



# Privacy Policy

Our Privacy Policy - your rights, your information and how we use it.

Brian Johnston & Co (Insurance Brokers) Ltd [BJIB] is committed to protecting your personal information and, for corporate clients, the personal information of your employees.

Our Privacy Policy contains important information about what personal details we collect, what we do with that information, who we may share it with and why and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy, so please check our website for updates from time to time. If there are important changes such as changes to where your personal data will be processed, we will contact you to let you know.

## Our Details

BJIB is authorised and regulated by the Financial Conduct Authority [FCA]. Our FCA firm reference number is 307689. BJIB is registered in England and Wales and our company reference number is 1997775. We are registered with the Information Commissioner's Office and our registration number is Z8435765.

## How to contact us

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact:

The Data Protection Officer  
Brian Johnston & Co (Insurance Brokers) Ltd  
1-3 Linkfield Corner  
Redhill  
Surrey  
RH1 1BL  
Email: [enquiries@bjins.co.uk](mailto:enquiries@bjins.co.uk)

## Data Protection

We will comply with all applicable requirements of current data protection legislation including the Data Protection Act 1998 [DPA] and the General Data Protection Regulation ((EU) 2016/679) [GDPR] in force from time to time and any applicable national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then any replacement legislation in the UK to the DPA and the GDPR.

## Sensitive Personal Information

"Special categories" of particularly sensitive personal information require higher levels of protection. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent;
2. Where we need to carry out our legal obligations and in line with our Data Protection Policy;
3. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information in the course of legitimate business activities with the appropriate safeguards

## **Information we collect and use**

- Individual Clients - depending upon the services we provide, we may collect and use the following information about you:
  - Name, date of birth, home address, home telephone number, private mobile number, work address, work email address and private email address; bank details, IP address;
  - Vehicle details such as a registration number if the vehicle is subject to an insurance or involved in a claim;
  - Information connected with the product or service provided;
  - Information about your contact with us e.g. meetings, phone calls, emails / letters;
  - Details of convictions, where the conviction has a material bearing on the insurance or service provided;
  - Health information, where the information has a material bearing on the insurance or service provided.
- Corporate Clients - depending upon the services we provide, we may collect and use the following information about you and/or your employees:
  - Name, date of birth, home address, home telephone number, private mobile number, work address, work email address and private email address; bank details, IP address;
  - Vehicle details such as a registration number if the vehicle is subject to an insurance or involved in a claim;
  - Information connected with the product or service provided;
  - Information about your contact with us e.g. meetings, phone calls, emails / letters;
  - Details of convictions, where the conviction has a material bearing on the insurance or service provided;
  - Health information, where the information has a material bearing on the insurance or service provided.

It is important that personal information held is accurate and up to date, it is therefore we should be informed if any personal information changes.

This information will only be collected and used where it is needed to provide our product or service to you or to comply with our legal obligations.

Information you may provide us about other people connected with the service, insurance, or claim.

## **Where we collect your information**

We may collect your personal information directly from you, or for corporate clients from your employees, from a variety of sources, including:

- enquiry, application and claim forms (electronic & paper);
- phone conversations with us;
- information provided by family members or someone acting on your behalf such as a Solicitor
- emails or letters you or your employees send to us;
- meetings with our employees;
- participating in research surveys to help us understand you better and improve our products and services;
- our online services such as websites, social media and mobile device applications.
- Credit reference agencies
- DVLA, HMRC and other government bodies
- Publicly available information such as social media
- Insurers and intermediaries

We may also collect personal information on you from places such as business directories and other commercially or publicly available sources e.g. to check or improve the information we hold (like your address) or to give better contact information if we are unable to contact you directly.

## **What we collect and use your information for**

We take privacy seriously and we will only ever collect and use information which is personal where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- you have given us your permission [consent] to send you information about products and services offered by BJIB;
- it is necessary for us to meet our legal or regulatory obligations;
- where we need to process your information to administer insurance products and services, such as the processing of a claim;
- If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our products or services.

## **Who we may share your information with**

Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers e.g. insurance companies, third party processors such as accident management companies and windscreen companies, as well as software companies used for back-office systems and claims reporting.

Whenever we share personal information, we will do so in line with our obligations to keep information safe and secure.

## **Where personal information is processed**

Personal information is processed in the UK and European Economic Area (EEA). We undertake regular checks on our third-party suppliers to ensure they meet UK / EEA data privacy laws.

## **How we protect your information**

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Personal information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically and must undertake annual training on this.

Our security controls are aligned to industry standards and good practice providing a control environment that effectively manages risks to the confidentiality, integrity and availability of personal information.

When receiving a subject access request will take all reasonable steps to ensure the person requesting the information is entitled to receive it.

## **How long we keep personal information**

We will keep personal information only where it is necessary to provide you with our products or services while you are a customer.

We may also keep your information after this period but only where required to meet our legal or regulatory obligations. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

## **Your individual rights**

You have several rights in relation to how BJIB uses your information. They are:

- **Right to be informed** - You have a right to receive clear and easy to understand information on what personal information we have, why and who we share it with - we do this in our Privacy Policy and privacy notices;
- **Right of access** - You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (DSAR);
- **Right to request that your personal information be rectified** - If your personal information is inaccurate or incomplete, you can request that it is corrected;
- **Right to request erasure** - You can ask for your information to be deleted or removed if there is not a compelling reason for BJIB to continue to hold it;
- **Right to restrict processing** - You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information, but only to ensure we don't use it in the future for those reasons you have restricted;
- **Right to data portability** - You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way. For example, if you were moving your back-office system to another provider;
- **Right to object** - You can object to BJIB processing your personal information where it is based on our legitimate interests (including profiling), for direct marketing (including profiling) and if we were using it for scientific/historical research and statistics.

### **Rights related to automatic decision making including profiling**

You have the right to ask BJIB to:

- give you information about its processing of your personal information;
- request human intervention or challenge a decision where processing is done solely by automated processes;
- carry out regular checks to make sure that our automated decision making and profiling processes are working as they should.

### **How to make a complaint**

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, please contact us using the 'Contact' page at [www.bjins.co.uk](http://www.bjins.co.uk) and we will do our utmost to make things right.

If you are still unhappy, you can complain to the Information Commissioners Office. Their contact details can be found at [www.ico.org.uk](http://www.ico.org.uk).

This version of our Privacy Policy was last updated 2<sup>nd</sup> May 2018.