



STEPHEN LOWER INSURANCE SERVICES LTD

Stephen Lower Insurance Services Limited

General Insurance Privacy Notice

Version 1803.01

Last Updated: 21st March 2018

Who we are

Stephen Lower, SLIS and SLIS Ltd are working names and trading styles of Stephen Lower Insurance Services Limited, Registered in England and Wales (04930449) and authorised and regulated by the Financial Conduct Authority (628613).

SLIS Ltd is part of the Stephen Lower Insurance Services Holdings Limited (06209099) group of companies (the Group). In this information statement, 'we', 'us', 'our' or 'ours' refers to the Group unless otherwise stated. Members of the Group may change from time to time and you may obtain a list of the current Group companies using the contact details below.

The terms 'you', 'your' and 'yours' means any enquirer, policy holder (including any insurable interests), prospective policy holder, customer, supplier or business partner.

Privacy statement

We are committed to the privacy and confidentiality of the information provided by you to us. This Privacy statement describes how Stephen Lower collects, stores and uses personal information.

We have a legal duty to protect any information that we collect from you, or about you. We use appropriate technologies and procedures to safeguard your details and keep to strict security standards to prevent unauthorised access to it.

Please note that by submitting Personal Data manually or in electronic form to us and/or by using any of our websites, you give your consent that all Personal Data on each occasion that you submit may be processed by, and/or shared within the Group, in the manner and for the purposes described in this Privacy notice.

The terms of this statement may change, so please check it from time to time.

Information we process

You should understand that information you provide, have provided and may provide in future will be processed by us, in compliance with UK data privacy laws for the purpose of providing insurance and insurance quotations, handling claims and/or responding to complaints.

Information containing personal and sensitive personal information

Information we process may be defined as personal and/or sensitive personal information. Personal information is information that can be used to identify a living individual e.g. name, address, date of birth,



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driving licence, passport or national insurance number. Personal information is also information that can identify an individual through a work function or their title.

In addition, personal information may contain sensitive personal information; for example, this can be information about your health, financial history and/or any criminal convictions.

We will not use personal and/or sensitive personal information except for the specific purpose for which you provide it and to carry out the services as set out within this notice.

Collecting electronic information

If you contact us via an electronic method, we may record your electronic identifiers, such as your:

- internet protocol (IP) address
- email address
- Twitter handle
- Facebook profile
- etc

The above list is not intended to be definitive, as methods used to contact us will change over time and technologies will be introduced, change or fall out of favour.

Your telephone company may also provide us with your telephone number.

How we use your information

Your personal and/or sensitive personal information may be used by us in a number of ways, including (but not limited to) to:

- assess insurance and financial risk;
- ensure that you are eligible to hold an insurance policy;
 - For example, that you are not the subject of the UK Government's financial sanctions
- arrange and administer an application for insurance;
- manage and administer the insurance;
- investigate, process and manage claims; and/or
- prevent fraud.

For the avoidance of doubt, personal and sensitive data relevant to your insurance policy WILL be displayed on your Statement of Facts document, which is available to ALL parties with an insurable interest in your insurance policy.

Who we share your information with

We may pass your personal and/or sensitive personal information to relevant third parties, including (but not limited to) insurers; regulators; authorised agents; service providers; reinsurers; other insurers; legal advisers; loss adjusters; your own agents; surveyors and claims handlers.



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We may also share your personal and/or sensitive personal information with law enforcement, fraud detection, credit reference and debt collection agencies, within the Group and with industry-related third parties to:

- assess insurance and financial risks;
- recover debt; and/or
- prevent and detect crime.

We may also share your personal (but not sensitive) data with other relevant parties to allow the normal and smooth operation of your insurance policy. Examples may include (but are not limited to):

- Confirmation that your policy payment has (or has not) been successfully received
- Provision of your contact details (including telephone numbers, email and postal addresses), perhaps to allow a claim to be investigated or progressed
- Provision of copy policy documentation

Typical examples of such data sharing may include providing such details to, about or between:

- Freeholder(s) and leaseholder(s)
- Landlord(s) and tenant(s)
- Leaseholder(s) and nominated representatives of a Residential Management Company or Residents' Association

Why it is necessary to share information

Insurance companies share data for many reasons, including to:

- ensure that more than one claim cannot be made for the same personal injury or property damage;
- check that claims information matches what was provided when the insurance was taken out;
- act as a basis for investigating claims when we suspect that fraud is being attempted; and/or
- respond to requests for information from law enforcement agencies.

Single policy holder point of contact

Whilst there may be many parties associated with an individual insurance policy (for example individual leaseholders within a Block of Flats), we would routinely expect there to be a designated single point of contact for each policy, responsible for making payments to, and communicating with, us. In turn, they would be the sole recipients for all policy documentation and would be responsible for liaising with other interested parties in the policy.

Clearly, such a point of contact will inevitably have visibility of all personal or sensitive data held in respect of the policy and not just their own data.

The transferring of information outside the European Economic Area

In providing insurance services, we may transfer your personal and/or sensitive personal information to other countries including countries outside the European Economic Area. If this happens we will ensure that appropriate measures are taken to safeguard your personal and/or sensitive personal information.

Access to your Information

You have a right to know what personal and/or sensitive personal information we hold about you. If you would like to know what information we hold, please contact the Operations Director at the address listed within this notice, stating the reason for your enquiry. We may write back requesting you to confirm your identity. No charge will be made for processing your enquiry.

If we do hold information about you, we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

If some of your information is inaccurate, you can ask us to correct any mistakes by contacting Stephen Lower Insurance Services Ltd.

Providing consent to store and process your information

By providing us with your personal and/or sensitive personal information, you consent to your information being used, processed, disclosed, transferred and retained for the purposes set out within this notice.

If you supply us with personal information and/or sensitive personal information of other people, please ensure that you have fairly and fully obtained their consent for the processing of their information.

You should also show this notice to the other people.

You should understand that if you do not consent to the processing of your information or you withdraw consent, we may be unable to provide you with insurance services.

Data retention periods

The length of time for which we will hold your data is laid out in our separate **Insurance Data Retention and Record Keeping Policy**.

Changes to this notice

We keep our General Insurance Privacy Notice under regular review. This notice was last updated on the **21st March 2018** and supersedes all prior versions.

Contacting us

If you have any questions relating to this Notice then please write to: The Operations Director at Stephen Lower Insurance Services Ltd, 145 New Dover Road, Capel-Le-Ferne, Folkestone, Kent CT18 7JR, or email to: **data.privacy@stephenlower.co.uk**