

Senate Insurance Brokers - Privacy Notice

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INTRODUCTION

Welcome to the privacy policy of Senate Insurance Brokers Limited.

Senate Insurance Brokers Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when we act as data controller, including when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.

We may also act as a data processor, for example after we have selected a suitable matching insurance provider for you (including a third-party insurance broker) at which point we will send you their onboarding forms for you to fill out and return to us. We will then forward such forms to the insurance provider. In such circumstances, your information will be processed in accordance with that insurance provider's privacy policy. We therefore encourage you to read their privacy policy.

In some instances (for example where your initial application to a matching insurance provider or broker is unsuccessful) we may continue to send your personal information to other insurance companies or brokers for the purposes of finding you a suitable product.

1. IMPORTANT INFORMATION AND WHO WE ARE

Senate Insurance Brokers Ltd is an independent insurance intermediary licensed in Gibraltar by the Financial Services Commission (www.fsc.gi) under licence number: FSC1312B on 16th November 2017. Registered in Gibraltar under company number: 115808. Registered office: Suite 16, Block 5 Watergardens, Gibraltar GX11 1AA.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies you might receive from us and is not intended to override them.

If we need to collect personal data about other people, for example, family members, it is your responsibility to ensure and confirm to us that you have told the individual who we are and how we use personal data in accordance with this Privacy Policy, and that you have their permission to provide us with this information.

Controller

Senate Insurance Brokers Limited acts as the controller and is responsible for your personal data (collectively referred to as “Company”, “we”, “us”, or “our” in this privacy policy) when we provide you with our insurance intermediary services.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

Full name of legal entity: Senate Insurance Brokers Limited

DPO: Kevin Hook

Email address: info@senate.gi

Postal address: Unit 3.27, World Trade Center, Bayside Road

Telephone number: +350 20062100

You have the right to make a complaint at any time to the Gibraltar Regulatory Authority (“GRA”), the Gibraltar supervisory authority for data protection issues (<https://www.gra.gi>). We would, however, appreciate the chance to deal with your concerns before you approach the GRA so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on August 2019. If we modify or update this Privacy Policy, we will post it on our website and notify any of our customers in advance by email.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data includes bank account and payment card details.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We may collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We may also collect information about criminal convictions and offences. Please see the *'Purposes for which we will use your personal data'*.

If you fail to provide personal data

Where we need to collect personal data by law, in order to provide you with our services, or under the terms of a contract, and you fail to provide that data when requested, we may not be able to provide a product or services. In this case, we may have to cancel a product or service but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [Senate - Cookie Policy](#) for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources - see examples as set out below:

Technical Data from the following parties:

- a) analytics providers such as Google based outside the EU;
- b) advertising networks based inside and/or outside the EU; and
- c) search information providers based inside and/or outside the EU.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside and/or outside the EU.

Identity and Contact Data from data brokers or aggregators based inside and/or outside the EU.

Identity and Contact Data from publicly available sources such as Companies House Gibraltar and the Electoral Register based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where the processing is necessary either for the **performance of a contract** which you are a party to or in order to take steps at your request before entering into a contract.
- Where we need to **comply with a legal obligation** – Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests – 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer and verify your identity	(a) Identity (b) Contact (c) Financial	(a) Necessary for our legitimate interests (to obtain your details in order to perform our services) (b) Performance of a contract
To process and deliver your request including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	[(a) Performance of a contract (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing,	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network

system maintenance, support, reporting and hosting of data)		security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To Carry out record keeping and audits	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to carry out internal audits)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To investigate or prevent fraud or other illegal activity	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) To comply with a legal obligation (b) Necessary for our legitimate interests as an insurance intermediary service provider and or public interest reasons.

Special Categories of Personal Data

We may process special categories of personal data (this is information relating to health, race or ethnic origin, philosophical or political beliefs, trade union membership, and genetic data) and data relating to information about criminal offences, where this is necessary as part of the insurance intermediary services we offer, where we have a legitimate interest in doing so (to provide insurance intermediary services), or

where we have otherwise obtained your consent to such processing. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data [Senate - Special Categories](#).

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. 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, if required. 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.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or where we have provided you with products or services or where we have obtained your contact details in the course of a sale or negotiations for a sale of a product or service, and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [Senate - Cookie Policy](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We will only share your personal information with other parties where this 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). We may also disclose your personal information if there is a public duty to or if the disclosure is necessary to protect our interests. As an intermediary we must disclose personal information to insurance companies, underwriting agencies, business partners and other parties in order to provide our services and their products, and to enable you to enter into insurance contracts. Examples of other parties include other insurance intermediaries, brokers/Lloyd's brokers, loss adjusters, regulatory bodies, legal and accountancy firms involved in the claims handling/underwriting process, etc. We may also share your personal information with fraud prevention agencies. We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents and suppliers.

In respect of a joint account or policy, we may disclose personal information to any one of the joint account or policy holders.

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 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. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Certain personal information held on our systems may be transferred across geographical borders in accordance with applicable law. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).
- Where we use service-providers located outside the EEA or in countries that are not deemed to home adequate levels of protection for personal data by the European Commission, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries. (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield. (https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers_en)

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

How long will you use my personal data for?

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 after we cease providing you with services or otherwise as determined by law, commercial considerations, or regulation. Once we decide that we no longer need your information it will be securely and confidentially destroyed.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **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 ratification.** 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.
- **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.
- **The right to data portability.** On your request, we will provide you with your personal data in a structured format.
- **The right to withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.