



# Insurance by Simply



## Our Privacy Notice

# Simply

*Insurance by Simply is a trading style of Simply Commercial Services Ltd which is an appointed representative of Simply Lending Solutions Ltd. Simply Lending Solutions is authorised and regulated by the Financial Conduct Authority FRN:745164*

## Our Privacy Notice

This notice covers our requirement to provide you with information on how and why we use your personal data and your rights under the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

## Personal Information

This privacy notice tells you what to expect when Simply Commercial Services Limited collects personal information about you.

Personal Information denotes:

- Information you provide us with by completing a proposal form
- Information that you provide us with over the telephone, via email or face to face

By providing us with information about yourself, you are considered a Data Subject. If during this process you provide us with information about another person, in doing so, you confirm that they have given your permission to provide it to us and that we may use their personal data in the same way as your own as set out in this privacy notice.

## The Data Protection Principles

As we are responsible for gathering and using your personal information, we have to follow strict rules called the data protection principles. As such, we must make sure that your information is:

- ✓ Used fairly and lawfully in a transparent manner
- ✓ Used for explicit and legitimate grounds only
- ✓ Used in a way that is adequate, relevant and not excessive
- ✓ Accurate and kept up to date
- ✓ Kept for no longer than is absolutely necessary
- ✓ Handled according to your rights
- ✓ Kept safe and secure
- ✓ Not transferred outside the [European Economic Area](#) without adequate protection

## Who Is Responsible For Your Personal Information

Simply Commercial Services Limited, as the Data Controller (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data is, or is to be, processed.

Data Controllers must ensure that any processing of personal data for which they are responsible complies with the Act.

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## Legal Basis For Processing Your Personal Information

We are required to have a lawful basis in order to process your personal data and the relevant bases which apply:

Purpose of Processing	Lawful Basis
Providing quotations, arranging and administering insurance policies	Necessary for the performance of an insurance contract
Provision of information on products and services	Our legitimate interests or your explicit consent
To notify you of changes to our service	Our legal and regulatory obligations
To prevent and detect fraud, money laundering and other financial crimes	Our legal and regulatory obligations

## Why We Gather Personal Information About You

To meet our contractual obligations and provide you with financial advice, we will need to gather and process certain information about you. This may include sensitive personal data including information about your physical or mental health and existing and past medical conditions.

### Processing includes:

- ✓ Obtaining
- ✓ Recording or holding
- ✓ Transferring this information to other companies associated with us

### We will use your personal information for the following purposes:

- ✓ To provide you with financial advice in relation to insurance policies
- ✓ To arrange and administer your insurance policy if you buy one through us
- ✓ To assess your health status if you are applying for certain financial products
- ✓ For fraud prevention
- ✓ To help prevent financial crime
- ✓ For audit purposes

## Who Do We Share Your Details With and Why

To meet our contractual obligations to you and to also meet our regulatory we may need to share your personal information with product and service providers, fraud and crime prevention agencies, the Financial Conduct Authority, the Financial Ombudsman Service, the Government, solicitors, credit reference agencies, another regulatory body and external compliance auditors.

We may also be required to pass your personal information to parties located outside of the European Economic Area in countries that do not have data protection laws equivalent to those here in the United Kingdom. Where this is the case, we will take reasonable steps to ensure the privacy of your information.

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You may be assured that we and any company associated with us will treat all personal information as confidential and will not process it or retain it other than for a legitimate purpose.

We will take steps to ensure that the information we hold is accurate kept up to date and not kept longer than necessary. We will take steps to safeguard against unauthorised or unlawful processing, accidental loss, accidental destruction or damage to the information.

## Personal Credit Checks

When you ask us to obtain quotations for personal insurance products, you should be aware that some of the insurers we approach will carry out personal credit checks as part of the underwriting process. This means they will review information held by a credit reference agency. Whilst a record of the search will be added to your credit record, we are advised this will not have any detrimental effect on your credit rating or history.

To comply with Consumer Credit legislation, providers of personal credit are required to carry out affordability assessments before making advances of credit. This means that whenever we are asked to arrange personal premium finance, we will pass your name, address and date of birth to the finance provider, to enable it to carry out an assessment. In assessing your application, the provider may search information held by a credit reference agency. Please note the credit reference agency will add details of the search and your application to their records, whether or not your application proceeds

## How Long Do We Keep Your Information

We will not keep your information any longer than is necessary. If we provide you with financial advice, your data will be kept in accordance with FCA regulatory expectations which in some cases means the duration could be indefinite.

## Your Rights

You have rights under the new Data Protection Act. Please ask us for an explanation of each should you wish to have more information:

- ✓ The right to be informed
- ✓ The right of access
- ✓ The right to rectification
- ✓ The right to erasure
- ✓ The right to restrict processing
- ✓ The right to portability
- ✓ The right to object
- ✓ Rights to automated decision and profiling

## Your Right To Access

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You have the right to access any information we hold about you, and the right to know why that data is being processed, how long it's stored for, and who has had or has access to it.

You will not be charged for us supplying you with this information however we do reserve the right to apply a reasonable fee where requests are deemed excessive.

We will respond to any such request within the maximum time frame allowed of one month.

### **If You Send Us An Email**

Any email you send to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

### **If You Make A Complaint to Us**

If we receive a complaint, we make up a file containing the details of the complaint. The file is likely to contain the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to investigate and process the complaint.

We usually have to disclose the complainant's identity to whomever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute.

We also usually have to disclose details of the complaint to our professional Indemnity Insurance Broker and Insurer.

We may also be required to provide a copy of the file to the Financial Ombudsman Service should an adjudicator be required to consider the complaint.

We are required to disclose high-level analytics to the Financial Conduct Authority (FCA) concerning the number and nature of any complaints we receive. This data does not include names or details that identify the specific data subject.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for 3 years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

### **Use of Data Processors**

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Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

### **If You Have A Complaint**

If you have any concerns about your rights and our practices in relation to data protection, please contact us directly. We will aim to respond to your concerns and clarify how we have processed your information and with whom. We will also endeavour to put right anything that's gone wrong.

If you are still dissatisfied after contacting us, you may report your concern to the Information Commissioner's Office by contacting them as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)

### **How To Contact Us**

For further information on how your information is used, how we maintain the security of your information and your rights to access the information we hold on you or if you would like to make a complaint, you can write to us, email us, or call us as follows:

Adam Hinder  
Office 17 Runwell Hall Farmhouse  
Hoe Lane  
Rettendon Common

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Essex  
CM3 8DQ

Tel: 01245 400356  
Email: info@simplysg.co.uk

### Your Declaration

I confirm receipt of this document and that I have read and understand the contents contained therein.

Client 1 Name:	_____	Client 2 Name:	_____
Client 1 Signature:	_____	Client 2 Signature:	_____
Date of Issue:	_____	Date of Issue:	_____



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## Your Consent – Marketing

Occasionally, we may send you marketing / promotional communications via email, telephone or the post. We will only send information to you where we feel it to be appropriate to you. Recipients will be carefully selected. Please tick your choice below:

Client 1	I wish to OPT IN to receiving communications or marketing material electronically or through the post	
Client 1	I wish to OPT OUT to receiving communications or marketing material electronically or through the post	
Client 2	I wish to OPT IN to receiving communications or marketing material electronically or through the post	
Client 2	I wish to OPT OUT to receiving communications or marketing material electronically or through the post	

## Withdrawing Consent

If at any time you wish to withdraw consent for us, or any company associated with us, to processing your personal or sensitive personal data, or to stop us contacting you with marketing material, please contact us by email or in writing as follows:

Adam Hinder  
Simply Commercial Services Ltd  
17 Runwell Hall Farmhouse  
Hoe Lane  
Rettendon Common  
CM3 8DQ

Email: [info@simplysg.co.uk](mailto:info@simplysg.co.uk)

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