

## PRIVACY NOTICE

### About us

Independent Health Care Solutions Limited (“we or us”) a company registered in England and Wales under number 3056697, whose registered office is at Pasga House, Brow Lane, Shelf, Halifax, HX3 7QJ.

This notice primarily covers how we use data relating to our customers, prospects, website visitors and people who interact with or do business with us. In these cases, we will be the “data controller” for the purposes of data protection law.

Where we process personal and sensitive or special data, we comply with statutory data processing requirements as set out by the Data Protection Act 2018.

### What information we collect

If you purchase services from us, communicate with us, or do business with us, this will result in us collecting personal data about you such as your name, email address, postal address, postcode, gender, date of birth, employment details, job title, daytime and/or mobile phone number, financial information (when ordering products only) and other personal details depending on the nature of the insurance and other services we offer.

We may collect, use and store sensitive personal information such as medical conditions as necessary in relation to insurances such as travel and health insurance. This type of information is defined by the Act as special or sensitive personal data. By providing this information, you signify your consent to its being processed by us in arranging and administering your insurances. In the event that you provide us with any sensitive personal data, we will take extra care to ensure your rights are protected.

### How we collect Information:

We collect relevant information during our meetings, emails or telephone conversations with you and through the completion of application/proposal forms and fact finds.

We may monitor calls, emails, text messages and other communications with you.

We may collect personal and special or sensitive information from you about other people, for example your own family members or company employees and their family members who may be included on an insurance policy. If you give us information about another person it is your responsibility to ensure and confirm that:

- you have told the individual who we are and how we use personal information; and
- you have permission from the individual to provide that personal information to us; and
- for us to use it to carry out our business on their behalf.

We sometimes collect additional information about actual or prospective customers from third party sources. Most of the time this won't be personal data (for example, we might obtain information about a company's business and performance), though on occasion we may receive personal data (such as a person's work email or telephone number, or details of their role within a business).

### How we use your information

We only ever use your personal data with your consent, or to the extent necessary to:

- provide you with information about our services;
- deal with your enquiries and requests:
- to fulfil requests for insurance quotations;
- enter into, or perform, a contract with you;
- comply with a legal duty;
- administering your insurance policies;

- to enable us to carry out anti-money laundering and other financial crime checks where required
- remember your preferences e.g. if you ask not to receive marketing material, we will keep a record of this, or
- for our own (or a third party's) lawful interests (such as marketing, internal record keeping, market research or to improve our products) provided your rights don't override these.
- generate anonymous reports about use of the IHCS Website and its features

By contacting us by email, telephone or via the website, you are consenting to us contacting you to discuss our services and provide further information. We will only use your information for the purpose it was collected (or for similar/related purposes).

If you do not provide the information required, we are unlikely to be able to arrange your insurance and may not be able to provide certain services to you.

### **Sharing Data:**

As an intermediary we must disclose personal information about the persons to be insured to insurance companies, underwriting agencies, business partners and other parties in order to provide our products and services and to enable you to enter into insurance contracts.

Personal information provided by you may be put onto a register of claims and shared with other insurers to prevent fraudulent claims.

Disclosure may also be made to enable company audits, regulatory inspections or to investigate a complaint, suspicion of fraud or a security threat.

We may also disclose personal information to service providers engaged to perform services on our behalf. For example, our IT system providers who supply our client database system and network support. 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 only share the personal data provided if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

We never share personal data outside our organisation for marketing purposes.

You understand that we may disclose the personal data you provide to relevant other parties for the purposes described in this Notice.

### **Marketing**

We would like to keep you updated about our relevant products and services by email 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. 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.

### **Your rights**

We want to ensure that you remain in control of your personal data. Part of this is making sure that you understand your legal rights, which (for individuals) are as follows:

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of it (this is known as a subject access request)
- the right to have inaccurate data rectified
- the right to object to your data being used for marketing or profiling.

You also have a right to "be forgotten", this means you can ask for the information which we hold to be deleted from our records but this will mean that we will be unable to continue to handle your insurance arrangements.

If you would like further information on your rights or wish to exercise them, please write to: The Data Protection Officer at the IHCS, Pasga House, Brow Lane, Shelf, Halifax HX3 7QJ or emailed to [info@ihcs.co.uk](mailto:info@ihcs.co.uk).

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner's Office, which oversees data protection compliance in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk).

### **Data Retention**

We will keep your information for as long as it is required to enable us to provide quotations, administer your insurances, offer renewal, respond to any claims or complaints (which may arise after the period of insurance has expired and for accounting and regulatory purposes and record keeping. This will usually be a minimum period of six years or otherwise as determined by law or regulation. If we consider there is a need to store records for longer (for example, the transaction has been the subject of a dispute or claim) then we will retain the data for as long as is necessary.

If you make an enquiry that does not result in a business transaction, we will ask if we may retain your details in order to promote our services to you in future. If you decline, we will retain information provided to us by prospective clients for 3 months for the purposes compliance monitoring, after which it will be removed from our systems.

We store logs of outbound emails for up to 36 months after the email is sent for the purposes handling abuse complaints and compliance monitoring.

Once we decide that we no longer need your information it will be securely and confidentially destroyed.

### **Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of our website and to compile statistical reports on website activity. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result. Website visitors who disable cookies can still contact us by telephone, email and fax.

### **Links to other websites**

Our website may contain links to other websites. This privacy policy only applies to our website so when you link to other websites you should read their own privacy policies.

### **Social networking**

Our Website may offer you the opportunity to share or follow information about the Website (or the products and/or services available through it) using third party social networking functionality (such as through "share this", "like" or "follow" buttons).

We offer this functionality in order to generate interest in our Website among the members of your social networks, and to permit you to share and follow opinions, news and recommendations about the Website with your friends. However, you should be aware that sharing personal or non-personal information with a social network may result in that information being collected by the social network provider or result in that information being made publicly-available, including through Internet search engines.

Please note that we do not exercise any endorsement or control the policies or practices of any third-party social network whose functionality you may access through our Website. You should always read the privacy policy of any social network through which you share information carefully in order to understand their specific privacy and information usage practices.

### **Complaints/spam**

Under the GDPR, you have the right to lodge a complaint with the Supervisory Authority, the Information Commissionaires Office (ICO), who are the national authority responsible for the protection of personal data. A complaint can be made to the ICO via their website: [ico.org.uk](http://ico.org.uk) or through their helpline: 0303 123 1113.

If you have a received an email or other communication sent by us that you believe is spam or in violation of our acceptable use policies, please contact us at [info@ihcs.co.uk](mailto:info@ihcs.co.uk)

### **Questions**

Any questions about your personal data or this notice should be directed to the following address: The Data Protection Officer, IHCS, Pasga House, Brow Lane, Shelf, Halifax HX3 7QJ or emailed to [info@ihcs.co.uk](mailto:info@ihcs.co.uk).

### **Changes to this statement**

Our privacy policy may be updated from time to time and the latest version will always appear on the IHCS website.