

Privacy Policy.

This policy applies to **Bspoke Commercial Ltd** and to its trading styles: **Bspoke Private Clients, Bspoke Sports & Leisure, Bspoke Accident & Health** and **Bspoke Fee Protection**. This policy explains how we use your data.

This privacy policy is relevant to anyone who uses our services, including Policyholders, prospective policyholders and any other individuals insured under a policy. We refer to these individuals as 'you' or 'your' in this notice.

Bspoke Commercial Ltd is committed to protecting your personal information, which we take very seriously. This privacy and cookie policy explains who we are, the types of information that we hold, how we use it, who we share it with, how long we keep it, what cookies are and how we and Third Parties use them. It also informs you of certain rights you have regarding your personal information under current data protection law. The terms used in this notice relate to the Information Commissioner's Office guidance.

Who are we?

Bspoke Commercial Ltd is the Data Controller of the information you provide us and is registered with the Information Commissioner's Office for the products and services we provide to you. Our data controller registration number issued by the Information Commissioner's Officer is **ZA142428**. Please see your policy documentation for details of Data Controllers with other insurers.

You can contact us for general data protection queries, if you have any questions about how we use your personal information or if you want to exercise your rights stated within this notice, please contact our Risk & Compliance team at datacontroller@bspokecommercial.co.uk or in writing to The Data Protection Officer, Bspoke Commercial, Brookfield Court, Selby Road, Leeds, LS25 1NB. Please provide us with as much detail as possible so that we can comply with your request.

For further information about Bspoke Commercial Limited or its trading styles, Bspoke Private and Bspoke Sports & Leisure, please visit www.bspokegroup.co.uk

What information do we collect?

We will collect personal information which may include your name, address, date of birth, business and property detail, telephone number, email address, postal address, occupation, vehicle details, additional details of risks related to your enquiry or product and payment details (including bank account number and sort code) which we need to offer and provide the service or product or deal with a claim.

We may need to request and collect sensitive personal information such as details of any unspent offences, convictions or medical history of you or other persons covered under your policy that are necessary for providing you with the product, service or for processing a claim. We recognise that this information is particularly sensitive and where appropriate we will ask for consent to collect and use this information.

We only collect and process sensitive personal data where it is critical for the delivery of a product or service and without which the product or service cannot be provided. We will therefore not seek explicit consent to process this information as the processing is legitimised by its criticality to the service provision. If you object to use of this information, you are free to withdraw this at any time by contacting us – please refer to the 'Contact Us' information on our website. Please note that if consent to use information is withdrawn, we may be unable to continue to offer you the product or process claims and we may need to cancel your policy.

As well as collecting personal information about you, we may also use personal information about other people whom you wish to insure under your policy. If you are providing information about another person, we will expect you to ensure that they know you are doing so and that they are content with their information being provided. You may find it helpful to show them this privacy notice and if they have concerns, please contact us on the information below.

Some of the information we collect as part of this application may be provided to us by a third party. This may include information already held about your business, property and vehicles, from previous quotes and claims, information we obtain from publicly available records, our trusted third parties and from industry databases, including fraud prevention agencies and databases.

How do we use your personal information?

We will use your personal information to:

- decide if we can offer insurance to you and if so on what terms and to administer your policies, handle any claims and manage any renewal,
- manage arrangements with reinsurers, for the detection and prevention of fraud and to help us better understand our customers and improve our customer engagement (this includes marketing, customer analytics and profiling),
- meet compliance requirements with our regulator (the Financial Conduct Authority), to comply with law enforcement and to manage legal claims,
- carry out other activities that are in the public interest; for example, we may need to use personal information to carry out money-laundering checks,
- communicate with you,
- develop new products and services,
- undertake statistical analysis.

We may also take the opportunity to:

- contact you about products that are closely related to those you already hold with us. We will do this in accordance with any marketing preferences you have provided to us. We may continue to do this after your policy has ended. If you wish to amend your marketing preferences or opt-out, please contact the Data Controller at the address above,
- provide additional assistance or tips about these products or services,
- notify you of important functionality changes to our websites.

We make outbound phone calls for a variety of reasons relating to many of our products or services (for example, to update you on the progress of a claim or to discuss renewal of your insurance contract). We are fully committed to the regulations set out by Ofcom and follow strict processes to ensure we comply with them.

To ensure confidentiality and security of the information we hold, we may need to request personal information and ask security questions to satisfy ourselves that you are who you say you are.

We may aggregate information and statistics on website usage or for developing new and existing products and services, and we may also provide this information to third parties. These statistics will not include information that can be used to identify any individual.

Securing your personal information

We take the security of your data very seriously. We follow strict security procedures in the storage and disclosure of your personal information in line with industry practices, including storage in electronic and paper formats. This is to try and ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed by unauthorised individuals.

We store all the information you provide to us, including information provided via forms you may complete on our websites, and information which we may collect from your browsing, such as clicks and page views on our websites.

Any new information you provide us may be used to update an existing record we hold for you.

When do we share your information?

To help us prevent financial crime, we may use your information to allow us to detect and prevent fraudulent applications and claims. Your details may be submitted to fraud prevention agencies and other organisations where your records may be searched, including the Claims and Underwriting Exchange (CUE) and the Motor Insurers Anti-Fraud and Theft Register (MIAFTR).

In addition to companies within the Precision Partnership Limited, third parties (for example insurers or loss adjustors) deliver some of our products or provide all or part of the service requested by you. In these instances, while the information you provide will be disclosed to these companies, it will only be used for the provision and administration of the service provided (for example verification of any quote given to you or claims processing, underwriting and pricing purposes or to maintain management information for analysis).

This may also include conducting a search with a credit reference bureau or contacting other firms involved in financial management regarding payment.

We may also share your data with other companies who carry out market research on our behalf and who may contact you for the purpose of obtaining feedback on the products and services we offer.

We will only share your information for any direct marketing of additional services and products within the Precision Partnership Limited, of companies where we have your consent to do so.

We may supply your data to databases to facilitate automatic no claims discount validation checks.

The data we collect about you may be transferred to, and stored at, a destination outside of the European Economic Area ("EEA"). It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, the provision of information you have requested. We will always take steps to ensure that any transfer of information outside Europe is carefully managed to protect your privacy rights. For more information, please contact us.

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. In the event that we sell any business, personal data held by us about our customers will be one of the transferred assets.

If we provide information to a third party we will require it and any of its agents and/or suppliers to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this fair processing notice.

We may of course be obliged by law to pass on your information to the police or other law enforcement body, statutory or regulatory authority including but not limited to the Employer's Liability Tracing Office (ELTO) and the Motor Insurance Bureau (MIB).

We may also share your information with anyone you have authorised to deal with us on your behalf.

How long do we keep your information for?

We maintain a retention policy to ensure that we only keep personal information for as long as we reasonably need it for the purposes explained in this policy unless we are required by law or have other legitimate reasons to keep it for longer (for example if necessary for any legal proceedings).

We will keep your personal data for seven years following the termination or cancellation of a product, contract or service we provided. This is to we have an accurate record in the event of any complaints or challenges, carry out relevant fraud checks or where required to do so for legal, regulatory or tax purposes. In certain cases, we will keep your information for longer, particularly where a product includes liability insurances or types of insurance for which a claim could potentially be made by you or a third party at a future date.

Following the end of the retention period, your personal data will be securely destroyed.

Credit Searches

To ensure Bspoke Commercial Ltd and our insurers have the necessary facts to assess your insurance risk, verify your identity, help prevent fraud and provide you with our best premium and payment options, we may need to obtain information relating to you at quotation, renewal and in certain circumstances where policy amendments are requested. We or our agents may:

- undertake checks against publicly available information (such as electoral roll, county court judgments, bankruptcy orders or repossession(s)). Similar checks may be made when assessing claims,
- carry out a quotation search from a credit reference agency (CRA) which will appear on your credit report and be visible to other credit providers. It will be clear that this is a quotation search rather than a credit application.

Where you agree to pay your premium monthly under a credit agreement, the status of your quotation search from our credit reference agency (CRA) will be updated to reflect your credit application and this will be visible to other credit providers. CRA's may keep a record of this search.

In order to assess your application, we will supply your personal information to our CRA and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRA's on an ongoing

basis, including about your settled accounts and any debts not fully repaid on time. CRA's will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The identity of our CRA and the ways in which they use and share personal information, are explained in more detail at <https://www.closebrotherspf.com>

Automated decision making

We may carry out automated decisions about you which may impact the level of premium you will pay or the type of product we can offer you and on what terms. In particular, we use an automated underwriting engine to provide on-line quotations, using the information we have collected.

Your rights

Under data protection law you have various rights in relation to your personal information, including the right to request access to your personal information, correct any mistakes on our records, erase or restrict records where they are no longer required, object to the use of personal information based on legitimate business interests including profiling, ask not to be the subject to automated decision making if the decision produces legal or other significant effects on you and data portability. Where we have no legitimate reason to continue to hold your information, you have the right to be forgotten.

For more details in relation to your rights, including how to exercise them, please see our full privacy notice or contact us using the details above.

Further details of your rights can be obtained by visiting the ICO website at <https://ico.org.uk/your-data-matters>.

If you have a complaint or concern about how we use your personal information, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have the right to lodge a complaint with the Information Commissioner's Office at any time.