

group privacy notice.

Purpose of this notice

This privacy notice is relevant to anyone who uses the services of our holding company, Bspoke Insurance Group Ltd, or any of our subsidiaries, including policyholders, prospective policyholders, and any other individuals insured under a policy. We refer to these individuals as "you/your" in this notice.

We are dedicated to being transparent and this privacy notice tells you what we do with the information that we collect about you.

We process your personal data in accordance with the relevant data protection legislation. We are the joint data controller for the data that we process about you and we will not collect any information from you that we do not need for the purpose of administering your insurance policy. There may be additional data controllers, such as the Broker or Intermediary where you purchased your insurance policy through or the insurer/s.

Contact details

We are Bspoke Insurance Group Ltd, referred to as "we/us/our" in this notice. Our data controller registration number issued by the Information Commissioner's Officer is **ZB538632**. Our registered address is 14 Caroline Point, 62 Caroline Street, Birmingham B3 1UF.

Anything you are not clear about

If you have any questions, or if there is anything that you are unclear about, please contact us at datacontroller@bspokegroup.co.uk and we will be happy to answer any queries you may have concerning this privacy notice or the way we process your personal data.

Why is your personal data required?

The provision of your personal data is necessary for us to administer your insurance policy and meet our contractual requirements under the policy.

If you fail to provide the data, it may mean that you are unable to exercise your contractual rights, including claiming under the policy. This would also hinder our ability to administer your insurance policy.

What information do we collect about you?

We may collect the following personal data about you:

Information collected from you/Information collected through your Broker or Intermediary.

- When you have purchased an insurance policy through your Broker or Intermediary, you provide your personal data which may include the following categories:
- Your name, address and contact details, including email address, telephone number and date of birth
- Name and date of birth of any additional insured parties
- Financial information and property information

- Information about your business
- If a claim is made, we will also collect personal information about the claim from you and any relevant third parties.

Information collected from other sources

We may collect your personal data from others in the instance that you are a joint or additional insured.

Joint Controller Responsibilities

Where we act as a joint data controller with other parties such as your Broker, Intermediary or Insurer, we have a transparent arrangement in place under Article 26 UK GDPR which sets out each party's responsibilities for complying with data protection obligations.

This includes:

- which joint controller is responsible for providing you with privacy information;
- which controller is responsible for responding to your data subject rights requests;
- how joint controllers cooperate on data accuracy, security, and legal obligations; and
- the designated contact point for any data protection queries (where applicable).

You may exercise your data protection rights against any of the joint controllers. A copy of the essence of our joint controller arrangement is available upon request.

Special Personal Information

We have a legitimate interest to collect this data as we are required to use this information as part of your insurance quotation or insurance contract with us. We may also process the data where it is necessary for a legal obligation, or as part of the establishment or defence of a legal claim.

- We may also need to ask for details relating to the health or medical conditions
- Any unspent offences or criminal convictions of you or somebody else covered under your policy.
- We recognise that information about health and offences, or criminal convictions is particularly sensitive information. We'll ensure that we only use that information where we need to for our insurance purposes

We also process special categories of your personal data as it is in the substantial public interest and it is necessary:

- For administering your insurance policy or
- To prevent and detect an unlawful act (e.g. fraud)

This is not an exhaustive list and in special instances, we may collect more personal data that stated above.

Why do we process your data?

We use your personal data to meet our obligations in our contract of insurance for you.

To provide insurance services

When you request to purchase an insurance policy from your Broker or Intermediary and they transfer the data to us, we use information about you to provide the agreed service, including if you make a claim.

To comply with our legal obligations

As part of our duties involved with providing insurance services, sometimes we are required by law to use personal data about you.

To deal with complaints;

- to help prevent and detect crime, for example, the prevention or detection of fraud); and
- to comply with a legal or regulatory obligation and/or assist our regulators (e.g. Financial Conduct Authority).

We can use your personal data in this way because we are required to do so by law.

Prevent Fraud

We may share your information with other public bodies, including the police to detect and prevent fraudulent claims and/or activities.

To improve our products

To help develop our products and systems to deliver a better experience for the future.

How do we protect your data?

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed by unauthorised individuals.

How long do we keep your data for?

As a rule, we will keep your personal data for seven years following the end of your relationship with us, as it is likely that we will need the information for regulatory reasons or to defence a claim. However, there may be exceptions where we need to keep your personal data for longer, such as where your policy contains liability cover.

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

Who might we share your data with?

Your personal data may be shared with the following categories of third parties:

- within our group of companies, our agents and third parties who provide services to us
- Insurers/Reinsurers
- Claims – Third Party Administrators
- Complaint – Third Party Administrators
- Your Broker or Intermediary, other organisations, including parties they are contracted with who provide a service related to the insurance policy
- Loss Adjusters
- Regulatory Authorities
- Fraud Prevention Agencies
- Legal and Crime Prevention Agencies
- The Claims and Underwriting Exchange Register (CUE) and the Motor Insurance Anti-Fraud and Theft Register (MIAFTR), where the data is controlled by the Motor Insurers' Bureau, and other relevant databases.
- Employer Liability Tracing Office (for commercial policies containing employer's liability cover)
- Any additional insured parties who may communicate with us on your behalf, provided they have the necessary permission

Do we share data outside the European Economic Area (EEA)?

We may transfer your personal data to organisations located outside the United Kingdom and the European Economic Area (EEA). Where these countries have not been granted an adequacy decision, we ensure that appropriate safeguards are in place to protect your information in accordance with UK GDPR. These may include the use of Standard Contractual Clauses (SCCs), the UK International Data Transfer Agreement (IDTA), the UK Addendum, or Binding Corporate Rules (BCRs).

We also carry out Transfer Risk Assessments where required to ensure that your data remains adequately protected. You can request further information or a copy of these safeguards by contacting us.

When do we make automated decisions about you?

Our Underwriters may make automated decision about you and the automated decision may impact the level of premium you will pay or the type of product that we can offer to you.

Your rights as a data subject

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 use of personal information based on legitimate business interests, including profiling, ask not to be subject to automated decision making if the decision produces legal or other significant effects on you, and data portability. For more details in relation to your rights, including how to exercise them, please contact us.

Please see the www.ico.org.uk for further information on the above rights.

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.