



PRIVACY NOTICE FOR CLIENTS

Keystone Legal Benefits Ltd is a company:

- Incorporated in England & Wales, number 02307623.
- Authorised and Regulated by the Financial Conduct Authority, number 313653.
- Registered under the Data Protection Act Z4709949.
- Certified to ISO27001:2013 (Information Security Management System), certificate number 10443 by UKAS.

1. CONTACTING US

If you wish to exercise your rights or have a complaint about our use of your data, please email info@keystonelegal.co.uk

Alternatively, you can write to us at FAO: Keystone Legal Benefits Ltd, Beaumont House, Auchinleck Way, Aldershot, Hampshire, GU11 1WT.

2. PERSONAL INFORMATION WE COLLECT AND WHY WE COLLECT IT

We act as your agent and will collect data, including personal information and risk details, solely to enable us to obtain and provide insurance quotations, arrange and administer your insurance. Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are contractual obligation, and for our legitimate business interests as an insurance broker.

We will be unable to offer any quotation or insurance if you refuse to provide certain personal data, including health, financial and criminal records data which is collected under the lawful basis of public interest, where these would affect the provision of cover and/or performance of insurance contracts.

For the purposes specified within this privacy statement, we collect and process the following information:

- Contact details: information that allows us to contact you directly such as your name, email address, telephone/mobile numbers and addresses. We may contact you for instructions (if you are a client or a person authorised to give instructions to us by a client);
- Identification documents: information such as passport, driving licence, utility bills, identity cards, signature, etc.
- Correspondence: including details of your existing insurance policy with us and other documents and files.
- Financial information: bank accounts details, payment and receipt details, financial status;
- Advisors relating to your case: including, Solicitors, Medical Reporting agencies etc;
- Records of your interactions with us: such as any enquiries or complaints you make, telephone conversations, letters and other correspondence (including e-mail).;
- Your marketing preferences: so that we know whether and how we should contact you about similar products and services.

3. HOW WE PROCESS YOUR DATA

We regard the lawful and correct handling of personal information by the firm as an essential element in achieving fair treatment of customers and to maintaining confidence between those with whom we deal and ourselves. We therefore need to ensure that our organisation treats personal information lawfully and correctly. To this end, we fully endorse and adhere to the Principles of data protection, as set out in the Data Protection Act and General Data Protection Regulations.

In this respect, personal information:

1. shall be processed fairly and lawfully and, in particular, shall be processed only in accordance with our stated privacy policy;
2. shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
3. shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
4. shall be accurate and, where necessary, kept up to date;
5. shall not be kept for longer than is necessary for the specified purpose(s);
6. shall be processed in accordance with the rights of data subjects under the Act;
7. should be subject to appropriate technical and organisational measures to prevent the unauthorised or unlawful processing of personal data, or the accidental loss, destruction, or damage to personal data;
8. shall not be transferred to a country or territory outside the UK unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Therefore, the firm will, through appropriate management and strict application of criteria and controls:

1. observe fully conditions regarding the fair collection and use of information;
2. meet its legal obligations to specify the purposes for which information is used in the disclosure documentation provided to customers, obtaining consent for any marketing activities that we intend to provide;
3. collect and process appropriate information only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements;
4. ensure the quality of information used, regularly checking its accuracy;
5. ensure that the information is held for no longer than is necessary for the purpose for which the data was originally collected, subject to our legal and regulatory obligations and legitimate business interest to protect and defend the company from litigation;
6. ensure that the rights of people about whom information is held can be fully exercised under the Act (i.e. the right to be informed that processing is being undertaken, to access one's personal information; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information);
7. take appropriate technical and organisational security measures to safeguard personal information;
8. ensure that personal information is not transferred abroad without suitable safeguards.
9. To assist in achieving compliance with the Principles for Business of the Financial Conduct Authority:
10. appoint an Information Security/Data Protection Officer (as stated on the first page of this document) at a senior level with specific responsibility for data protection and information security assets within the firm who will be responsible for providing staff with guidance on data protection procedures.

4. HOW WE COLLECT YOUR INFORMATION

We will collect personal information from a number of sources. These include the following:

- Directly from you: from yourself, when you register to become a client of ours, complete forms we provide to you, use our website, make a claim, make a complaint, provide identification, contact us by phone, email or communicate with us directly in some other way;
- Third parties authorised by you: a family member or someone else authorised by you;
- Our website: provides us with information about how you use it;
- Your professional advisors: such as solicitors, Medical Reporting agencies etc.; We may also collect additional personal information throughout the period of the policy through to policy expiry.

5. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

Your information will be held securely by us and shared with insurers, which could include reputable providers in other countries, to enable them to provide accurate terms and they will also obtain data about you and your insurance history from various insurance anti-fraud databases, such as the Claims and Underwriting Exchange (CUE) as well as publicly available websites and credit referencing agencies.

We will not give anyone else any personal information except on your instructions or authority, or where we are required to do so by law, or our regulatory requirements. Information about you and your insurances will be securely stored on our database while you are a client and for a minimum of three years, and in certain circumstances up to ten years, after expiry of your policies. We will then dispose your information by deleting it from our secure system.

6. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

Under the Data Protection Act, the rights of data subjects include the following:

Data Subject Right to Rectification

If a data subject contacts the firm advising that the information held about them is inaccurate or incomplete, the firm must refrain from processing (ie. using, but not storing) the data, until it has been verified or rectified. The business encourages customers to check and correct data as disclosure is an essential element in ensuring any policy provided by the company will protect the customer.

Full notes of any allegedly incorrect information will be kept on the customer record and, although there is a 30 day period in which to rectify information once notified under the DPA, in practice this must be carried out as soon as possible and confirmed to the customer in writing (email or letter) along with the impact on their insurance of any such change.

Data Subject Right to Erasure (Right to be Forgotten)

The right to erasure is extremely limited where the data subject is a customer of the business due to the legal obligation on the firm to retain customer data for a minimum period of 3 years under FSMA and the firm's legitimate business purposes for retention to 6 years from lapsing. Once the firm has no lawful basis for holding data it must be deleted and our policy below indicates the relevant periods for which we will hold data.

Data subjects do, however, have the right to erasure where their data is being held on the basis of consent (such as previous quotations or for marketing purposes) or their data has been processed

unlawfully (such as where data has been obtained/ purchased from a third party that did not have the right to pass on that data)

Any request for erasure must be passed to the company's data protection officer for review and appropriate action.

Data Subject Right to Restrict Processing

Individuals have the right to request that we restrict the processing (but NOT holding) of their personal data where:

- they allege inaccuracy of the data being processed (see right of rectification, above);
- data is being unlawfully processed;
- the individual has raised a formal objection to our processing of data (see Right to Object, below);
- or where the individual requests you refrain from deleting their data in order to establish or defend a legal claim (NB. In these circumstances the relevant data must be stored in a location and manner which prohibits processing of data)

Any request for restriction of processing must be noted on the file and passed to the company's data protection officer for review and appropriate action.

Data Subject Right to Object to Processing

Again, this is a limited right which only applies in specific circumstances. Primarily in the case of Insurance Intermediaries it will be a specific right to opt-out of marketing communications.

Where a customer opts not to receive marketing communications, or, as a consumer, has not opted-in this must be noted on the client screen and their details must be removed from any marketing lists (Zywave, Brief Your Market etc). Confirmation should be sent to the marketing manager or data protection officer.

In other cases of objection, where the firm has a lawful basis for continued processing, this must be referred to the data protection officer to evaluate whether the firm's legitimate grounds should override the data subject's objection.

Data Subject Right to Portability of Data

The right to data portability gives individuals the right to receive personal data they have provided to us in a structured, commonly used and machine-readable format. It also gives them the right to request that we transmit this data directly to another controller, however it is important to understand that the right to data portability only applies to personal data.

The right applies where the lawful basis for processing is consent or for the performance of a contract, the latter of which would apply to most of our data for individuals.

Any request for data portability must be noted on the file and passed to the company's data protection officer for review and appropriate action.

You are NOT required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

7. COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

To see a list the cookies we use and why we use them click [here](#) to view our cookie policy.

8. LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.