

PRIVACY POLICY

ABOUT THIS DOCUMENT

This document should be read in conjunction with our Terms of Business. The Privacy Policy document explains how we use, store and share your information

PERSONAL INFORMATION

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, financial situation, lifestyle, your health and family health history (**Your Personal Data**). This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

SPECIAL DATA

Where you ask us to assist you, for example with your insurance, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you for information about your ethnic origin, your health and medical history (**Your Special Data**). We will record and use Your Special Data in order to make enquiries of insurance providers in relation to insurance products that may meet your needs.

If you have parental responsibility for children under the age of 18, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

YOUR PERSONAL DATA

Your **Personal Data** means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, National Insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your insurance requirements Your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity
- Bank account details, employment information, details of dependents
- Health status and history, lifestyle information, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "**Criminal Disclosures**"). This is relevant to insurance related activities such as underwriting, claims and fraud management.

We will use Special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Policy.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

HOW WE COLLECT YOUR DATA

We will collect information about you from a variety of sources, but mainly in two ways

- when you request a quote or when you request a quote and apply for an insurance product through our website
- when you call us and provide information over the phone

We may also obtain some information from third parties, for example searches of information in the public domain such as the voters roll. In addition we may also record your activity on the website to understand how easy is to navigate there.

With regard to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

HOW WE USE YOUR DATA

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service
- Submit Your Personal Data to Insurance Product providers, both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that lenders and providers may raise
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any insurance policy you may take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware
- Use your Personal Data for marketing analysis to monitor digital behaviours and to improve, innovate and develop better service together with online experience
- On occasion, we will use Your Personal data for contractual responsibilities we may owe our regulator The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject

SHARING YOUR DATA

From time to time Your Personal Data will be shared with:

- Insurance providers
- Third parties who we believe will be able to assist us with your enquiry or application, or who are able to support your needs as identified. These third parties will include but may not be limited to, our Compliance Advisers, Product specialists
- In the event we sell our business or acquire a new one we will disclose your personal data to prospective buyer or seller

- Our Regulators, law enforcement or fraud prevention agencies

In each case, your Personal Data will only be shared for the purposes set out in this customer privacy notice, i.e. to handle any insurance enquiries and to provide you with our services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages.

SECURITY OF YOUR PERSONAL DATA

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have legal right to such information we will retain records indefinitely.

MARKETING

We may want to send you relevant marketing from time to time.

You may specify your marketing preferences by ticking correct boxes in our website.

YOUR RIGHTS

You can:

- request copies of Your Personal Data that is under our control
- ask us to further explain how we use Your Personal Data
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

YOUR CONSENT

- As detailed above, in some instances, it is necessary for us to collect more sensitive information (such as health or lifestyle information) which is called special category data. This is to allow us to provide you with a product offer. This is where we need to gather your consent to the collection and processing of this data. You can withdraw your consent at any time to us processing this data, however, this may mean that you can no longer access the service or product the information was gathered for
- You may give us the consent to special category data by clicking the “Agree and Apply” button in quote summary subpage on our website

CONTACT WITH OUR FIRM

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

Simplify
Data Protection Officer
Suite F3, Riverview House
Friarton Road
Perth
PH2 8DF
office@gosimplify.co.uk

If we feel we have a legal right not to deal with your request, or to action it in a different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible if you become aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.