Privacy Notice

ABOUT US & HOW TO CONTACT US

i4me ("we", "us", "our") is a general insurance intermediary, offering household insurance products and services to retail customers.

If you have any questions or concerns about this Notice, or require more information, please contact Matthew Durrant (Managing Director) as follows:

- 295 Aylsham Road, Norwich, NR3 2RY
- 01603 786881
- info@i4me.co.uk
- www.i4me.co.uk

THE PURPOSE OF THIS NOTICE

This Notice is designed to help you understand what kind of information we collect in connection with our products and services, and how we will process and use this information. In the course of providing you with products and services, we will collect and process information that is commonly known as personal data. This Notice describes how we collect, use, share, retain and safeguard personal data.

This Notice sets out your individual rights. We explain these later in the Notice but, in summary, they include your right to know what data is held about you, how this data is processed, and how you can place restrictions on the use of your data.

We will process your personal data in line with:

- The UK's updated Data Protection Act 2018, which was initially the UK's enactment of the EU General Data Protection Regulation ('EU GDPR') (https://services.parliament.uk/bills/2017-19/dataprotection.html).
- The UK retained provisions of the EU GDPR (https://gdpr-info.eu/) ('UK GDPR') (retained by virtue of the European Union (Withdrawal) Act 2018).
- Regulations based on wider EU legislation (e.g. the Privacy and Electronic Communications Regulations (EC Directive) 2003 (PECR)) and future updates.
- Wider guidance from the Information Commissioner's Office (www.ico.org.uk).

WHAT IS PERSONAL DATA?

Personal data is information relating to an identified or identifiable natural person. Examples include an individual's name, age, address, date of birth, gender, and contact details.

Personal data may contain information which is known as special category personal data. This may be information relating to an individual's health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to or sexual orientation.

Personal data may also contain data relating to criminal convictions and offences. For the purposes of safeguarding and processing criminal conviction and offence data responsibly, it is treated in the same manner as special category personal data, where we are legally required to comply with specific data processing requirements.

WHAT PERSONAL DATA WE COLLECT & HOW WE COLLECT IT

We will collect your personal data where you request information about our services, customer events, promotions, and campaigns, or when you seek to purchase our products and services. The personal data we collect will depend on our relationship with you. For example, we will collect more detailed data about you if you are a customer than we would if you simply made an enquiry about the products and services we offer.

To enable us to provide you with the right product or service we will collect personal data about you which may include the following:

- Basic personal details such as your name, address, email address, telephone number, date of birth or age, gender, marital status.
- Information about your income and employment, including job title, and business description.
- Information about your mortgage provider.
- Information about your insurance requirements, such as sums insured, details of your home and other information relevant for rating.
- Information about your other policies, such as claims history, quotes history, additional policies held, payment history, and claims data,
- Your payment details.
- Information captured during recordings of our telephone calls.
- Your marketing preferences.
- Special category personal data. This may include information relating to an individual's:
  - Sexual orientation.
  - Sex life.
  - Trade union membership.
  - Political or religious views.
  - Health data.
  - Genetic and biometric data, where processed to uniquely identify an individual.

In the normal course of business, it is unlikely that we will have to process special category data. We do have to collect data relating to criminal convictions and offences because this indicates potential moral hazard to insurers and is therefore part of a fair presentation of risk. These are not considered special category data, but there are similar rules and safeguards for processing it.

We only collect and process special category personal data where it is critical for the delivery of a product or service and without which the product or service cannot be provided. We will therefore not seek your explicit consent to process this data as we require it to provide the product or service you have requested, and its collection is legitimised by its criticality to the service provision. If you object to use of this information, we will be unable to offer you that product or service.

We will obtain your personal data directly from you or someone else acting on your behalf in several ways, including:

- Via your use of our websites.

- Requesting or obtaining a quotation.
- Completing online contact forms.
- Via the telephone, email, post, or social media.
- Face to face.
- Entering competitions.

Where you disclose the personal data of others, you must ensure you are entitled to do so.

HOW WE WILL USE YOUR PERSONAL DATA

We may use your personal data to:

- Administer quotations and policies.
- Decide whether we choose to accept or decline the proposed risk, albeit the final acceptance of risk lies with insurers.
- Calculate your premium and terms.
- Provide you with payment options.
- Process renewals.
- Maintain our records.
- Confirm your identity and prevent fraud.
- Investigate and resolve any complaints.
- Assist insurers and claims handlers with the resolution of any claims you may submit.
- Verify the information you provide.
- Undertake internal quality monitoring and external audits.
- Carry out market research, statistical analysis, and customer profiling.
- Monitor and assess the performance of our advertising.
- Contact you regarding insurance quotations you have not taken up.
- Contact you in advance of your renewal date if we have been unable to provide a quotation in the first instance.
- Create targeting audiences on social media. Prior to doing this, we will ensure that the social media platform has appropriate security facilities.
- Obtain and maintain professional indemnity insurance.
- Report to regulatory authorities.

We may process your personal data for several different purposes, each of which requires a legal basis. We will generally rely on the following legal bases:

- We need to use your personal data to enter into or fulfil our contractual obligations to you. For example, to place appropriate insurance cover, we need to use your personal data to provide you with a quote and determine market placement.
- We have a genuine business need to use your personal data for reasons such as maintaining our business records, keeping records of insurance policies we place, and analysing and improving our business model and services. When using your personal data for these reasons, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal data. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the personal data that we process is classed as special category personal data, we must have one of the following additional legal grounds for such processing:

- It is necessary for an insurance purpose, and it is in the substantial public interest. This will apply where we are arranging an insurance notice, assisting with any claims under a notice, and undertaking any activities to prevent and detect fraud.
- Where the use of your special category personal data is necessary to establish, exercise or defend our legal rights. For example, if legal proceedings are being brought against us or we want to bring a legal claim ourselves.

Where we collect personal data directly from you, we are a "data controller". A data controller means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Where there are other parties involved in underwriting or administering your insurance, they may also process your data in which circumstance we will be a joint data controller of your personal data.

Where we use third parties to process your data purely under our instruction and not on their own behalf, these are known as "data processors". A data processor means the individual or organisation which processes personal data on behalf of the controller.

As a provider of insurance services, we will process the following categories of data:

- Personal data such as an individual's name, address, date of birth, gender, contact details and details of historic claims.
- Special categories of personal data such as health and details on historic claims resulting in injury (physical and physiological).
- Data relating to criminal convictions and offences such as details of driving offences or insurance fraud.

If you object to the collection, sharing and use of your personal data we may be unable to provide you with our products and services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

DISCLOSING OTHER PEOPLE'S DATA

We may collect personal information from you about other individuals for example joint notice holders or someone you authorise to deal with us. If you provide information about another person, you are responsible in ensuring that you have told the individual how we will use their personal information. You will also have permission from the individual to provide their personal information (including any sensitive information) to us to process.

AUTOMATED DECISION-MAKING

As part of our normal sales process, we make decisions in relation your insurance using automated means. The automated process will consider the information that you provide us (e.g. details of the property, postcode, local crime rate), to determine whether your application for insurance can be accepted and what the premium will be. You may request that the decision is reviewed by an individual decision-maker. This is uncommon in practice, but we do sometimes refer cases to insurers.

Other automated decision-making processes could include:

1. Sending customers' information to Professional Office as part of the new business process. Professional Office screens their details against the HMT Sanctions Lists, and again whenever the lists change. We are informed of any full or partial matches. This is part of our anti-financial crime controls.
2. Sending customers' information to Premium Credit Limited as part of the new business process. If they choose to pay by monthly direct debit, we still must pay the full premium to the insurer at outset on their behalf. As a result, they must enter a credit arrangement with PCL, subject to their credit status being satisfactory.

WHO WE MAY SHARE YOUR PERSONAL DATA WITH

- Our insurance partners, such as managing general agents, insurers, reinsurers, or other companies who act as insurance distributors.
- Anyone who acts on your behalf in respect to any insurance notice we have arranged for you.

- Other insurers and insurance intermediaries who provide our own insurance.
- Other third parties who assist in the administration of insurance policies, such as insurers, reinsurers, loss adjusters, claims handlers, accountants, auditors, lawyers, and other experts.
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers.
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime.
- Our regulators.
- Industry bodies such as the Financial Ombudsman Service.
- Debt collection agencies.
- Credit reference agencies.
- Our third-party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers, review collectors and insurance software providers.
- Selected third parties in connection with the sale, transfer, or disposal of our business.
- With your consent, to any other person, firm, body etc not described above.
- See also section below, "Ongoing Services, Marketing, & Online Channels".
- To any other person, firm, body etc not described above, where we are permitted or obliged to do so by law.

You may not have direct contact with all the parties listed above.

DATA PROCESSING ACTIVITIES

We are required to demonstrate that we fully understand our lawful basis for collecting and processing personal data, as well as knowing where it is located and accessed from, the purpose for collecting it, who uses it, for how long it must be retained, and communicating our processing activities to data subjects.

The six lawful bases for processing data are:

1. **Contract:** the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.
2. **Consent:** the individual has given clear consent to process their personal data for a specific purpose.
3. **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
4. **Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations).
5. **Vital interests:** the processing is necessary to protect someone's life.
6. **Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

Data processed is identified according to the reason for processing it, and the lawful basis for processing it. See table below:

Reason for Processing your Personal Data	Lawful Basis for Using your Personal Data	Legal Basis for Using your Special Category Personal Data
To evaluate your insurance demands and needs, and to obtain quotes for you, including providing new quotations and renewal quotations in subsequent years. This may include automated decision-making.	• It is necessary to enter into/perform our contract. • We have a genuine business need (to determine market placement and place insurance cover for you that is in line with your insurance needs).	• It is necessary for an insurance purpose.
To set you up as a customer, including carrying out fraud, credit, and anti-money laundering checks. This may include automated decision-making.	• It is necessary to enter into/perform our contract. • We have a genuine business need (to carry out appropriate credit checks and fraud checks). • We have a legal or regulatory obligation (to carry out appropriate credit checks and fraud checks).	• The prevention and detection of fraud is in the substantial public interest. • It is necessary for an insurance purpose. • It is necessary to establish, exercise or defend our legal rights.
Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services organisations.	• It is necessary to enter into/perform our contract. • We have a genuine business need (to ensure that we take all necessary precautions to prevent fraud). • We have a legal or regulatory obligation (to carry out appropriate credit checks and fraud checks).	• The prevention and detection of fraud is in the substantial public interest. • It is necessary for an insurance purpose. • It is necessary to establish, exercise or defend our legal rights.
Communicating with you and responding to any enquiries you have.	• It is necessary to enter into/perform our contract. • We have a genuine business need (to respond to our prospective and existing customers and keep them updated on any future placing of insurance cover).	• It is necessary for an insurance purpose. • It is necessary to establish, exercise or defend our legal rights.
Complying with our legal or regulatory obligations (such as our requirements to report to the FCA).	• We have a legal or regulatory obligation.	• It is necessary to establish, exercise or defend our legal rights. • It is necessary for an insurance purpose.
Improving quality, training, and security (e.g. with respect to recorded or monitored phone calls to our contact numbers).	• We have a genuine business need (to continually improve our services).	• It is necessary for an insurance purpose.
Managing our business operations, such as maintaining accounting records, analysing financial results, complying with internal audit requirements, and receiving professional advice (e.g. tax or legal advice).	• We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business).	
Monitoring applications, reviewing, assessing, tailoring, and improving our products and services and similar products and services we offer. This includes providing new quotations in the first year after you make a quote enquiry, but you do not proceed, and in subsequent years.	• We have a genuine business need (to market our services).	
Monitoring usage of any of the various i4me websites.	• We have a genuine business need (to assess usage of our website), to help manage our business and	

	to improve our products and services to all customers and website users.	
Tracing and recovering debt.	• We have a genuine business need (to trace and recover any debt which is owed to us).	• It is necessary to establish, exercise or defend our legal rights.
To apply for and claim on our own insurance.	• We have a genuine business need (to have our own insurance).	• It is necessary to establish, exercise or defend our legal rights.

YOUR DATA PROTECTION RIGHTS

You have legal rights governing the use of your personal data. These grant you the right to understand what personal data is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data, to place restrictions on its processing, and to have it deleted.

These rights (listed below) are known as Individual Rights under the Data Protection Act 2018.

- The right to be informed about the personal data being processed.
- The right of access to your personal data.
- The right to object to the processing of your personal data.
- The right to restrict the processing of your personal data.
- The right to rectification of your personal data.
- The right to erasure of your personal data.
- The right to data portability (to receive an electronic copy of your personal data).
- Rights relating to automated decision-making including profiling.

We may not be able to comply with your request (such as where this would conflict with our obligation to comply with other regulatory and/or legal requirements). However, we will respond to you, and tell you why we cannot comply with your request. For example, your right to request erasure must be balanced against other factors, such as our regulatory and/or legal obligations which mean we cannot comply with your request. When we have no ongoing legitimate need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. We have a regulatory obligation to retain data for specified minimum periods, but there are no specified maximum retention periods. We therefore reserve the right to retain data indefinitely for the reasons given herein.

There may also be circumstances where exercising some of these rights (such as the right to erasure, the right to restriction of processing) will mean your insurance can no longer be provided and it may therefore result in cancellation of your notice. You will therefore lose the right to bring any claim or receive any benefit, including in relation to any event that occurred before you exercised your right. Your notice terms and conditions set out what will happen in the event your notice is cancelled.

When exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

The flow of data within the insurance sector is complex, and we ask you to keep this in mind when exercising your rights of access. Where we may be reliant on other organisations to help satisfy your request, this may affect timescales.

You can ask to exercise your rights at any time. As mandated by law, we will not charge a fee to process these requests; however, if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee. We will determine this at the time of the request(s).

INTERNATIONAL DATA TRANSFERS

We primarily store and manage personal data within the United Kingdom.

Our core systems, including our back-office client management system, store client information and documentation on servers located in the UK. Email records are backed up to cloud storage via Microsoft on servers located in the UK.

In limited circumstances, it may be necessary for personal data to be processed outside the UK, for example where we use approved third-party service providers to support specific business functions such as secure meeting transcription and note-taking. Where this occurs, data is primarily stored within the UK or EU and may be subject to limited processing outside the UK, including in the United States.

Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place in accordance with UK data protection law, including the use of the UK International Data Transfer Addendum, Standard Contractual Clauses, and, where applicable, reliance on the UK Extension to the EU–US Data Privacy Framework, to ensure that your data remains appropriately protected.

HOW WE PROTECT YOUR DATA

To protect your data, we use a range of organisational and technical security measures.

Where we have given you (or you have chosen) a password, you are responsible for keeping this it confidential. Please do not share your password with anyone.

Within i4me, we restrict access to your information to those who need to know it for the purposes set out above.

We use firewalls to block unauthorised traffic to our network.

ONGOING SERVICES, MARKETING, & ONLINE CHANNELS

Primarily, we will only contact you about products we manage for you, services we provide to you, and matters relevant to these. This may be by post, email, phone, or SMS.

We may also occasionally contact you about other financial promotions or with other marketing material that we think might be appropriate for you. You can tell us to stop at any time by calling us, emailing us, or writing to us.

We may use and share information from or with online sources, such as websites and social media. This information may be used to help tailor and improve our services and communicate with you effectively, as we believe many customers use a range of media channels.

We may create targeting audiences on social media. Prior to doing so, we will ensure that the social media platform has appropriate security facilities. However, we still recommend that you routinely review the privacy notices and preference settings that are available to you on any social media platform.

If you input data into any of our websites, e.g. if generating a quotation, we may share some of this in a privacy-friendly with third parties (such as search engine providers) as “hashed” data. This sharing is to measure the performance of our advertising.

Where we use or share information from or with these sources, we will respect any permissions you have advised about how you want your information to be used.

DATA WE COLLECT THROUGH COOKIES & SIMILAR TECHNOLOGIES

We collect information through cookies and other similar technologies (e.g. pixel tags or links), in order to remember you when you visit one of our websites and help us improve your online experience. These help us understand how you and others use our websites, view our products, and respond to our advertising, so we can tailor direct marketing and enhance our overall product and service offering.

When you receive direct marketing from us via email, we may use technology as described above to determine your use of and interest in our direct marketing.

When you visit one of our websites, we may record your device information, including hardware and software used, general location, when and how you interact with our websites. This information is retained for direct marketing purposes.

DATA-RELATED COMPLAINTS

You have the right to complain to us about our collection and use of your personal information. To make a complaint, please contact us by email, telephone, or in writing. You may also complain to the Information Commissioner's Office (ICO – the UK's data protection authority) at any time, by contacting them at www.ico.org.uk.