
PRIVACY STATEMENT

The privacy and security of your personal information is important to us so we want to assure you that your information will be responsibly managed and always protected by us. Please read the document carefully as it sets out how we collect, process and use your personal data. Please contact us immediately if there is anything which you do not understand.

1. About us

Thorntons Financial Services Ltd

Beechwood Park, 42 Prospect Way, Brighouse, HD6 4FF

Tel: 07860 794946

e-mail: thorntonsins@aol.com

www.thorntonsinsurance.co.uk

2. Important information

Our privacy notice sets out how we collect and process your personal data; and provides certain information that is legally required including information about your rights in relation to your personal data.

Our privacy notice relates to personal information that identifies you as a natural person (whether you are an actual or potential customer, an individual who browses our website or an individual outside our organisation with whom we interact). We refer to this information throughout this privacy notice as **personal data** or **personal information**.

This privacy notice may vary from time to time.

For the purposes of relevant data protection legislation, we are a **controller of your personal data**. As a controller, we use (or process) the personal data we hold about you in accordance with this privacy notice.

3. Personal information we collect

The types of personal information we collect will vary depending upon the reason that you are interacting with us and may include the following:

- Contact details: such as your name, email, mailing address, and phone number.
- Identification details: Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number, ID card number, driver's licence number, photographs, or audio or video recordings of you, for example, when you call one of our service centres or visit one of our physical locations.
- Demographic details: such as your date of birth, age, gender, marital status, and insurance requirements.
- Employment information: such as employer, job title, employee number, employment status, salary, ethnicity, employer history, employment benefits, and family details, including their relationship to you.
- Claims details: Information about previous and current insurance claims, (including other unrelated insurances), which may include data relating to claims concerning you or your employer's insurance policy.
- Marketing and communications preferences: such as interests and preferred language. To improve our marketing communications, we may also collect information about interactions with, and responses to, our marketing communications.
- Background checking information: such as inclusion on a sanctions list or a public list of disqualified directors, the existence of previous or alleged criminal offences, or confirmation of clean criminal records, information in relation to politically exposed persons ("PEPs"), only where this information is (i) applicable in the context of the Service you have requested; and (ii) we have obtained your consent, as appropriate.
- Payment information: such as credit or debit card number and bank account details to facilitate payment on behalf of insurers.
- Driving history, certifications and insurance details: such as driving licence details, the period for which a license has been held, existing and previous insurance policy details, previous accident and claims history and details of any motoring convictions, only as part of your application for and administration of the Service to be provided.
- Photographs and video recordings: Images (including photographs and pictures) or video recordings created in connection with our insurance or other business activities, including for claims assessment, administration and settlement, claim disputes, or for other relevant purposes as permitted by law, as well as CCTV recordings captured by equipment on our premises.
- Business Contact Information: Such as your name, employer, job title, business mailing address, business email address, business phone number, and other information necessary for the administration of the relationship between Us and your employer.

We may collect special categories of data (such as health information and criminal history information) as described above. We do so only to the extent necessary for the provision of Services and only if and to the extent permitted by applicable laws. Whenever legally required to do so, we will provide you with a separate notice and request your consent before collecting your sensitive personal information.

If you provide us with personal information relating to other people (e.g., your spouse, civil partner, dependents, beneficiaries, etc.), we will process that information in accordance with this Statement. You are responsible for the accuracy of such information and for ensuring that those people are informed that you provided their personal information to Us and that we will process their personal information in accordance with this Statement.

4. Sources of personal information

We may collect personal information about you from the following sources:

- **Directly from you:** We collect personal information about you when you submit an application for a Service, use a Service, visit our Site, register for or attend an event, or otherwise communicate directly with us.
- **From your employer or representative:** We may obtain personal information about you from your employer or the company with which you are affiliated in order to provide Services to them and/or manage your access to such Services.
- **From a third party acting on your behalf:** We may collect personal information from your family members, financial advisor or representative.
- **From insurance carriers and third-party agent/brokers:** In the event of a claim, we will receive information about you from third parties, including the other party to the claim (claimant/defendant), witnesses, experts (including medical experts), loss adjusters, legal advisers and claims handlers.
- **From other third parties:** To help make sure you receive a competitive quotation, offer of appropriate payment options, protect against fraud and to verify your identity, insurers may use publicly available data which they obtain from a variety of sources including credit reference agencies and other external organisations. Their search may appear on your credit report whether or not your application proceeds.

6. How we use your personal data and the lawful basis for doing so

Where applicable law requires a legal basis for collecting, using, disclosing, or otherwise processing your personal information, this processing is based on the following legal grounds, as applicable:

- as necessary to enter into a contract for Services with you, and to perform our obligations under that contract;
- as required to fulfill the Company's legal obligations;
- as necessary to exercise the Company's rights or defend against legal claims;
- where applicable, as necessary for the Company to pursue our legitimate business interests, such as managing our relationship with our clients, suppliers, and you, maintaining our business records, and improving our products and Services.

Where none of these legal bases applies, or when applicable law requires your consent to the processing described in this Statement, the Company relies on your consent to do so. By providing your personal information to Us as data controller, you consent to Our processing of your personal information as described in the Statement, as it may be modified from time to time.

Special categories of data and criminal convictions: We may also need to collect special categories of data from you such as information about your health, personal data revealing racial or ethnic origin, religious or philosophical beliefs or trade union membership and genetic data. We may also collect information on criminal convictions which we may share with third parties. The lawful basis on which we can do this is the processing is necessary for reasons of substantial public interest relating to insurance purposes. Insurance purposes mean (a) advising on, arranging, underwriting or administering an insurance contract (b) administering a claim under an insurance contract or (c) exercising a right or complying with an obligation, arising in connection with an insurance contract, including a right or obligation arising under an enactment or a rule of law.

Where processing of your personal information requires explicit consent, such as when collecting your sensitive personal information, We will provide you with a separate notice and request your explicit consent.

Sharing information: We may need to pass your personal data to other companies which may include:

- Other companies or brands within our group of companies, for example if we are unable to provide a suitable insurance policy on request or at renewal, we will check if any of our associated group companies can provide you with suitable cover.
- The insurers, intermediaries and third-party service providers that we use for the purpose of arranging and administering your insurance policy. This may also include risk management assessors, uninsured loss recovery agencies, premium finance providers and other third parties involved (directly or indirectly) in the administration of your insurance and its associated benefits.
- Firms that provide administration and processing services to us or on our behalf under contract in order to complete activities such as claims handling, IT systems and administrative services and other activities set out in this privacy notice, as well as support activities such as finance and auditing services.
- Organisations that have a specific role laid out in law, such as statutory bodies, regulatory authorities and other authorised bodies.
- Other organisations where we have a duty to or are permitted to disclose your personal information by law, for example if we received a valid request from the police or other third-party organisation in the interest of preventing and detecting crime.
- Fraud prevention agencies and operators of registers available to the insurance industry to check information and prevent fraud.
- Credit reference agencies to check your credit history. This check will be recorded on your credit reference file without affecting your ability to apply for credit or other financial products.
- Third parties we use to recover money you may owe us, or to whom we may sell your debt.
- Another company, if our business or part of it is bought or taken over by that company to make sure your insurance policy can continue to be serviced or as part of preliminary discussions with that company about a possible sale or take over.

The information you share with us may be transferred by us or any of the types of firms or organisations we have noted above, to other countries in order for processing to take place, including locations outside of the UK. We will only do so if there are adequate levels of protection in place as required by applicable data protection laws.

Please understand that you are not obliged to provide your personal information to Us. However, if you do not provide your personal information, or otherwise do not consent to the processing of your personal information or withdraw your consent to the processing, where your consent is required, We may not be able to provide you with certain Services and may be required to terminate the Services currently provided to you.

7. Your rights

By using our services, you consent to us and our partners retaining any personal information you have provided. We will retain any personal information only for as long as is necessary to fulfil the business purpose for which it was collected. We will also retain and use your personal information for as long as necessary to comply with our legal and regulatory obligations, resolve disputes and enforce our agreements.

You have a number of rights concerning the personal information we use, which you may ask us to observe. In some cases, even when you make a request concerning your personal information, we may not be required, or be able to carry out your request as this may result in us not being able to fulfil our legal and regulatory obligations under the lawful processing conditions under which we hold your data or because there is a minimum statutory period of time for which we have to keep your information. If this is the case, we will let you know our reasons.

You have the right to:

- Ask Us for a copy of any personal information we hold about you.
- Restrict or to object to the use of your personal information at any time.
- Ask Us to correct or delete unnecessary or inaccurate personal information.
- Object to any automated decision, including profiling which may have been used by insurers when underwriting your quotation. Where an automated decision has been made, we will advise you of this and of your rights.
- Provide your personal data in a structured, commonly used, and machine-readable format and to have your personal data transferred to another controller. This right only applies where our processing of your personal data is automated, and the processing took place initially with your consent or for the performance of a contract with you.
- Where we rely on your consent to use your personal information, you can withdraw that consent at any time. Where your consent is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you don't want us to contact you again.

You also have the right to make an enquiry or complaint to the Information Commissioners Office – www.ico.org.uk.

8. Products & services

We may from time to time process your personal data to let you know about similar products and services that may be of interest to you. This is because we value your custom, and we pride ourselves in offering professional and tailored advice which meets your specific insurance needs. This includes keeping you informed on the latest insurance and industry information and details of any offers or promotions relating to the insurance services we provide to you.

Our lawful basis for processing your personal data in this way is necessary to pursue the legitimate interests of our business unless we have otherwise obtained your consent to do so.

We may contact you by post, telephone or e-mail. You will be given the option to stop receiving any communications from us in this regard at any time, however, please note that this will not affect us contacting you about the servicing of products that you have specifically requested from us.