

GDPR PRIVACY NOTICE

We understand that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our customers and agents and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About

Simcox Brokers Ltd Reg No.11806119 of Steelworks, Unit 3 Netham View Industrial Park, Netham Road, Bristol, BS5 9PQ, is an Appointed Representative of Bennett Gould & Partners (Dorset) Ltd, Reg No:0404405. Registered office Corinium House, Corinium Avenue, Gloucester, GL4 3HX, UK who are authorised and regulated by Financial Conduct Authority (FCA) to sell general non-investment insurance products. Their Financial Services number is 310780. Our FCA register number is 565360 and you can check these on the FCA's register by visiting the FCA's website <https://www.fca.org.uk/firms/financial-services-register> or by contacting the FCA on 0800 111 6768.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can

always contact us to find out more or to ask any questions using the details in [Part 11](#).

- The right to access the personal data we hold about you. [Part 10](#) will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in [Part 11](#) to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in [Part 11](#) to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in [Part 11](#).

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What Personal Data Do You Collect?

In order for us to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, we need to collect and process personal data about you. The types of personal data that are processed may include;

Individual details: Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you

Identification details: Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number

Financial information: Bank account or payment card details, income or other financial information

Risk details: Information about you which we need to collect in order to assess the risk

to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data. For certain types of policy, this could also include telematics data.

Policy information: Information about the quotes you receive and policies you take out

Credit and anti-fraud data: Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you

Previous and current claims: Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports

Special categories of personal data: Certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation.

We might collect your personal data from various sources, including:

- you;
- your family members, employer or representative;
- other insurance market participants;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as the DVLA and HMRC;
- open electoral register; or
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers

Which of the above sources apply will depend on your particular circumstances.

6. How Do You Use My Personal Data?

Under the GDPR, we must always have your consent or a legal basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it (legal basis). You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.

Your personal data will be used for one or more of the following purposes:

Quotation/Inception:

Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
Evaluating the risks to be covered and matching to appropriate policy/ premium
Payment of premium where the insured/policyholder is an individual
Supplying you with information by email and post.

Policy administration:

Client care, including communicating with you and sending you updates
Payments to and from individuals

Claims Processing:

Managing insurance and reinsurance claims
Defending or prosecuting legal claims
Investigation or prosecuting fraud

Renewals:

Contacting the insured/policyholder to renew the insurance policy
Evaluating the risks to be covered and matching to appropriate policy/ premium
Payment of premium where the insured/policyholder is an individual
Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:
Complying with our legal or regulatory obligations
General risk modelling
Transferring books of business, company sales & reorganisations

Please note that in addition to the disclosures we have identified against each purpose, we may also disclose personal data for those purposes to our service providers, contractors, agents and group companies that perform activities on our behalf.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out where appropriate.

In order to provide insurance cover and deal with insurance claims in certain circumstances insurance market participants may need to process your special categories of personal data, such as medical and criminal convictions records, as set out against the relevant purpose. Your consent to this processing may be necessary for the insurance market participant to achieve this.

7. How Long Will You Keep My Personal Data?

We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility

that either you or we may wish to bring a legal claim under this insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

8. How and Where Do You Store or Transfer My Personal Data?

We may need to transfer your data to insurance market participants or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the GDPR. If you would like further details of how your personal data would be protected if transferred outside the EEA, please contact the data protection contact of the relevant participant.

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

9. Do You Share My Personal Data?

The insurance lifecycle involves the sharing of your personal data between insurance market participants, some of which you will not have direct contact with.

The identity of the insurance market participants will be the insurer on your insurance documents. We may have used more than one insurance participant to get the best product for you and we, upon request can advise you of who we consulted prior to your insurance contract placement with the initial data controller.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in [Part 11](#). To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Compliance Officer
Corinium House, Corinium Avenue, Gloucester GL4 3HX
Email: compliance@bgpltd.com
Tel: [03330 146 156](tel:03330146156)

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website www.bgpltd.com