

Introduction

In accordance with the General Data Protection Regulation and related UK data protection legislation, we are committed to protecting the confidentiality and security of the information that you provide to us.

This Privacy Notice is designed to help you understand how we collect and use your information.

We may collect information from you about other people, for example, family members who may drive your car or who may be included on a travel or household insurance policy. If you give us information about another person it is your responsibility to ensure and confirm that:

- you have told the individual who we are and how we use personal information, as set out in this Privacy Policy; and
- you have permission from the individual to provide that personal information to us and for us to use it, as set out in this Privacy Notice.

If you have any questions or queries about this policy please contact us.

Who we are

Pharos (also referred to in this Notice as "we", "us", or "our") means Pharos Insurance Brokers Limited and/or Pharos Insurance Brokers (Kent) Ltd and/or Pharos Holdings Ltd.

How to contact us:

For any questions or concerns relating to this Privacy Policy or our data protection practices, or to make a subject access or any other request regarding the information we hold, please contact us at:

Pharos Insurance Brokers Ltd
Pharos House
Honeywood Road
Dover
Kent CT16 3EH

Tel: 01304 872900

Email: info@pharos.co.uk

Website: www.pharos.co.uk

Lawful bases for processing

Pharos has identified the following lawful bases for processing personal data, which allow us to process personal and sensitive data in order to advise on and arrange an insurance contract on your behalf.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Pharos considers Legitimate Interest as a lawful basis for processing your data in order to provide the service you have requested from us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Under this lawful basis Pharos is acting as an independent intermediary on your behalf in order to advise on and arrange a contract of insurance for you with the recommended insurer.

Comply with a legal or regulatory requirement means processing your personal data where it is necessary for compliance with a legal or regulatory requirement that we are subject to. Under this lawful basis Pharos will process your data in line with the requirements of the Financial Conduct Authority (FCA), the Information Commissioner's Office (ICO) and any other regulatory body where it has remit or application over our business as an Insurance Broker.

Why we need and how we use your personal information

We only collect, use and store your information where we have lawful grounds and legitimate business reasons to do so.

We collect, use and store your personal information in order to fulfil requests for quotes, products and services as part our insurance broking, claims handling and risk management business. It may also be used to verify your identity, to administer payments and to enable us to carry out anti-money laundering and other financial crime checks where required. If you pay by instalments your information may also be used to arrange credit.

The use of your data is essential for us to check your identity, to enable you to enter into an insurance contract and for the insurance to operate (in the event of a claim, for example). We may also use it keep our records up to date, to notify you about changes to our service and to help us in developing new products and services.

If you do not provide the information required we are unlikely to be able to arrange your insurance and may not be able to provide certain services to you.

We may monitor calls, emails, text messages and other communications with you. When you contact us we may keep a record of that correspondence and any information provided to us during that or any subsequent communication. When you visit our website, we may record information about your computer or mobile device, including hardware and software used, general location, when and how you interact with our website. This information is used to monitor the volume of visits and interest in our website and individual website pages, improve customer experience and the performance of the website.

We collect and hold the following types of data for the reasons set out below:

Type of Data	Purpose/Activity	Lawful basis for processing including basis of legitimate interest
Identity Contact details	To register you as a client	To be able to provide our services of arranging and administering a contract of insurance
Risk information (including claims history, previous insurance arrangements, business and financial details).	To establish your demands and needs and facilitate an insurance market review	To be able to fulfil our legitimate interest in 1. Providing our services of giving advice and recommendation about arranging an insurance contract that meets your demands and needs. 2. To provide ongoing service for the duration of the insurance policy.
Identity Contact details Risk information	To keep you informed of changes to your insurance policy, to facilitate mid-term amendments and renewal or to assist	To comply with regulatory requirements. For our legitimate interest in keeping

	you to make a claim.	our records updated to be able to provide our service for the duration of the insurance contract and ensure your arrangement continue to meet with your demands and needs.
Identity Contact details Technical Marketing Risk Information	Where you have completed an enquiry form on our website requesting that we contact you. Use of data analytics to improve our website and monitor usage.	Performance of a contract where you have requested our advice and services before entering into an insurance contract. To allow our legitimate interest in offering our services through our website.
Identity Contact details Risk Information Insurance policy information	To manage our relationship with you and provide advice, services and claim assistance during the insurance policy period.	To allow us to continue to review the performance of the insurance contract in relation to your insurance demands and needs during the policy period and to make recommendations for renewal.
Communications Identity Contact details Risk Information Insurance policy information	Notifying you about changes to our terms of business and/or privacy policy To make suggestions and recommendations to you about other services of a similar nature that may be of interest to you or assist to fulfil your demands needs To advise you of regulatory, legal or market changes that may impact the scope or adequacy of your insurance arrangements or to notify you of new and emerging areas of risk.	To comply with regulatory and legal requirements To allow us to fulfil our legitimate interest of providing our service to you for the duration of the insurance contract and to assist you with making a claim.

Marketing

We would like to keep you updated about our relevant products and services by email, SMS and/or telephone. If we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes we will only do so with your consent. Your consent will be obtained specifically at the appropriate time.

If you have already consented and wish us to stop using your information for this purpose or any other purpose then please contact us.

Nature of personal information

Personal data is any information that may identify a living individual.

We collect personal information such as name, contact details, date of birth, gender, marital status, financial details, employment details and other personal details depending on the nature of the insurance and other services we offer.

We may collect, use and store sensitive personal information such as criminal convictions and medical conditions as necessary in relation to insurances such as motor, home, travel and health insurance. This information may be shared with insurers, insurance product providers and our third party service providers. Where necessary, we shall obtain your consent to the processing of such information.

Sharing information

We will only supply your personal information to other parties where such a transfer is a necessary part of the activities that we undertake, where you give us consent or where we are required to do so by law or regulation (e.g. where the disclosure is necessary for the purposes of the prevention and/or detection of crime).

As an intermediary we must disclose personal information to insurance companies, underwriting agencies, business partners and other parties in order to provide our products and services and to enable you to enter into insurance contracts. Examples of other parties include other insurance intermediaries, loss adjusters, regulatory bodies, legal and accountancy firms involved in the claims handling process. We may also share your personal information with fraud prevention agencies such as the Claims and Underwriting Exchange Register and Motor Insurance Anti-Fraud and Theft Register. We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents and suppliers,

For motor insurance we share it with the Motor Insurance Database (MID) which may be used to establish whether a driver is insured to drive a vehicle and/or for preventing or detecting crime. If you are involved in an accident in the UK or abroad, the MID may be searched to obtain relevant policy information. You can find out more at www.mib.org.uk

We may also disclose your information to service providers engaged to perform services on our behalf. Such service providers are contractually restricted from using or disclosing the information we give them except as necessary to perform services on our behalf or to comply with legal requirements.

We only share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

We may also disclose personal information to new owners of our business in the event that we are subject to a merger or acquisition. Disclosure may also be made to enable company audits, regulatory inspections or to investigate a complaint, suspicion of fraud or a security threat.

We never share your information outside our organisation for marketing purposes.

You understand that we may disclose the information you provide to relevant other parties for the purposes described in this Notice.

Transfer of personal data outside the UK

Certain personal information held on our Information Technology systems may be transferred across geographical borders in accordance with applicable law.

By providing us with your information, you consent to the collection, international transfer, storage, and processing of your information. These transfers are governed by European Union (EU) standard contractual clauses or equivalent data transfer agreements to protect the security and confidentiality of personal information.

How long we keep information about you

We will keep your information for as long as it is required to enable us to provide quotations, administer your insurances, offer renewal and respond to any claims or complaints (which may arise after the period of insurance has expired). This will usually be a minimum period of seven years or otherwise as determined by law or regulation. Once we decide that we no longer need your information it will be securely and confidentially destroyed.

Your data protection rights

You have certain legal rights under UK data protection law and regulations, summarised as follows:

- **The right to be informed** about our data processing activities, including through Privacy Notices such as this.
- **The right of access** to the personal information we hold about you. To request a copy of this information you must make a subject access request in writing to us.
- **The right of rectification.** You may ask us to correct any inaccurate or incomplete data within one month.

- **The right to erasure and to restrict processing.** You have the right to have your personal data erased and to prevent processing except where we have a legal obligation to process your personal information. You should bear in mind that by exercising this right you may hinder or prevent our ability to provide products and services.
- **The right to data portability.** On your request, we will provide you with your personal data in a structured format.
- **The right to object.** You have particular rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for profiling, direct marketing or research purposes.

If you want to invoke any of these rights please write to us:

Pharos Insurance Brokers Ltd, Pharos House, Honeywood Road, Dover, Kent CT16 3EH

Or email: info@pharos.co.uk

Withdrawal of consent

Where you have provided your specific consent to the use of personal data, you may withdraw that consent by contacting us:

Pharos Insurance Brokers Ltd
Pharos House
Honeywood Road
Dover
Kent CT16 3EH

Tel: 01304 872900

Email: info@pharos.co.uk

How to make a complaint

If you wish to make a complaint about how we hold or use your data, please contact us:

Pharos Insurance Brokers Ltd
Pharos House
Honeywood Road
Dover
Kent CT16 3EH

Tel: 01304 872900

Email: info@pharos.co.uk

If you are dissatisfied with how we deal with your complaint, you may contact the Information Commissioner's Office:

The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Tel: 08456 30 60 60 Website: www.ico.gov.uk

Information from other sources

We may use legal public sources such as the electoral roll, HM Treasury Sanctions lists and other third party sources such as credit reference agencies to obtain information about you, for example to verify your identity or check your credit history.

We may also obtain information about you from credit reference agencies and similar third parties. Some personal information may be provided to us by third parties such as insurance companies, other insurance intermediaries and motor vehicle licensing authorities. In some cases you will have previously submitted your personal information to them and given them approval to pass this information on for certain purposes.

Such information will only be obtained from reputable sources which operate in accordance with the General Data Protection Regulation.

We and/or other parties may use your information for purposes such as statistical and trend research and analysis which may include computerised processes which profile you. Automatic profiling helps us understand, predict and forecast customer preferences and to improve the products and services we offer and to assess which products might be most suitable for you.

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal obligations or requirements. The latest version of this policy can be found at: www.pharos.co.uk