



Introduction

Incepta Risk Management Limited ("we", "us", "our") needs to collect and process personal data from or about individuals ("you", "your") in order to broker insurance and provide our associated services. This Privacy Notice explains when, why, and how we collect and process your personal data, the third parties with which we may share your personal data, what your rights are in the event we hold your personal data, and how you can enforce these rights. We may amend this Privacy Notice from time to time in order to reflect any changes in how we process personal data, or to satisfy any new requirements under applicable data protection laws. If we make any significant changes, we will let you know directly.

This version of the Privacy Notice was published in October 2025.

1. Definitions

To be clear on what we mean in this Privacy Notice:

- "personal data" is any information that can be used to identify a living individual;
- "sensitive personal data" is personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, health data, sex life or sexual orientation;
- "data controller" means an organisation that decides how and why to collect personal data;
- "the Howden Group" is Howden Group Holdings Limited and any company or organisation in which Howden Group Holdings Limited holds significant share capital. We are part of the Howden Group, and you can find out more information about other companies in the Howden Group by visiting www.howdengroupholdings.com; and
- "third-party" is someone who isn't you, us, or a company in the Howden Group.

2. Who does this Privacy Notice relate to?

This Privacy Notice relates to the following types of individuals, where we hold your personal data:

- Individuals who are prospective, current or former clients, including their representatives, for example those with power of attorney;
- Other individuals named on policies, joint policy holders or beneficiaries;
- Employees of our corporate clients who we liaise with, or who are named on a policy;
- Individuals who we liaise with at insurers, managing general agents and other market participants;
- Members of a trade or professional association;
- Individuals who contact us with a query, concern or complaint;
- Individuals whose personal data we may have obtained from publicly available sources, for example in connection with us undertaking background checks on our potential clients; and
- Individuals who solicit us for a quote, or who we solicit for marketing purposes.

3. Who are we?

We are part of the Howden Group, and are regulated in the UK by the Financial Conduct Authority (FCA) under reference number 535175 (you can view a full list of our current trading names by visiting <https://register.fca.org.uk> and searching our name). We are also registered with the Information Commissioner's Office (ICO) under registration Z2373595.

4. When and how we collect this personal data

We may collect personal data from, or about, you at different times and through different channels depending on our relationship with you, for example if:

- You request a quotation from us, either directly or via an intermediary;
- You purchase, change or cancel a policy through us;
- You are covered under, or named on, a policy that has been taken out by your employer;
- We receive notification of a claim that is made against you, or that you bring against one of our policyholders;
- You are a client of a business that we acquire;
- You contact us in writing or speak to us on the phone;
- You visit one of our stands at a show or trade fair;
- You give permission to other companies to share your information with us;
- Your information is publicly available, and we have a legitimate reason(s) to use it; and
- We are provided with your personal data by third parties such as anti-fraud and crime-prevention agencies, credit reference and vetting agencies, and other data providers.

5. What personal data do we collect?

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

- **Identity and contact data:** for example, your name, gender, date of birth, postal address, job title, telephone number and e-mail address;
- **Policy and claims information:** for example, your policy number, details of your cover, premiums due, relationship to the policyholder (if applicable) and previous claims history;
- **Payment and account data:** for example, your bank account details and credit/debit card details where you are the payer of a premium;
- **Location data:** for example, your residential, work or IP address, the location of an insured item or property, and in the event of a claim, where the incident occurred;
- **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.
- **Information we obtain from other sources:** including credit agencies, antifraud and other financial crime prevention agencies;
- **Complaint data:** for example, what the complaint was, how we investigated it and how we resolved it, including any contact with third-party adjudicator services;
- **Internet data:** for example, information such as your IP address that may be collected by cookies and other online technologies when you visit our website; and
- **Sensitive personal data:** for example, health-related data or ethnicity data, but only in restricted circumstances as explained under Section 8.

6. The lawful ways we use personal data

We collect and process personal data for the following lawful reasons:

- **To enter into or perform a contract with you:** for example, where you are an individual policyholder and we need to process your personal data in order to provide you with a quotation (should you request

one), or to arrange your insurance, manage any claims which arise with your policy, answer any queries you may have, action your requests and manage your renewal(s);

- **To comply with a legal obligation:** for example, the rules set by our regulator the Financial Conduct Authority (FCA), to fulfil your data rights under data privacy laws, handle complaints about our services, and to comply with other legal requirements such as preventing money laundering and other financial crimes;
- **For our legitimate business interests:** for example, to arrange and administer a policy where your employer is our client, to respond to third party claimants, to maintain accurate records in our systems, to monitor and improve our products and services through the use of analytics, to demonstrate compliance with applicable regulations, to undertake some marketing activities, and to facilitate internal management reporting activities across our businesses. 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 us relying on this lawful reason (if applicable) to process your personal data;
- **With your consent:** for example, if you consent to us contacting you for marketing purposes. You can withdraw your consent at any time (to the extent we are relying on it) by using the contact details set out in this Privacy Notice; and
- **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.

7. The lawful ways we use sensitive personal data

We only collect sensitive personal data from or about you where:

- This is necessary for us to advise, arrange or administer an insurance policy or claim arising from one;
- This is necessary for us establish, exercise or defend a legal claim;
- This is necessary for us to safeguard vulnerable individuals;
- We have obtained your explicit consent; or
- You have manifestly made this type of data public.

8. Who we share personal data with

Below are the categories of third parties that we may share your personal data with, but only where we have a legitimate reason to do so:

- Insurers, intermediaries (including, but not limited to, other insurance brokers and managing general agencies), risk management assessors, loss adjusters, loss recovery agencies and third party administrators who work with us to help manage and administer our policies;
- Credit reference, credit scoring and fraud prevention agencies;
- Debt collection agencies;
- Law enforcement, government bodies, courts, tax authorities and our regulators;
- Service providers who help us manage our IT and back office systems, or who provide us with tools or platforms that we either make available to you, or which we use to undertake activities mentioned earlier in this Privacy Notice;
- Marketing fulfilment, webinar and customer satisfaction service providers, acting on our behalf in facilitating online events, providing marketing communications and capturing feedback from our customers on our service levels;
- Any third party where disclosure is required to comply with legal or regulatory requirements;
- Other Howden Group companies; and
- Potential purchasers of our businesses.

9. Use of Artificial Intelligence

In certain cases, the tools, systems or platforms alluded to under Section 9 may leverage Artificial Intelligence and related technologies. For example, in order to reduce the time it takes for us to manually produce a summary of a meeting or a phone call and then file that against a customer record, we may use a Generative AI service that analyses the transcript of that meeting or phone call to produce a summary that is then subject to a human review for accuracy. Or we may use Large Language Models that rely on our internal indexing of documents to make it easier for us to search for and retrieve information that we hold. In the event that we use Artificial Intelligence and similar technologies to make decisions about you, we will inform you of such separately.

10. Sharing data within the Howden Group

As stated in Section 9, we may share personal data with other companies within the wider Howden Group for the following purposes:

- To receive administrative support from those companies, such as the receipt of IT, HR, Finance and Compliance services;
- So that these companies can provide market insight to insurers on a confidential basis, but only where personal data has been aggregated or anonymised; and
- So that we can offer you services that may be available from another company in the Howden Group, but only if permitted under electronic marketing laws.

We will only share the minimum amount of personal data required to achieve these purposes, ensuring that we have a lawful basis to share personal data and that any processing undertaken on our behalf is governed by a data processing agreement.

11. International data transfers

In order to fulfil the purposes described in this Privacy Notice, we may need to transfer your personal data outside of the UK and/or outside of the country or region in which you are located. For example:

- We may need to transfer your personal data overseas in order to arrange insurance for you, with the destination being dependent on the location of the market participants involved in the insurance chain (for example the underwriter may be based in the United States);
- We may need to make your personal data available to our Howden Group companies established in the European Union or Switzerland (for example) if they are better placed to support you; or
- We may need to transfer your personal data to an overseas supplier if (for example) they provide us with an online software service that we in turn have made available to you.

If the overseas destination is not considered to provide an adequate level of protection under the data protection law that applies to the processing of your personal data, then we shall generally ensure that a formal and enforceable set of standard contractual clauses is, or has been, entered into between us and the overseas recipient. You can ask us for more information on this by using the contact details set out under Section 15.

12. Retaining and destroying personal data

We retain personal data about you in order to provide any services that you may request from us, to meet a number of legal and regulatory record-keeping requirements, as well as to support our own legitimate business interests. In most cases we will retain your personal data for 7 years following the end of our relationship with you in order to ensure we can sufficiently handle any disputes, claims or complaints that may arise in connection with the relationship. In some cases we may need to retain your personal data for longer than this period, for example if a relevant insurance policy allows for a longer claim notification window, and in some cases we shall only retain your personal data for a shorter period, for example if you ask us to provide you with a quote but then choose not to proceed.

13. Your data rights

Data protection laws give you rights relating to your personal data. Should you wish to enforce a right (generally at no cost to you), or make a data protection complaint, please use the contact details set out below. We aim to provide a final response within one month of receiving a request, unless the request is particularly complex in which case we will let you know when we expect to complete it by:

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Access	You have a right to request a copy of the personal data that we hold on you, along with meaningful information on how it is used and who we share it with, however there are some instances where we may not be able to provide you with some or all of the information we hold. Where this is the case, we will explain to you why when we respond to your request, unless the relevant laws or regulations prevent us from doing so.
Rectification	You have a right to ask us to correct inaccurate or incomplete personal data that we hold about you. 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.
Erasure	You can request that we delete your personal data in certain circumstances, for example if we no longer need the personal data for the purpose(s) for which we collected it. We will either confirm to you that this has been done, or if we are unable to delete it due to a compelling overriding reason, we will let you know why.
Restrict processing	You can ask us to restrict the processing of your personal data in certain circumstances. If you do so, we will either confirm that this has been done, or if we are unable to do so, we will let you know why.
Data portability	In certain circumstances you have the right to request that your personal data be transferred to yourself or a nominated third party in a common, machine readable format. 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.
Object to direct marketing	You can object to receive direct marketing from us, and this right is absolute. You can do this by simply clicking on the unsubscribe link in any email you receive from us or alternatively getting in touch with us.
Object to our legitimate interests	Where we process your personal data to achieve a legitimate business interest of ours, for example those described under Section 7, you have the right to challenge this. If you do so, we will either confirm to you that the processing has stopped or explain why we believe our interest in the relevant activity outweighs your interest.
Object to automated decision-making	If you are an insured person undertaking a credit check through a premium finance lender, we may use Automated Decision Making to determine what action to take based on the resulting credit score. You have the right to object to decisions made about you using your personal data 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.

Should you submit a request or complaint to us and remain unhappy with our response, you may raise a complaint directly with the ICO whose contact details can be found at www.ico.org.uk.

14. Our contact details

The primary point of contact for all issues arising from this Privacy Notice, including requests to exercise your rights, are as follows:

- By e-mail: info@inceptagroup.com
- By telephone: 020 3058 1530