

Privacy Notice

Important notice

This is the privacy notice of Pound Gates & Company Limited (company number: 03097866). Our registered office is Hyde Park House, Crown Street, Ipswich, Suffolk. IP1 3LG. 'Pound Gates' and 'Pound Gates Chartered Insurance Brokers' are trading styles of Pound Gates & Company Ltd and are together referred to as **we**, **us** or **our** in this privacy notice.

This privacy notice sets out how **we** collect and process your personal data. This privacy notice also provides certain information that is legally required and lists your rights in relation to your personal data.

This 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 and further detail of what this includes are set out in this privacy notice below.

The privacy and security of your personal data is very important to **us** so **we** want to assure you that your information will be properly managed and always protected by **us**. Please read this privacy notice carefully as it explains how **we** may collect and use your personal data.

This privacy notice may vary from time to time so please check it regularly. This privacy notice was last updated on **18th October 2024**.

How to contact us

Controller and contact details:

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.

If you need to contact **us** in connection with the use or processing of your personal data, then you can do so using **our** contact details as set out below.

The Data Protection Representative

Pound Gates & Company Limited
Hyde Park House
Crown Street, Ipswich, Suffolk. IP1 3LG.
Tel: 01473 346046
Email: info@poundgates.com

Information we hold about you and where we obtain this from

We collect personal data to be able to provide **our** products and services to you (for example, arranging your insurance cover or administering a claim on your behalf). Without the information **we** ask for **we** wouldn't be able to provide you with a quotation or administer your insurance policy, and it may affect the outcome of any claim you make.

The personal data that **we** collect may include the following:

- Personal data you provide **us** with in person, via **our** website, by telephone and in writing, including by email
- Personal data you provide when you enquire about insurance, or when you purchase a policy, through **us**, including information about what and/or who you want to insure, such as vehicle details, business activities, your home or travel details
- Personal data you provide when you submit a claim directly to **us** for processing, or where a claim is submitted to **us** on your behalf
- General information about you, such as your name, address, contact details and dates of birth
- Personal data you provide if you subscribe to any of **our** mailing or newsletter services
- Your claims and credit history
- Financial details, such as your bank account and card details
- Criminal convictions
- Information about your use of **our** website such as your IP address, which is a unique number identifying your computer, including personal data gathered using cookies

In addition, **we** may obtain certain special categories of your data (**special categories of data**) and data about criminal convictions, and this privacy notice specifically sets out how **we** may process these types of personal data.

We collect your personal data from you as a controller when **we** obtain quotations for insurance for you, when **we** set up your policy for you and when **we** make changes to your policy for you. This may also involve the collection of data from or about others who are associated with you and your insurance policy such as other persons insured on your policies or your employees or representatives. By giving **us** information about someone else for the purpose of arranging insurance for them under your policy such as a named driver, employee or travel companion etc. you confirm that you have their permission to do so, and that you have shared this privacy notice with them.

By asking **us** to arrange or administer a contract of insurance for you where this involves passing information to **us** relating to children, you confirm to **us** that in doing so you are the responsible guardian of the child or, if not, that you have explicit permission from the child's guardian to share the information with **us**.

We also collect information from publicly available sources and third-party databases made available to the insurance industry for the purposes of reducing fraud and financial crime as well as any other third-party databases where your personal data may be held, provided such third parties have lawful bases on which to share such personal data with **us**.

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

Where we are relying on a basis other than consent:

We may rely on one or more of the following lawful bases when processing your personal data for the following purposes:

Purpose for which we process your personal data	The basis on which we can do this (this is what the law allows)
To perform our contractual obligations to you. This would include meeting your requests for insurance services (including obtaining insurance for you, processing mid-term adjustments and obtaining renewals) and managing your claims	The processing is necessary in connection with any contract that you may enter into with us
To administer your account, including financial transactions for insurance broking	The processing is necessary in connection with any contract that you may enter into with us
To assist in the prevention and reduction of fraud and other financial crime	The processing is necessary for us to comply with the law and our legal requirements
To handle your claim against one of our clients	The processing is necessary to pursue our legitimate interest in fulfilling our contractual obligations with our clients, to protect our clients' interests and to conclude the claim to your satisfaction
In the interests of security and to improve our service, telephone calls you make to us may be monitored and/or recorded	The processing is necessary to pursue our legitimate interest in the management and operation of our business
To let you know about similar products and services that may be of interest to you	The processing is necessary to pursue our legitimate interest in operating our business
To make automated decisions, automated profiling and fraud detection	The processing is necessary in connection with some contracts that you may enter into with us

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 means (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 or law.

Who we pass your personal data to

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

- ▶ Other companies or brands within **our** group of companies
- ▶ 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, loss adjusters 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.

Accessing our website and cookies

When you visit one of **our** websites, **we** may collect information from you such as your email address, IP address (a unique address that identifies a device on the internet or a local network) and other online identifiers. This helps **us** to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit.

We may use third parties to collate IP addresses to help **us** understand **our** Internet traffic data and data regarding your browser type and computer. **We** may also use web usage information to create statistical data regarding the use of our website. **We** may then use or disclose that statistical data to others for marketing and strategic development purposes, but no individuals will be identified in such statistical data.

We may use cookies and/or pixel tags on some pages of **our** website. A cookie is a small text file sent to your computer, mobile phone or tablet depending on the device used to access **our** website. A pixel tag is an invisible tag placed on certain pages of **our** website, but not on your computer. Pixel tags usually work together with cookies to help **us** to give you a more tailored service.

We also use cookies and pixel tags in **our** email communication to personalise the email and track whether the email has been opened and whether the recipient has used any website links contained in the email communication. This allows **us** to monitor and improve **our** email communications and website. Useful information about cookies, including how to remove them, can be found at www.allaboutcookies.org.

Internet browsers normally accept cookies by default, although it's possible to set a browser to reject cookies. However, refusing to accept cookies may restrict your use of **our** website and/or delay or affect the way in which **our** website operates. You can find more information on cookies when you visit **our** website.

The open nature of the internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. While this is outside of **our** control, **we** do take the protection of your information very seriously and aim to always apply appropriate levels of security.

We accept no responsibility for the privacy policies of any sites visitors can access through **our** website.

Your rights

We will only store your data for as long as is necessary to comply with the requirements of your insurance contract(s) and any legal obligations or lawful processing conditions that may exist as a result.

You have several 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 can ask **us** to:

- › Provide a copy of your personal information
- › Correct or delete unnecessary or inaccurate personal information
- › Restrict or to object to the use of your personal information at any time
- › 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

If you have any questions or concerns about this privacy notice or your data protection rights, please contact us using our details set out at the beginning of this privacy notice.

You also have the right to make an enquiry or to complain to the Information Commissioner's Office (ICO) if you are unhappy with our use of your data, or if you think we have breached a legal requirement. Further details about the ICO are available at <https://ico.org.uk>

How we contact you about other products and 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, or to keep you up to date on the latest insurance news and/or risk management advice. This is because **we** value you as a client and are committed providing you with the certainty necessary to help you manage the risks you face. **Our** lawful basis for processing your personal data in this way is as 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**.