

Privacy Policy

Safe&Secure Insurance Services Limited.

Registered Office:

Unit 12, Stadium Business Court, Millennium Way, Pride Park, Derby, DE24 8HP.

Registered in England & Wales Number: 04162399

Safe&Secure Insurance Services Limited comply with Data Protection laws in the United Kingdom and the EU General Data Protection Regulation (GDPR). This Privacy Policy details how Safe&Secure processes your personal data.

Who we are

Safe&Secure are Insurance Brokers specialising in Household and Landlords Insurance. We receive introductions from organisations who wish their customers to have a quotation for home or landlord's insurance. Safe&Secure deal with the customer and provide quotations from its panel of insurers and arrange insurance cover for those customers who wish to do so.

What personal data do we collect from Intermediaries?

When you register as an agent of Safe&Secure you will be asked to complete a registration document giving us details about your firm such as: firm and business writers name, postal address, company number, FCA number, email address, phone numbers, company bank account details.

What we do with intermediary data

- Registration with the FCA if you are to become an Introducer Appointed Representative of Safe&Secure
- to follow up, either by e-mail, phone or mail as part of our customer service procedures;
- to periodically send promotional e-mails from us (or on behalf of someone else) about new products, special offers or other information which we think you may find interesting using the e-mail address which you have provided;
- to meet our legal and regulatory obligations;
- to help us improve and develop our website, online products and services;
- to understand our user demographics and use of our website and online products;
- for administration and client relationship management;
- to answer questions and respond to comments, requests or queries you send us, including any application for employment;
- to manage our receipt and reconciliation process and payment to you of product provider commissions, send invoices or reminder notices or otherwise notify you of changes to our products or services, and any other purpose related to or ancillary to any of the above.

What personal data do we collect from Individuals

Personal data collected, used, stored and transferred by us may include:

- **Identity Data** including forenames, last name, date of birth, gender, marital status, occupations, username or similar identifiers, and any other information relevant to FCA registrations
- **Contact Data** including home address, correspondence address, email address and telephone numbers.
- **Transaction Data** including payments made for products we have arranged for you.
- **Technical Data** including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Safe&Secure Insurance Services Limited website.
- **Profile and Usage Data** including feedback and survey responses, and how you use our website, products and services.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and your communication preferences.

How do we collect individual's personal data?

Personal data is collected by us using the following methods:

- Telephone
- Email
- Post
- Website
- Third parties (i.e. Financial/Mortgage advisers, Letting/Estate agents, but only with your consent)

How do we use individual's personal data?

We use your personal data in the following circumstances and relying on the following lawful basis for processing:

Purpose/Activity	Type(s) of data	Lawful basis for processing
To initially engage with you to discuss your requirements	<ul style="list-style-type: none">• Identity• Contact	Consent
To process and deliver your application for an insurance product	<ul style="list-style-type: none">• Identity• Contact• Transaction• Marketing & Communication	Performance of a contract with you Necessary for our legitimate interests
To manage our relationship with you which will include: <ul style="list-style-type: none">• Notifying you about changes to our terms or privacy policy• Customer reviews/surveys• Re-engaging when existing products nears expiry / review insurance needs	<ul style="list-style-type: none">• Identity• Contact• Profile & Usage• Marketing & Communication• 	Performance of a contract with you To comply with a legal obligation Necessary for our legitimate interests (to re-engage with you to review your existing insurance needs, and to maintain and improve customer service standards)
To respond to case enquiries and input & to defend against complaints	<ul style="list-style-type: none">• Identity• Contact• Profile & Usage• Transaction	To comply with a legal obligation Necessary for our legitimate interests (to ensure complaints can be responded to accurately)

	<ul style="list-style-type: none"> • Marketing & Communication 	
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical 	To comply with a legal obligation Necessary for our legitimate interests (For running our business, provisions of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Marketing & Communication • Technical 	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Profile & Usage 	Necessary for our legitimate interests (to analyse customer usage, update our website, to develop our business and to inform our marketing strategy)

Change of purpose

We will only use your personal data for the purposes stated above, unless we reasonably consider that we need to use it for another reason and it is compatible with the original purpose. Please contact us for an explanation as to how any new processing compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Changes to our Privacy Notice

Any changes to our Privacy Notice will be updated on this web page. This Privacy Notice was last updated on 25th May 2018. Historic versions can be obtained by contacting us.

Marketing communications

You will also have the choice to opt-in to receiving other related marketing information and related products and services.

You can opt-out of receiving these types of communications at any time by contacting our Compliance team at compliance@safeandsecure.co.uk or by clicking on the relevant link in email communications you receive from us.

However please note that your personal information will not be passed to any third-party organisation for marketing purposes.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to only those Safe&Secure Insurance Services Limited staff, appointed representatives, advisers, business partners and suppliers who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Cookies

When using the Safe&Secure Insurance Services Limited website, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy on our website www.safeandsecure.co.uk

Website Third-party links

Safe&Secure Insurance Services Limited website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Use and storage of your information overseas

Safe&Secure do not envisage transferring any information about or relating to individuals to anyone who is located outside of the European Economic Area.

However, some of our external suppliers are based outside the European Economic Area (EEA) so their processing of your personal data may involve a transfer of data outside the EEA.

Please refer to your insurers privacy statement for further details as appropriate.

Who we disclose personal data to

Your personal data may be shared with third parties for the following purposes:

Type of recipient	Reason
Within Safe&Secure	Depending on your requirements, it may be necessary to share your personal data with Safe&Secure's specialist product providers in order for suitably qualified advisers to source relevant products and services or to re-engage with existing clients
Insurance product suppliers	To source and submit applications in order to conclude the contract for the insurance application and the ongoing servicing of these contracts

External suppliers	Specialist IT system providers to facilitate the sourcing of products, to provide continuing advice, to inform you about relevant products and services, and to request feedback on customer service standards. It may also be necessary to share your personal information with non-affiliated companies who perform support services on our behalf including those that provide professional, legal or accounting advice to Safe&Secure
Regulators	Sharing of information may be necessary to fulfil our legal obligations as a regulated profession, for example with the Financial Conduct Authority, to verify your identity, and comply with Anti Money Laundering legislation, and otherwise co-operate with law enforcement, legal proceedings or regulatory authorities.
Others	Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your personal data, and to use your personal data only in the course of providing such services and in accordance with Safe&Secure Insurance Services Limited instructions.

How long is your personal data retained?

We only retain your personal data for as long as necessary. The table below outlines how long data is retained, and depends on the reason the personal data is used for:

Purpose of processing	Retention
Successful insurance applications	7 years from the date the latest insurance product expires
Incomplete or failed insurance applications	2 years from the date the latest application was started
Enquiry data obtained from third parties that do not result in an application for an insurance product	2 years from the date the lead was received from the introducer

Your legal rights regarding your personal data

After these retention periods if there is no other on-going client relationship your personal data will either be securely deleted or anonymised so that it can be used for statistical purposes but without any method of identifying you individually.

You have the right to:

- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data. This enables you to have any incomplete or inaccurate data corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You can also ask us

to delete your personal data where you have successfully objected to the processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to delete the data for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Questions

If you have any questions about our privacy policy, the information we hold about you, or If you would like to exercise any of 'your rights' above, you may do so by writing to us at the address at the start of this notice, or email us with specific details of your request at; compliance@safeandsecure.co.uk

What if I am still not satisfied?

If you are not satisfied with our use of your personal information, our response to any exercise of 'your rights', or if you believe us to be in breach of our data protection obligations, you have the right to complain to the [Information Commissioner's Office \(ICO\)](#).