

Privacy Notice

Introduction

This privacy notice provides you with details of how we collect and process your personal data.

Alexander Margolin t/as Sioma Insurance Consultants an Appointed Representative of KPTI Ltd T/a IS Insurance Solutions registered in England (Reg No - 3944038) and are authorised and regulated by the Financial Conduct Authority (FCA) (formerly the Financial Services Authority). Their Financial Services Register number is 310450.

Alexander Margolin t/as Sioma Insurance Consultants and **KPTI Limited t/a IS Insurance Solutions (KPTI Limited)** are the data controllers and we are responsible for your personal data and have created this privacy policy statement to demonstrate our firm commitment to safeguarding the privacy of our customers and website visitors.

Our email address: info@isgroupuk.com or alexander@sioma.co.uk
Telephone Number: 020 8205 3000
Our postal address: 235/241 Kingsbury Road, London NW9 8UG

What information do we collect and process?

We only ask for information that we need, and have strict controls to keep it safe. We collect, store and use to provide you with our services as Insurance Brokers. Without this information we cannot give you a quote or an insurance recommendation and it may also affect the outcome of any claims you make.

Personal information we collect will be held in digital and/or paper files. We have provided some examples of information we collect (therefore not all information sought will be listed below).

We will collect information that is relevant to enable us to deal with the enquiry such as:

- ❖ Name, address, other contact details (e.g. email and telephone details), gender, marital status, date of birth, criminal or any other convictions and claims history.
- ❖ We will also collect information which relates to things you want to insure (for example your house, business or vehicles) This includes information relating to any quotes or renewal invitations you receive, or purchases you make, of the products and services we offer, as well as changes you make to your quotes, policies or claims.
- ❖ Financial information such as payment card number, bank account number and account details income and other financial information.
- ❖ Information about health – for some products such as private medical insurance we need to know your health status, any previous or past medical conditions, your smoking and consumption of alcohol.
- ❖ We will use your sensitive personal data for the purposes of providing our services to you or if we need to comply with a legal obligation. Some example of these are racial or ethnic origin, political opinions, genetic or biometric data and data concerning an individual's sex life.
- ❖ We receive personal data from various sources such as, Employers, Government Agencies, Electoral Registers, Individuals and their family members, insurers, other intermediaries, loss adjusters and claim handlers.

Legal Grounds

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

These legal grounds are set out in the General Data Protection Regulation (the GDPR), which allows companies to process Personal Data.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at info@isgroupuk.com or alexander@sioma.co.uk. if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
<p>Quotations</p> <ol style="list-style-type: none"> 1) Establishing a client relationship, including fraud, anti-money laundering and sanctions checks 2) If applicable checking credit risk 3) Collecting information to enable us To recommend Insurers in terms of policy, risk and premium 	<p>Identity Contact</p>	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Compliance with legal obligation ➤ Legitimate interest of KPTI Limited to ensure that the client is within our acceptable risk profile ➤ To assist with the prevention of crime and fraud ➤ Credit reference Agencies
<p>Renewals</p> <ol style="list-style-type: none"> 1) Contacting you and take your instruction to arrange the renewal of an insurance policy 2) Risk and quote assessment 3) Collecting information to enable us to recommend Insurers in terms of policy, risk and premium 	<p>Identity Contact Profile Usage Marketing and Communications Technical</p>	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ KPTI Limited's interest with clients to arrange the continuation of cover ➤ Legal interest of KPTI Limited to assess the risk to enable placing this with appropriate Insurers
<p>Policy & Claims Administration</p> <p>To process and deliver your policy including:</p> <ol style="list-style-type: none"> 1) Collection or refunding premiums, fees and charges 2) Collect and recover money owed to us 3) Processing and facilitating other payments or premium finance arrangements 4) To enable us to correspond and communicate with our clients in respect of policies 5) Managing and Liaising with Insurers in respect of claims 	<p>Identity Contact Financial Transaction</p>	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Necessary for our legitimate interests to recover debts owed to us ➤ Ensuring our clients are able to meet their financial obligations

Purpose/Activity	Type of data	Lawful basis for processing
<p>Client Care</p> <p>To manage our relationship with you which will include:</p> <ol style="list-style-type: none"> 1) Notifying you about changes to our terms or privacy policy 2) General client care, including communicating with clients 3) To make suggestions and recommendations to you about goods or services that may be of interest to you 	<p>Identity Contact Profile Marketing and Communications Technical Usage</p>	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Necessary to comply with a legal obligation ➤ Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services ➤ Necessary for our legitimate interests to develop our products/services and grow our business
<p>Advertising & Marketing</p> <ol style="list-style-type: none"> 1) Where relevant to deliver remove relevant content and advertisements to you and measure and understand the effectiveness of our advertising 		<ul style="list-style-type: none"> ➤ Necessary for our legitimate interests to study how customers use our products/services, to develop them and to grow our business
<p>Compliance & Legal Obligation</p> <ol style="list-style-type: none"> 1) Complying with our legal or regulatory obligations 	<p>Identity Contact Technical</p>	<ul style="list-style-type: none"> ➤ Compliance ➤ Legitimate interest of KPTI Ltd to take steps to ensure legal and regulatory compliance
<p>Website</p> <ol style="list-style-type: none"> 1) To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) 2) To use data analytics to improve our website, products/services, marketing, customer relationships and experiences 	<p>Identity Contact Technical Usage</p>	<ul style="list-style-type: none"> ➤ Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise ➤ Necessary to comply with a legal obligation ➤ Necessary for our legitimate interests to define types of customers for our products and services, to keep information updated and relevant, to develop our business and to develop our marketing strategy

Using your personal data

Personal data we collect will be used to:

- ❖ Administer and assist you with your quotes, policies and claims.
- ❖ Send statements and invoices to you, and collect payments from you.
- ❖ Create and inform you of products or services that may better meet your needs.
- ❖ Send you general (non-marketing) commercial communications.
- ❖ Send you email notifications which you have specifically requested.
- ❖ Send you newsletters and other marketing communications relating to our business or the businesses of carefully selected third parties which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology
- ❖ Deal with enquiries and complaints made by or about you.

You can inform us at any time if you no longer require marketing communications to be sent by emailing us at info@isgroupuk.com.

Consent

We need to collect sensitive data about you in order to arrange insurance cover and or assist in dealing with a claim. We rely on the data subjects consent to process this sensitive information such as criminal convictions and medical data. The consent allows us to share the information with other insurers and intermediaries that need to process the information in order for them to undertake their role in the insurance market.

The individual's consent is necessary for KPTI Limited to provide services the client requests.

If you provide information about a person other than yourself, you agree to notify them of our use of their Personal Data and to obtain such consent for us.



You may withdraw your consent for this by contacting the following persons:

Mr Vijay Rawal
KPTI Ltd t/a IS Insurance Solutions
235-241 Kingsbury Road
London
NW9 8UG
Phone: 020 8205 3000
Email: vijay@isgroupuk.com

Mr Alexander Margolin
Alexander Margolin t/as Sioma Insurance Consultants
235-241 Kingsbury Road
London
NW9 8UG
Phone: 020 8205 3000
Email: alexander@sioma.co.uk

*If consent is withdrawn it may prevent us to provide services to you. If you withdraw consent to an Insurer, it may not be possible for the insurance cover to continue.

Providing information to third parties

KPTI Limited will not sell, trade or rent your information for the purposes of direct marketing.

We will never disclose information about you to third parties, except to fulfil your specific instructions for a product or in the event that third parties deliver the relevant service. For example, if you take out an insurance policy provided by a third party, they will need your details in order to administer the policy and process any claims.

Similarly, if you choose to spread the cost of your insurance over the year, your payment details may be passed to a third party company to set up and administer the financing for your premiums. KPTI Limited does not currently retain any of your debit or credit card payment details.

Other circumstances where we are operationally or contractually obliged to pass on your information may be where third parties administer part or all of the service, underwriting, for pricing purposes, testing, and to maintain management information for business analysis.

We will supply the third parties with information such as the effective date of any insurance policy which you purchase through us and any premiums (including any renewal premiums) paid for that policy. They will only use this information for internal business and accounting purposes to invoice KPTI Limited.

Other disclosures

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we may disclose information about you:

- to the extent that we are required to do so by law, and
- to the purchaser, or prospective purchaser, of any business or asset which we are, or are contemplating, selling.

Please note that in addition to information as provided in this privacy policy, we will disclose Personal Data to:

- IT service providers, contractors, advisers, agents that perform activities on our behalf for the purposes of meeting your requirements.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Insurers, Premium Finance Providers, Claim handlers, Loss Assessors or Adjusters, Health Care professionals, Anti-Fraud Databases

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

International data transfers

Some of our third party providers are businesses outside of the EEA in countries which do not always offer the same levels of protection for your personal data. We do our best to ensure a similar degree of security by ensuring that contracts, code of conduct or certification are in place which give your personal data the same protection it has within Europe. If we are not able to do so, we will request your explicit consent to the transfer and you can withdraw this consent at any time.

Security of your personal data

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure servers.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

We may update this privacy policy from time-to-time by sending you a new version or on our website.

Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability

7. The right to object
8. Rights in relation to automated decision making and profiling.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at info@isgroupuk.com or alexander@sioma.co.uk.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You may instruct us to provide you with any personal information we hold about you. Provision of such information may be subject to the payment of a fee (currently fixed at £15.00) by credit or debit card.

You may instruct us not to process your personal data for marketing purposes by email by sending an email to info@isgroupuk.com or alexander@sioma.co.uk at any time. In practice, you will usually either expressly agree in advance to our use of your personal data for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal data for marketing purposes.

Please note that we will still send you email reminders about changes you make to your personal or business insurance policies, when your policies are coming up for renewal, and so on.

Complaints

We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

We may change this Privacy Notice from time to time and shall notify you of any changes.

Third Party websites

The Alexander Margolin t/as Sioma Insurance Consultants and KPTI Limited website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites. Their inclusion cannot be taken to imply any endorsement or validation by us of their content.

Alexander Margolin t/as Sioma Insurance Consultants and KPTI Limited are not responsible for any privacy practices in place for third party websites, nor do we accept any liability in connection with their content.

Fraud prevention agencies

If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies.

Law enforcement agencies may access and use this information.

We and other organisations may also access and use this information to prevent fraud and money laundering, for example when:

- Checking applications for, and managing credit and other facilities and recovering debt
- Checking insurance proposals and claims

- Checking details of job applicants and employees

We, and other organisations that may access and use information recorded by fraud prevention agencies, may do so from other countries.

Updating information

We have a duty to keep your personal data up to date and accurate so from time to time we will contact you to ask you to confirm that your personal data is still accurate and up to date.

If there are any changes to your personal data (such as a change of address) please let us know as soon as possible by writing to or emailing the addresses.

Please ensure that the personal information we hold about you is correct and up-to-date.

Contact Us

If you have any questions about this privacy policy or our treatment of your personal data, please write to us or email at info@isgroupuk.com or alexander@sioma.co.uk

For specific enquiries you may contact:

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