



PROFESSIONAL
INSURANCE AGENTS LTD

Head Office
Lion Works
Sidley Road, Eastbourne
East Sussex, BN22 7HB
Tel: +44 (0) 1323 648 000

London Office
Dawson House
5 Jewry Street
London, EC3N 2EX
Tel: +44 (0) 203 857 5270

Privacy Policy

1. Introduction

Professional Insurance Agents Ltd, including its subsidiaries, (also herein referred to as PIA, we, our) take the protection of your privacy very seriously.

This policy (together with PIA's applicable terms of business) has been designed to set out the basis on which we process your personal data that we may collect from you, or that you may provide to PIA when you use our services.

It is important that you review this policy carefully and notify PIA of any queries or concerns that you may have regarding this document.

We define personal data as 'information relating to an identified or identifiable natural person'. When we process your personal data in relation to our insurance services we will act as a data controller and will be legally obligated to comply with the relevant data protection legislation.

We may change this policy from time to time by updating this document. We would advise you to review our policy periodically to keep up-to-date with the latest changes (this document was last updated in May 2018).

2. Categories of personal data that we may collect

PIA offers commercial insurance services and in order to assist with the facilitation of an insurance related request from you, we will need to process your personal data which may include some of the following categories (this is not an exhaustive list and may be updated from time to time):

Your name, date of birth, work and home address, postcode, country of residence, email address, contact telephone number, unique quote reference, unique policy number, unique claims reference, financial information including bank account name, number sort-code, IP address, unique mobile device identifier, mobile device location, mobile device carrier, social media details, e.g. likes and posts, information relating to criminal offences, information relating to your health.

3. Purpose and means

We shall only process your personal data for the purposes of providing you with commercial insurance solutions, including the administration, management and operation of your insurance policies that you may choose to take out via PIA. Statistical analysis might also be conducted as per usual business practice.

We will use email, phone, post, SMS and other electronic means to communicate with you.



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4. Lawful bases

In line with the applicable data protection legislation, PIA must have at least one lawful basis to be allowed to process the personal data of an individual/s.

We have outlined our current lawful bases for processing your personal data and please note that this list may be updated periodically if circumstances change:

Lawful basis	Example situation
1. Consent	We will request your explicit consent prior to including you in our direct marketing campaigns. You are under no obligation to provide your consent to this and any consent given can be later withdrawn at any time upon written notification or selecting the 'unsubscribe feature' on the relevant marketing email.
2. Contractual necessity	In order to obtain insurance quotes or arrange, manage and operate your insurance policy we will need to process your personal data to fulfil the performance of the insurance contract. For example, to set up an insurance policy on your behalf we will need to process your personal data alongside your company's information to allow the Insurer to assess your risk and agree to providing you with cover.
3. Compliance with legal obligations	When acting as your broker we have a legal obligation under the law of tort to owe you a duty of care. In some instances, we may need to bring certain things to your attention to help protect your business which should also help PIA to comply with our duty of care obligation owed to you.
4. Legitimate interest	All companies and organisations have a legitimate interest to retain personal data, which has been processed in accordance with their services, to establish, exercise and defend their own legal rights (e.g. if they are being sued, or they are suing another party).

5. Other organisations that we may send your personal data to

In order to assist with the facilitation of an insurance related request from you, we will need to pass on your personal data to other relevant third-party organisations.

In the interests of transparency, we have devised a non-exhaustive list of the organisations that we work with and with whom your personal data may be forwarded to. Please note that this list may be updated periodically:

- Insurance providers, including Insurers, Underwriters, Managing General Agencies, Brokers and Affiliates/Introducers.
- Service providers, including Marketing companies (e.g. MailChimp), Email quarantine service companies (e.g. MX Guardian), Software providers working for Insurance providers (e.g. Open GI or Acturis), Payment/finance service companies (e.g. SagePay, Premium Credit Limited), IT infrastructure data centres (e.g. UK Servers), IT back-up service companies (e.g. Acronis), Cloud service providers (e.g. AVG Anti-Virus cloud), Post-Code look up services, Website review centres and Google Analytics.
- Other related companies in the insurance industry, including Auditors (working on behalf of Insurers or Regulators), Lloyd's of London, Employers' Liability Trading Office, Sanctions Search (to comply with our legal obligations under financial crime legislation).
- PIA may also disclose your personal data to other organisations if you have asked us to do so, if we are required to do so by law (e.g. a request from a law enforcement agency) or if we need to defend or pursue any of our legal rights (e.g. working with our lawyers).





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6. How long we retain your data for

In line with the relevant data protection legislation we are obligated to only process your personal data for as long as is necessary to fulfil the original purpose, i.e. to assist in the facilitation, management and operation of your insurance policy.

Under general circumstances once you have purchased an insurance policy from PIA we will retain your personal data for a minimum period of 8 years after the expiry of your first insurance policy. This period has been influenced by our legal and regulatory obligations, for example, the FCA require us to retain records for a minimum of 7-years and the limitation period under the Statute of Limitation Act is 6-years and 4-months.

There are some circumstances where a longer period above the general 8-years will apply, for example, Employers' Liability Insurance policy data must be retained for a period of 40-years. In addition, if you have given your consent to allow us to send you direct marketing then your personal data will be retained until you subsequently withdraw such consent.

7. Direct marketing

To help provide you with the highest possible service, there may be some occasions where we will need to inform you of exclusive new products, updates to existing products/exposures and other offers and information in respect of the relevant insurance markets. Updates of this kind may be sent to both existing, former and prospective clients who have provided their consent and don't worry, we will not bombard you with spam/junk mail.

We'll always treat your personal details with extreme care and we will never sell them on to other companies.

We hope that you would like to stay connected with us so we can provide meaningful updates, however, there is no obligation for you to consent to our direct marketing and your consent can be subsequently withdrawn at any time; the quickest way is often to select the 'unsubscribe' button in the relevant email.

8. How we use cookies

A cookie is a small file which asks permission to be placed on to your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies but you can usually modify your browser settings to decline cookies if you prefer. This may however prevent you from taking full advantage of the website.

9. Links to other websites

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over other third parties' websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and any of these sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question. Some brokers and affiliate groups use our Quote & Buy platform.



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10. Transfer of personal data outside the EU

The business world is a global economy. To deliver our services there may be some occasions where your personal data is transferred outside of the EU. Currently, PIA uses MailChimp (marketing software provider) and MX Guardian (email quarantine service provider) who will process your personal data in North America.

When sending your personal data to the insurance market there may be some insurance companies that we work with who will have service providers located outside of the EU, using these firms to process your personal data. We are happy to assist with any queries that you may have regarding this.

11. Your rights

If you live in the European Union, the EU General Data Protection Regulation provides you with a number of rights and these can be requested at any time. We are committed to managing such requests within the applicable time frames and using transparent and clear communication with you.

In respect of our agreement with you regarding the facilitation of commercial insurance, we have selected the key rights that we believe are most applicable to our working relationship and have listed these below. You can view the full list of your rights on the Information Commissioner's Office website.

Under the EU General Data Protection Regulation, you will have the right to request from PIA access to, erasure of or rectification of your personal data, together with the rights of data portability, restriction and objecting to the processing of your personal data and the right to make a complaint to a supervisory authority, e.g. the Information Commissioner's Office.

Often the simplest way for you to make one (or more) of the above requests is to send us an email at info@professionalinsuranceagents.co.uk – inserting 'GDPR right request' in the email subject. You may also send a letter, using 'GDPR right request' as the subject, via post to our Eastbourne Head Office – PIA Ltd, Lion Works, Sidley Road, Eastbourne, BN22 7HB. Please note that charges may apply to complex requests whereby disproportionate effort exists.

If you live outside of the European Union you may have similar rights under your local laws. If this applies to you, please send your relevant request/s via email or post and we will endeavour to handle this as promptly as possible.

12. Other enquiries and complaints regarding data protection legislation

Aside from the 'right requests' under the EU General Data Protection Regulation, all other enquiries should be directed to Graham Hearsey (graham@professionalinsuranceagents.co.uk).

Whilst we hope that you never feel like you need to make a complaint, in the unfortunate event that you do, please send your complaint details in the first instance to Graham Hearsey (graham@professionalinsuranceagents.co.uk).

If you are dissatisfied with our response you have the right to make a complaint or notify such matters to your local Data Protection Authority (DPA).

The Information Commissioner's Office is the relevant DPA in the United Kingdom and can be contacted using the following link – <https://ico.org.uk/global/contact-us/>

If you live outside of the UK you will need to look up your relevant DPA's contact details online.



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