



WESTMOREINSURE

DATA PRIVACY NOTICE

HOW WE USE YOUR PERSONAL INFORMATION

This privacy notice is to let you know how Westmore Insure Ltd promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

OUR PRIVACY PROMISE

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time. Data Protection law will change on 25th May 2018 This notice sets out most of your rights under the new laws. We'll update it again between now and 25th May 2018 when changes come into effect.

WHO WE ARE

Westmore Insure Ltd is an independent insurance & mortgage intermediary. You can find out more about us at www.westmoreinsure.co.uk If you have any questions, or want more details about how we use your personal information, you can ask us on email at info@westmoreinsure.co.uk or you can call us on 02920 751939

HOW THE LAW PROTECTS YOU

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works. Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Westmore Insure Ltd. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for:	Our Reasons	Our legitimate interests
<ul style="list-style-type: none">• To manage our relationship with you or your business.• To develop new ways to meet our customers' needs and to grow our business.• To develop and carry out marketing activities.• To study how our customers use products and services from us and other organisations.	<ul style="list-style-type: none">• Your consent.• Fulfilling contracts.• Our legitimate interests.• Our legal duty	<ul style="list-style-type: none">• Keeping our records up to date, working out which of our products and services may interest you and telling you about them.• Developing products and services, and what we charge for them.• Defining types of customers for new products or services.• Seeking your consent when we need it to contact you.

<ul style="list-style-type: none"> • To provide advice or guidance about our products and services. 		<ul style="list-style-type: none"> • Being efficient about how we fulfil our legal duties.
<ul style="list-style-type: none"> • To make and manage customer payments. • To collect and recover money that is owed to us. 	<ul style="list-style-type: none"> • Fulfilling contracts. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Being efficient about how we fulfil our legal and contractual duties. • Complying with regulations that apply to us.
<ul style="list-style-type: none"> • To detect, investigate, report, and seek to prevent financial crime. • To manage risk for us and our customers. • To obey laws and regulations that apply to us. • To respond to complaints and seek to resolve them. 	<ul style="list-style-type: none"> • Fulfilling contracts. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect. • Complying with regulations that apply to us. • Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> • To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. 	<ul style="list-style-type: none"> • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Complying with regulations that apply to us. • Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> • To exercise our rights set out in agreements or contracts. 	<ul style="list-style-type: none"> • Fulfilling contracts 	

WHERE WE COLLECT PERSONAL INFORMATION FROM

Data you give to us:

- When you apply for our products and services
- When you talk to us on the phone or in branch
- When you use our websites, mobile device apps or web chat services
- In emails and letters
- In insurance claims or other documents
- In mortgage or insurance reviews

Data from third parties we work with:

- Companies that introduce you to us
- Financial advisers
- Insurers
- Comparison websites
- Social networks
- Fraud prevention agencies
- Estate agents
- Public information sources such as Companies House

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

- HM Revenue & Customs, regulators and other authorities

- UK Financial Services Compensation Scheme

- Credit reference agencies
- Fraud prevention agencies
- Organisations that introduce you to us
- Companies that provide a search engine tool for comparison purposes in relation to insurance and mortgage products
- Insurer and Mortgage lenders directly
- Premium Finance Providers
- Estate Agents
- Surveyors
- Conveyancing Solicitors
- Motor Insurance Database
- Payment processing systems
- If you make an insurance claim, information you give to us or the insurer may be put on a register of claims. This will be shared with other insurers

CREDIT REFERENCE AGENCIES (CRAS)

We carry out credit and identity checks when you apply for a product or services for you or your business. We may use Credit Reference Agencies to help us with this. If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts. We will share your personal

information with CRAs and they will give us information about you. The data we exchange can include:

- Name, address and date of birth
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Make sure what you've told us is true and correct
- Help detect and prevent financial crime
- Trace and recover debts.

We will go on sharing your personal information with CRAs for as long as you are a customer. The CRAs will not give this information to other organisations that want to check credit status. When we ask CRAs about you or your business, they will note it on your credit file. This is called a soft credit search. Other lenders may see this.

FRAUD PREVENTION AGENCIES (FPAS)

We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud and money laundering risks. We use Fraud Prevention Agencies to help us with this.

Both we and fraud prevention agencies can only use your personal information if we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'.

A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime. FPAs can keep personal information for different lengths of time. They can keep your data for up to six years if they find a risk of fraud or money-laundering.

The information we use

These are some of the kinds of personal information that we use:

- Name
- Date of birth

- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your businesses products or services
- Employment details
- Vehicle details
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

IF YOU CHOOSE NOT TO GIVE PERSONAL INFORMATION

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to offer insurance policies or mortgage products. It could mean that we cancel a product or service you have with us. Any data collection that is optional would be made clear at the point of collection.

MARKETING

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this 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 can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time. Whatever you choose, you'll still receive information such as changes to your existing products.

We may ask you to confirm or update your choices, if you take out any new products or services with us in future. We will also ask you to do this if there are

changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will keep your personal information for as long as you are a customer of Westmore Insure Ltd.

After you stop being a customer, we may keep your data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.
- To confirm information in relation to any historical insurance claims

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons.

HOW TO GET A COPY OF YOUR PERSONAL INFORMATION

Under the Data Protection Act you have the right of access to your personal data. The Act allows us to charge a fee of £10 for this service and we will apply this charge until 25th May 2018. There will be no charge after this date. For further details on how to request a copy of your information, please call us on 02920 751939, or write to us at this address:

Westmore Insure Ltd

11 Thornhill Road

Cardiff

CF14 6PD

LETTING US KNOW IF YOUR PERSONAL INFORMATION IS INCORRECT.

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this. If you do, we will take reasonable steps to check its accuracy and correct it.

WHAT IF YOU WANT US TO STOP USING YOUR PERSONAL INFORMATION?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It is not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it. If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

HOW TO WITHDRAW YOUR CONSENT

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

HOW TO COMPLAIN

Please let us know if you are unhappy with how we have used your personal information. You can contact us on 02920 751939 or by email at info@westmoreinsure.co.uk

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern <https://ico.org.uk/concerns/>

FUTURE FORMATS FOR SHARING DATA

The Data Privacy laws will change on 25th May 2018. From that date you will have the right to get your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations. We are working with our industry to improve the way your data is shared.