



## **Privacy Policy**

MG Underwriting is a trading name of MG Insurance Consultants Limited. We are a private limited company incorporated in England and Wales. Our registered company number is 03315805.

We are an insurance intermediary dealing both directly with our own customers or policyholders where the relationship has been arranged by a separate broker. We deal with your agent or broker and assist them in arranging insurance for you with our insurer panel. As part of this process we will receive and process personal data provided to us by your agent/broker.

We recognise our responsibility to treat your personal information with care and to comply with all relevant legislation, in particular the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).

This notice covers our requirement to provide you with information on how and why we use your personal data and informs you of your rights under the legislation.

### **Data Controller**

For the purposes of the legislation, MG Insurance Consultants Ltd is a “data controller”. We will process your personal data for the purposes set out below. Our contact details are shown at the end of this notice.

As explained later, your data may be passed to other parties, including insurers, for the purposes of arranging your insurance. These parties could also be data controllers and where necessary will issue their own Privacy Policies and/or make them available via their websites.

### **What information do we collect about you?**

We collect the following data:

- General information such as your name, date of birth, gender, relationship to the customer (where you are not the policyholder), identification information such as your national insurance number, passport number or driving licence number
- Contact details including address, telephone number and email address
- Information about your job including job title, business description, education, employment history and professional certifications
- Information relating to the advice that you request or the services that we are providing. For example, we might need information relating to your previous insurance policies and claims history

- Information which is relevant to the insurance policy we have placed, or any claims made under it. For example, where we have placed property insurance for you, we will hold information about your property and the individuals living there
- Information obtained from requests for policy amendments which may reveal changes in your personal circumstances that are relevant to the insurance policy we placed
- Financial information such as your financial history and needs, income, bank details, payment details and information obtained as a result of our credit checks
- Financial information obtained if you request cancellation of your insurance policy and any information relating to the cancellation
- Information obtained when we carry out checks of sanction lists
- Information obtained through our use of cookies
- Information captured during recordings of our telephone calls

#### **What special categories of information will we collect?**

- Details of your current or former physical or mental health if it is relevant to your claim or insurance policy
- Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information if it is relevant to your claim or as a result of carrying out sanction checks
- Any other special categories of information you offer when communicating with us about your claim. We will only process such information to the extent necessary in connection with your claim or policy or where in connection with legal proceedings.

#### **How do we collect your data?**

- Directly from you, the policyholder
- From other third parties involved in the insurance transaction such as another broker or insurer
- From other third parties involved in the relevant insurance policy or claim such as other claimants, witnesses to an incident, loss adjusters, claim handlers and medical experts
- Via publicly available sources such as internet search engines and social media sites
- Via insurance industry fraud prevention and detection databases, and screening tools for sanctions or credit checks
- From government agencies such as the DVLA or HMRC and from professional regulators

**How will we use your data?**

We collect your data so that we can:

<b>Quotation/inception</b>
<ul style="list-style-type: none"> <li>• Setting you up as a client, including possible fraud, sanctions, credit and anti-laundering checks</li> <li>• Evaluating the risks to be covered and matching to appropriate policy/premium</li> <li>• Payment of premium where the insured/policyholder is an individual</li> </ul>
<b>Policy administration</b>
<ul style="list-style-type: none"> <li>• Client care, including communicating with you and sending you updates</li> <li>• Payments to and from individuals</li> </ul>
<b>Claims processing</b>
<ul style="list-style-type: none"> <li>• Managing insurance and reinsurance claims</li> <li>• Defending or prosecuting legal claims</li> <li>• Investigation or prosecuting fraud</li> </ul>
<b>Renewals</b>
<ul style="list-style-type: none"> <li>• Contacting you to renew the insurance policy</li> <li>• Evaluating the risks to be covered and matching to appropriate policy/premium</li> <li>• Payment of premium where the insured/policyholder is an individual</li> </ul>
<b>Other necessary purposes outside of the insurance policy lifecycle</b>
<ul style="list-style-type: none"> <li>• Complying with our legal or regulatory obligations</li> <li>• General risk modelling</li> <li>• Transferring books of business, company sales and reorganisations</li> </ul>
<b>Marketing</b>
<ul style="list-style-type: none"> <li>• Sending you information about other products and services from MG Insurance Consultants Ltd we think may be of interest to you</li> <li>• Sending you risk management information that we think will help you to identify and mitigate the risks in your business</li> </ul>

### **Legal basis for processing your data**

All processing (i.e. use) of your personal information is justified by a lawful basis for processing. In the majority of cases, processing will be justified on the basis that:

- The processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract (e.g. where we help an employer to fulfil an obligation to you under an employment contract in relation to the delivery of employment benefits)
- The processing is necessary for us to comply with a relevant legal obligation (e.g. where we are required to collect certain information about our clients for tax or accounting purposes, or where we are required to make disclosures to courts or regulators)
- The processing is in our legitimate commercial interests, subject to your interests and fundamental rights (e.g. where we use personal information provided to us by our clients to deliver our services, and that processing is not necessary in relation to a contract to which you are a party).

In limited circumstances, we will use your consent as the basis for processing your personal information, for example where we are required to obtain your prior consent in order to send you marketing communications.

Before collecting and/or using any special categories of data or criminal record data, we will establish a lawful exemption which will allow us to use that information. This exemption will typically be:

- Your explicit consent
- The establishment, exercise or defence by us or third parties of legal claims
- A context specific exemption provided for under local laws of EU Member States and other countries implementing the GDPR, such as in relation to the processing of special category data for insurance purposes, or for determining benefits under an occupational pension scheme.

### **How do we store your data?**

We store some customer data in the UK in encrypted form on equipment we fully own and control. Data stored and processed on our online systems is stored on equipment leased by Google in the EU.

Your data will not be retained for longer than is necessary and will be managed in accordance with our data retention policy. In most cases the period will be for a maximum of 7 years following the expiry of an insurance contract unless we are required to retain the data for a longer period due to business, legal or regulatory requirements.

We may transfer your personal data to destinations outside the European Economic Area (EEA). Where we do we will ensure that it is treated securely and in accordance with the Legislation.

### **Who will we share your data with?**

As a necessary part of providing you with the services described above or in our legitimate interests we may we may need to disclose your personal data to certain third parties.

- Premium finance companies
- Computer bureaux/software houses
- Insurers
- Other insurance intermediaries
- Insurance industry databases
- Government databases
- Credit agencies
- Regulatory authorities
- The Police and other law enforcement bodies

We never share your information outside our organisation for marketing purposes.

### **What are your data protection rights?**

Under the legislation you have the following rights in relation to our processing of your personal data:

1. The right to be informed about how we use your personal data (This Privacy Policy)
2. The right to see a copy of the personal information we hold about you. (In most cases this will be free of charge)
3. The right to have personal information rectified if inaccurate or incomplete
4. The right of erasure of your personal information where there is no compelling reason for its continued processing
5. The right to restrict processing in certain circumstances e.g. if its accuracy is being contested.
6. The right to data portability which, subject to certain conditions, allows you to obtain and reuse your personal data across different services
7. The right to object to certain processing including for the purposes of direct marketing
8. Rights to information in relation to automated decision making and profiling

### **What are cookies?**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **How do we use cookies?**

Our company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website
- Interacting with you via live chat services

### **How to manage cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

### **Privacy policies of other websites**

Our website may contain links to other websites from time to time. Our privacy policy applies only to our website, so if you click on another website, you should read their privacy policy.

### **Changes to our privacy policy**

We keep our privacy policy under regular review and update this document accordingly. This privacy policy was last updated on 17<sup>th</sup> July 2019.

### **How to contact us**

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.



MG Insurance Consultants Limited  
Staley House  
Hassall Street  
Stalybridge  
Cheshire  
SK15 2LF

Tel: 0161 304 9933

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

You may contact us directly or via your agent/broker.

**How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that we have not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

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

Tel: 0303 123 1113