

PRIVACY NOTICE

About Sovereign Insurance Services

Sovereign Insurance Services are a member of the Sovereign Group of companies and are authorised and regulated by the Gibraltar Financial Services Commission to act as a General Insurance Intermediary.

General Data Protection Regulations

The General Data Protection Regulations (GDPR) was introduced into the EU from 25th May 2018 to provide greater control over the use of personal data. The underlying principles of GDPR are similar to the previous Data Protection legislation. However, the GDPR contains more specific requirements for the use and protection of personal data than the pre-existing legislation.

Under the GDPR, personal data is defined as:

“any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

We are required to notify you with the following information regarding the processing of personal information relating to you.

How We Will Use the Information That You Give Us

We will only use your information to:

- Arrange and administer your insurance contract;
- Conclude payments and other policy-related transactions;
- Meet our contractual obligations to you;
- Report claims and assist you during that process.

Where we need to pass information to other firms, it will only be for that purpose. These firms will be other insurers, other insurance brokers, and firms handling claims and will also include firms that process or administer our records.

Some of the personal data you provide to us may be more sensitive in nature and is treated as a Special Category of personal data. This could be information relating to health or criminal convictions and may be required by us for the specific purposes of underwriting or as part of the claims-handling process. The provision of such data is conditional for us to be

able to provide insurance or manage a claim. Such data will only be used for the specific purposes as set out in this notice.

If you are providing us with another person's personal information in connection with a quote for insurance, you should ask them to also read this Privacy Policy. By giving us information about another person you are confirming that they have given you consent to provide the information to us.

When we contact you, it will either be for the above reason, or we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business, and which does not materially impact your rights, freedom or interests. This will also assist us to provide you with the best customer experience through ensuring that we offer you the most appropriate products and services. For any other marketing it will only be with your consent and you will be able to withdraw your consent or unsubscribe easily at any time.

If we have to transfer information to a third country outside the EU, we will only do if a similar level of protection applies in that country. If we need to obtain information which is by nature sensitive, we will only do so on the basis that it is in the public interest – for example, to fight crime, prevent fraud or to make sure insurance is available.

We will use your data to send you communications required by law, or which are necessary to inform you about changes to the services that we provide you.

What Type of Personal Information Do We Need?

- We need your name, gender, date of birth, and contact details, and other data that is necessary to meet your request.
- We might also need to collect details of criminal convictions.
- We will only collect what is necessary and will only keep it for as long as we are required to do in line with relevant laws and our Data Retention Policy. A copy of the Data Retention Policy can be sent to you on request.

What is the Legal Basis for processing your Personal Data?

We process the above data for the “performance of contract”, or “legitimate interest”, and we process information about medical conditions, or health on the basis of “substantial public interest”.

How Do We Obtain Your Personal Information?

- We may gather it from information you submit to a website by proposal form, by 'phone, face-to-face, or by email.
- We may receive it from insurers, other insurance brokers, and firms handling claims or firms that process or store our records.
- When you engage with us on social media.
- When you have given a third party permission to share with us the information that they hold on you.

What Are Your Legal Rights Regarding Your Personal Data?

- To be informed of what data we hold on you and the use to which it will be put.
- To request access to the personal data we hold on you, free of charge.
- To ask us to correct or update your information.
- To request that we transfer your data to other providers.
- To request that we delete your information or stop using it. There may be legal, contract or financial reasons for retaining your data as set out in our Data Retention Policy.

Complaints

If you are unhappy about how we have used your data, please contact us. If we are unable to deal with your issues, you have the right to complain to the Gibraltar Regulatory Authority. Please contact them at www.gra.gi, or by 'phone on +350 200 74636.

Information Requests

Enquiries in relation to Data held by Sovereign Insurance Services should be directed to Managing Director, Sovereign Insurance Services using the contact details shown above. Enquiries may be made in person, by 'phone, or by e-mail.