



**LeagoldMiller**

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#### **OUR PRIVACY POLICY**

The General Data Protection regulations (GDPR) which will be incorporated in law on 25th May 2018 are far stronger than previous data protection for the individual.

As a company Leagold Miller take the security, privacy and confidentiality of all Client Data extremely seriously.

Under GDPR there are 3 parties to the equation: The Client, The Processor and the Controller. Leagold Miller as a Broker and Financial Advisers are deemed a Processor and also a Controller of data.

The Processor element is because we take your data direct from the information you volunteer, in order that we may provide you with the right and appropriate insurance or financial advice for your needs.

Processing means obtaining, recording (in written or electronic forms) holding information, carrying out and administrating the servicing of any operation or set of operations from the information or data provided.

Leagold Miller as the Controller will hold or store all insurance and financial services related data be it from Clients, Financial Service Providers or Insurers, both, on our premises and in the cloud. It is accepted and has always been the case that the information collected is confidential and will only be used by parties who are involved with the underlying risk or financial advice.

The Insurers and financial services providers we deal with will also be deemed Controllers and if we arrange funding for the purposes of general insurance, the bank or finance provider will also be deemed a controller.

GDPR requires all Processors and Controllers to detail how the Customers, information is collected, stored and used by whom and where. Consent is integral and the refusal to give consent to use the information will handicap the ability to secure the necessary cover or advice.

Whilst Leagold Miller and the respective Insurers and Financial Service Providers are therefore deemed joint controllers. When it comes to the placement of the individual risk or investment implementation each party will act independently of the other. Leagold Miller is a fully independent Broker and Financial Adviser.

We may collect both, personal and sensitive information about you, business partners, employees and family members if on the same policy or investment.

This information is necessary in order to provide your insurance policy or investment products and to protect you against fraud.

As is already the case, transparency whilst integral does not reduce the necessary confidentiality between Broker/Financial Adviser and Client and Broker/Financial Adviser and Insurer/Financial Services Provider.

#### **How is this information used?**

GDPR has been established to protect specifically your privacy as an individual and prohibit the ability of others to use your personal information without your consent. Personal information is perceived as information that can identify you as an individual specifically. Either via a telephone or credit card number along with anything that sources itself back to you as a private individual and now it has been written into law. Please note, Information already in the public domain stays there.

We as your Broker/Financial Adviser need your information to carry out our legal and regulatory obligations to secure your purchase of the necessary insurance or financial services products you have requested. We only use the information collected for the purposes of supplying Insurers/Financial Services Providers with sufficient data to volunteer a price for the cover requested. When you request premium funding, we will also supply the finance providers we use with your information. Where there is a claim, your information may also be given to the necessary assessors, garages, other professional advisers or contractors by us so that the claim can be handled effectively.

#### **How do we collect and hold information?**

We collect client information via email, phone, post or in person. We will ask numerus questions which will be entered into our system and held in our data base, the information will then be sent electronically or by post to Insurers/Financial Services Providers. Any paper communications sent via post or Fax are scanned and added to the respective file.

All information on our records relating to you will be treated at all times as Private and Confidential and will only be disclosed to others such as Insurers, Financial Service Providers, Finance Providers, and other parties who are directly involved in arranging and administering your insurance, Financial Products and Premium Finance.

It must be understood that Leagold Miller only has responsibility to protect your data whilst we hold it.

#### **Cookies**

A cookie is a type of information that a website puts on your computer, in order to remember something about you at a later time.

When someone visits our website, we use cookies to track the number of visitors to our website and to help us improve the overall visitor experience. These cookies do not collect or store any personally identifiable information.

You may delete and block all cookies from our website but parts of the site may not work as a result. If you prefer us to not collect, you may refuse the use of cookies.

#### **Your rights**

##### **From 25th May 2018 onwards, you have the right to:**

**Access your personal information:** If requested and deemed reasonable, a copy of the personal information we hold about you will be provided by electronic means once you have established proof of who you are. If you have requested the data to be provided by post, this will be accommodated where ever possible.

**Rectification:** If you believe the information we hold about you is incorrect, then please contact us to amend it as soon as possible.

**Erasure:** If we, the Controller, can no longer provide a legitimate reason for storing the respective data, then you have the right to request that it is removed.

It is our policy to store information pertaining to the insurance risks and financial advice we provide indefinitely. However, we may remove data from our records which we no longer require at our discretion.

**Restriction of processing:** You are entitled to ask us to stop using your information where you feel it may be inaccurate or where you feel we no longer need to process your personal information.

**Data portability:** You can request we transfer your information to another party of your choice in a readable format. Once transferred the new party becomes responsible for looking after your personal data.

**Object to Direct Marketing:** Leagold Miller only markets directly where we feel the information contained within will include the recommendation of new products, which we determine to meet our client's demands and needs, or which we determine would be useful to them based on our knowledge of the client.

We do not pass on your details for the purposes of marketing to any other party.

**Object to automated-decision making:** Many Insurers and Financial Service Providers will group enquiries such as locality, age, claims history etc. to determine the premium to be charged. If you want to opt out of automatic decision-making it is your right, but dependent on the way Insurers are set up it may mean they can't offer a manual quote or policy, as some decisions are purely automated and the lower price offered by them as a result, may not be available.

**Withdraw consent:** You have the right to withdraw consent to further use of your information, but this will handicap our ability to secure access to the Insurers and Financial Service Providers we need to place your cover with or provide you with financial advice.

**Lodge a complaint:** You have the right to complain to the Information Commissioner about the way we use your personal information. They can be found on the Information Commissioners website: <https://ico.org.uk>

Please note: Whilst you have every opportunity to exercise your rights listed above, we may not always be able to comply with your request due to legal or regulatory requirements. We will always reply to your request and make you aware why we may not be able to comply.

#### **Changes to our Privacy Policy**

We may revise this Privacy Policy from time to time and will place any updates on this website as well supply a hard copy if requested.

#### **Finally**

Trying to make GDPR simple to understand is extremely hard, but we hope the above makes clear how Leagold Miller collects your data, what we do with it, and how we seek to keep it secure, along with a clear and concise explanation of your rights.

Leagold Miller cannot be responsible for the privacy policies of other companies and we recommend you always check the privacy policy of each company you trade with.