

PRIVACY STATEMENT

Data Protection and Privacy Statement

INCEPTA act as data controller and our contact details are shown above. Contact e-mail address for Data Protection requests is info@inceptagroup.com

Data Protection and Client Confidentiality

We are committed to protecting your privacy including sensitive personal information; please read this section carefully as acceptance of any insurance policy will be regarded as having read and accepted these Terms and Conditions.

Data we may collect about you (your Personal Data)

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.

We collect data from you in order to obtain insurance quotations, arrange an insurance policy, manage an insurance policy and where agreed provide some claims assistance.

We are an insurance intermediary but we are not an insurance company. We may in some instances operate partly for an insurance company.

Where we deal with getting insurance quotations, arranging insurance cover, managing an insurance policy, act as agent of an insurer or act as an insurance intermediary, it will be because you have asked us to provide you with that service or to arrange or possibly arrange an insurance policy with an insurer.

Legal reasons for collecting Personal Data

The legal purpose we use is that of contact or taking action with a view to arranging and servicing a contract of insurance. In these cases we will need to share the data you have given us in order to provide these services. Examples would be insurance providers and other insurance market participants.

We also handle the personal data as part of our legitimate business reasons as carrying on our business including that of an insurance intermediary. This can include sharing data with regulators and Ombudsmen.

Data Transfer Consent

By accepting this Terms of Business Agreement with Incepta Risk Management Limited, you have consented to the use of your data for use in the provision of our services including giving consent for other market participants to use such personal data.

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.

You may withdraw your consent to such processing at any time as allowed by law. However, the withdrawal of consent would not affect processing that has already taken place prior to the withdrawal of consent or where your personal data is being processed for other lawful reasons. If you withdraw your consent this may impact on our ability to provide certain service to you.

Sensitive Information

Some of the personal information we ask you for may be sensitive personal data, as defined by the Data Protection Act 1998 and or special category data as defined in the General Data Protection Regulations 2016/679 and criminal offences and conditions (such as information about health or criminal convictions).

We will not use such sensitive personal data about you or others except for the specific purpose for which you provide it and to provide the services described in your policy documents. By providing us such data you confirm that you have obtained all necessary permissions, authorisations and consent from the data subjects for us to handle such data. Plus any references in the Data Protection Bill.

International Transfers

We do not send data outside the EEA unless required to do so in the provision of a service to you under this Terms of Business Agreement. Examples may be, but not limited to, providing assistance on overseas claims, being asked to report to someone who is situated overseas, to set up a multi-national placement. We expect, and you confirm, that you will have obtain all necessary and require consent for us and others to send data outside the EEA as described herein, for purposes described in tis Terms of Business Agreement.

Retention of your Personal Data

We will keep your personal data for up to seven years after any service we provide under a contract we have with you expires or the arranged insurance policy expires 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. These times may be extended by legal or regulatory requirements.

How we use and protect your information and who we share it with

We will use your information to manage your insurance policy, including underwriting and claims handling. This may include disclosing it to other insurers, administrators, third party underwriters and reinsurers.

Your information comprises of all the details we hold about you and your transactions and includes information obtained from third parties.

We do not disclose your information to anyone outside Incepta Risk Management Limited except:

- Where we have your permission;
- Where we are required or permitted to do so by law;
- To credit reference and fraud prevention agencies;
- Other companies that provide a service to us or you;
- Where we may transfer rights and obligations under this agreement

We may transfer your information to other countries and jurisdictions on the basis that anyone to whom we pass it provides an adequate level of protection. However, such information may be accessed by law enforcement agencies and other authorities to prevent and detect crime and comply with legal obligations.

Your rights and contact details of the ICO

Where the law does allow us to charge a fee then we reserve the right to do so.

1. You have the right to request why we are holding your data, the categories of data we hold, the purpose of the processing, the categories of the recipients of such data, how long we may hold that data, if automated processing is involved, and the possible source of the data if we did not collect the data direct from you.
2. You can ask if any of your personal data is transferred outside of the EEA by us or a processor acting for us.
3. You can ask for copies of personal data undergoing processing, where that does not affect the rights and freedoms of others. If you require further copies we can charge you a reasonable fee.
4. You can ask us to rectify inaccurate information or change and update any data that we hold about you.
5. You have the right to lodge a complaint regarding our processing of your personal data.
6. You have the right to the rectification of any inaccurate personal data we hold about you or to have 'incomplete data' made 'complete' provided the processing requires such completeness.
7. In certain cases, listed below you have the right to request the erasure of personal data we hold about you, but such a request would not override our compliance with any legal obligation we have;
 - it is no longer necessary for us to hold such personal data in relation to the purpose for which it was collected,
 - you gave consent and now wish to withdraw that consent and there is no legal grounds for us to continue processing,
 - on the grounds that we do not have a legitimate interest in processing your personal data and that was the legal basis we were using, and can verify that is the case,
 - where we are using your personal data for marketing purposes,
 - the personal data was unlawfully processed, but you can ask us to continue storage of such data if you wish rather than select erasure.
8. You have the right to restrict processing, but not continued storage, where the accuracy of the data is contested whilst we verify the accuracy.
9. There may be cases where you can request that we transfer some personal data to another controller.
10. You have the right to object to a decision based solely on automated decision making or profiling where this is not necessary for entering into or the performance of a contract between us and you or you have already given us your explicit consent and the process has already taken place but we will where reasonable and appropriate, review any decision made and consider any point of view you make regarding that decision.
11. Were we have given the legal reason for processing as your having given us consent to that processing, then you can withdraw that consent and after that withdrawal no further processing will take place, but this does not affect processing which is based on other legal grounds.

Your right to complain to the ICO

If **you** are not satisfied with **our** use of **your personal data** or **our** response to any request by **you** to exercise any of **your** rights in SECTION 10, or if you think that we have breached the **GDPR**, then **you** have the right to complain to the **ICO**. Please see below for contact details of the **ICO**.

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

Tel: 0303 123 1113 (local rate) or
01625 545 745 (national rate)

Email: casework@ico.org.uk

Scotland
Information Commissioner's
Office
45 Melville Street
Edinburgh EH3 7HL

Tel: 0131 244 9001

Email: scotland@ico.org.uk

Wales
Information Commissioner's
Office
2nd floor Churchill House
Churchill way Cardiff CF10 2HH

Tel: 029 2067 8400

Email: wales@ico.org.uk

Northern Ireland
Information Commissioner's
Office 3rd Floor 14 Cromac
Place
Belfast BT7 2JB

Tel: 0303 123 1114 (local rate) or
028 9027 8757 (national rate)

Email: ni@ico.org.uk

Marketing

Incepta Risk Management Limited will not sell your personal data for marketing purposes. We may use your data and any personal data you provide us, to market our services to you. All information provided is used to manage your insurance policy only.