having your vehicle seized by the Police. You can check that your correct registration number details are shown on the MIPD at www.askMID.com

How will we use this information?

We will only use your data in ways that you would reasonably expect us to. Below summarises how we use your data.

We will use the information you provide to us to research the market on your behalf to find a suitable policy that meets your circumstances and needs. Once we have carried out research we will provide you with a personalised quotation detailing the product information. Whilst you consider the quotation we will remain in touch to answer any questions you may have.

If you are happy to proceed we will then use your data to assist in the filling out of an application form or Statement of Fact which will be forwarded to you to check is accurate and complete. The information provided by you will be used to arrange the Contract of Insurance with the relevant insurer. We may also keep in contact with you throughout the life time of the policy.

We will then contact you at renewal or when your policy is due to be reviewed so that we can continue to ensure that the policy you have in place remains suitable. Where your circumstances or personal information have changed we will update our records and where necessary, notify the insurer to do the same.

We will also use your data:

- To help you make a claim;
- To handle a complaint if you are not happy with the service you have received from us; and/or
- Where we have delegated authority with an insurer, to handle a claim and/or complaint on your policy.

As part of our service we like to keep our customers up to date with new products or offers that are available and maybe of interest. Therefore, we may contact you from time to time through email marketing, phone, text or other types of marketing material. If you wish to opt out of this at any point then please let us know.

In the interest to improve our services, telephone calls may be monitored and/or recorded for training purposes and to assist us with the handling of your policy, claim or complaint.

You may choose not to have your personal information shared with third parties. You may also choose not to allow us to use your personal information for any purpose that is incompatible with the purposes for which we originally collected it or subsequently obtained your authorisation.

If you choose to limit the use of your personal information, we may not be able to continue to offer you our services.

Who will it be shared with?

We will only pass your information to other firms, where it is necessary to administer your insurance contract or to handle or help you make a claim. The other firms will be insurers, other insurance brokers, price comparison sites and firms handling or assisting with claims. It includes finance providers and firms that process or administer our records.

Where required we may forward your details onto regulatory authorities where we have a legal obligation to do so or where fraud is suspected we may pass information to fraud agencies.

What we will do to ensure the security of personal information

If we have to transfer information to a third country outside the EU, we will only do so if a similar level of protection

applies. The information you provide will be held securely by us regardless of whether the information is in electronic or physical format.

How long will we retain your data?

We only hold data for as long as is necessary. Where we have arranged a policy on your behalf we will keep your file including your personal data and any call recordings, on record for a minimum of seven years after the expiry of an annual or short period contract, claim settlement or complaint, in line with our regulatory obligations.

Where you have enquired about a quote we will hold your data for a maximum of four years.

What are your legal rights?

You can obtain a copy of your personal information from us without charge by contacting us at the address above. This may include the right to transfer information to other providers.

You have the right to ask us to correct information we hold on you.

You have the right to ask us to delete any information we hold on you or to object to us using it, unless it is necessary for us to retain it for insurance, legal or financial purposes.

You may also have the right to object if decisions about you are made solely by a computer.

Where the processing of your data is solely based on your consent, you have the right to withdraw this consent at any time by contacting us by phone or email.

Marketing

We do not use pre-ticked boxes or make assumptions that you have given your consent. Your consent must be freely given by positively opting in or making a clear affirmative action that you are giving your consent. We will do our very best to ensure you know exactly what you are consenting to and remind you that you may withdraw your consent at any time. Where consent is obtained, a record of this will be made confirming what you have consented to and how consent was obtained.

- **Customers:** Our customers are important to us however we appreciate that on some occasions you may wish to look elsewhere. If you do, we would like to stay in touch and therefore will ask for your consent in order for us to do so.
- **Potential Customers:** Where you have expressed an interest in a product but have then decided not to proceed we would like to keep in touch therefore will ask for your consent to do so in case a product may be of interest to you at a later date.

Changes to this Privacy Notice

We reserve the right to update or change our Privacy Notice at any time. If we make any material changes, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

Your continued use of the Service after we post any modifications to the Privacy Notice on this page will constitute your acknowledgment of the modifications and your consent to be bound by the modified terms.

Right to complain

We hope that the service you receive from us is to the high standard you would expect. If at any point you are unhappy with the way we have used your data then please notify us by email, post or phone using the details above.

If you still remain concerned about the way we collect or use your personal data you can raise your concern with the independent authority set up to uphold information rights and data privacy of individuals in your jurisdiction. The independent authorities details are as follows:

- If you are located in the UK, contact The Information Commissions Office (ICO) on 0303 123 1113. For further details you may visit the ICO website <https://ico.org.uk>
- If you are located in Guernsey, contact The Office of the Data Protection Authority (ODPA) on 01481 742074. For further details you may visit the ODPA website at <https://www.odpa.gg/>
- If you are located in Jersey, contact The Office of the Information Commissioner (OIC) on 01534 716530. For further details you may visit the OIC website at <https://oicjersey.org>

We will keep your complaint on record for a maximum of six years.