Mark Bates Ltd Privacy Policy

1. Who are we?

Mark Bates Ltd are the broker of the Insurance contract and are authorised and regulated by the Financial Conduct Authority, F.R.N. 308390. The policy is underwritten by China Taiping Insurance (UK) Co. Ltd.

Mark Bates Ltd is a data controller for the provision of this policy.

2. Why we collect your information?

In order to provide you with a quotation or contract of Insurance we need to collect your personal information. We only collect information required to perform the service for which it is being provided.

3. Lawful basis for processing

MBL will rely on the following basis when processing personal data for the provision of the contract and throughout the handling of the policy:

- Consent;
- Contract;
- Vital interests;
- Legitimate interests.

4. How do we use this information?

It may be necessary for us to pass on your information to third parties for the purposes of accepting the contract and handling claims. Your information will be processed in compliance with the provisions of the General Data Protection Regulation (GDPR).

We use your information:

- to share with agencies that carry out certain activities on our behalf (those who underwrite the policy);
- to share with our approved partners where this is required to help deal with your claim or let you benefit from our services;
- to disclose some of your information to any other companies that provide a service to us or you.
- To help conduct governmental surveys on health and social care (Home Employment & PCA customers only)
- Send marketing communications (only where consent has been given)
- Customers may receive occasional service or goodwill messages that are not promotional in nature, for example seasonal greetings or birthday messages. These are sent on a legitimate interest basis and form part of our customer service communication.

Customer data is cross referenced on the Sanctions Register daily to ensure our business continues to comply with the HM Treasury. This is completed internally and your information is not passed to them.

5. Information about or provided by another person

If you are providing us with another individual's personal information (such as a joint applicant) then you should not do so unless you have received their expressed permission. Where you have provided information about somebody else, or where someone has disclosed information about you, we may add it to the information we already possess and it will be used as described in this Privacy Policy. It is unlikely we will have their address, and therefore you must provide them with a copy of this Privacy Policy so that they will know how their data is being used. Additional copies can be supplied upon request.

Where the information for your policy has been provided to us by another person, we will process the policy and provide you with a copy of this Privacy Policy, within one month of the policy being taken out. If we do not have/are unable to hold your address for any reason, we will send a copy of this to the person arranging the insurance with instructions to pass this to you within one month.

6. Third Parties

For the purpose of Insurance your personal information may be passed to, but not limited to; The Insurer, loss adjusters, repair agents, service providers, regulators, payment providers, sub-contractors and subsidiary companies of Mark Bates Ltd as well as Marketing partners that Mark Bates Ltd work with **only if you have given explicit consent**.

7. What information we hold?

In order to provide a quotation or contract of Insurance we ask for the following information: Full name, Date of Birth, Telephone number, Address, Email address.

We hold this information for a minimum of 6 years, after this time your information will be securely destroyed, if you are no longer a customer.

We may also hold sensitive information about you for the purpose of handling your policy or accepting business. This may include pre-existing health conditions, life events and financial credibility.

8. How we protect your data?

We take data protection very seriously. Being regulated by the Financial Conduct Authority and the Information Commissioners Office we have a duty to ensure that all our data is properly protected and as such our IT infrastructure is designed to meet industry standards. Examples of the measures in place include: firewall protection, password protection and cyber security measures.

Staff are trained and monitored on the management of personal data and are required to abide by the principles of the GDPR.

Data protection for Mark Bates Ltd is overseen by Simon Oakes and reviewed on a regular basis. If you have any further questions you can contact us by telephone 01476 591104, email compliance@markbatesltd.com or by post.

Your data may be transferred to a country which falls outside the ICO's scope of adequate countries, however your insurer have the necessary safeguards in place to ensure that all recipients are GDPR compliant. For full details of how your personal data is used and stored by your insurer please visit http://uk.cntaiping.com/uk-privacy/.

9. Controlling your personal information

If you would like to receive marketing from Mark Bates Ltd, we will always require you to 'opt in' to direct marketing and confirm how you wish to receive this. You can remove yourself at any time by contacting our office by post, email or telephone.

We may use your personal information to send out promotional information about current and new policies available which may be of interest you.

10. Your rights

The GDPR provides the following rights for individuals:

- The right to be informed - The right to request details of the data being processed;
- The right to access – The right to be made aware of what details are being held;
- The right to rectification - The right to have incorrect data corrected;
- The right to erasure - The 'right to be forgotten';
- The right to restrict processing - The right to restrict certain processing of data including objecting to personal data being used for direct marketing purposes;
- The right to data portability – The right to have your data transferred to another insurer;
- The right to object – The right to object to your data being processed;
- Rights in relation to automated decision making and profiling.

If you believe that any information we are holding on you is incorrect or incomplete, please telephone, write to or email us as soon as possible. We will promptly correct or delete any information found to be inaccurate.

If you wish to exercise any of the above rights please contact us to start this process.

If you wish to raise a complaint about the way we have handled your personal information, you can contact our Compliance Department at compliance@markbatesltd.com. If you are not satisfied with our response to your complaint or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO).

We may amend this notice on occasion, in whole or part, at our sole discretion. You will be notified about any significant changes using the email or postal address provided and you will be bound by these new terms and conditions, unless you notify us in writing. The current version of the Privacy Policy is available at markbatesltd.com/privacy