

# RMIB PRIVACY POLICY

This Privacy Policy applies to Robertson-McIsaac Ltd (RMIB). RMIB is committed to the privacy and confidentiality of information that you provide to us. This privacy notice describes our current policies and practices with regard to personal information collected and used by us. Please take your time to read this policy carefully. When using our website, this policy should be read alongside the website terms and conditions.

## **1. About us**

Robertson-McIsaac Ltd are corporate insurance brokers and risk management consultants, owned by Lycetts Holdings Limited.

We specialise in placing corporate insurance cover for businesses. Our clients include large national institutions, nation-wide companies and professional bodies. We need to collect and process data so that we can arrange the insurance cover you have asked for, provide you with a quote, assist with any claims made under an insurance policy we have placed, provide the service you have requested, and where relevant, handle any complaints that might arise. This makes us a “data controller”. If you are unsure about who the data controller of your personal information is, you may contact the Compliance Manager at Lycetts by emailing [privacy@lycetts.co.uk](mailto:privacy@lycetts.co.uk) or by writing to the Compliance Manager at Lycetts, Milburn House, Dean Street, Newcastle upon Tyne, NE1 1PP.

## **2. About the insurance market**

Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and reinsurers. The London Insurance Market Core Uses Information Notice which can be accessed at: [http://www.lmalloyds.com/LMA/News/LMA\\_bulletins/LMA\\_Bulletin\\_2013/LMA17\\_038\\_MS.aspx](http://www.lmalloyds.com/LMA/News/LMA_bulletins/LMA_Bulletin_2013/LMA17_038_MS.aspx) sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. We recommend you review this notice.

## **3. Our processing of your personal information.**

Depending on our relationship with you, for example individuals and/or prospective customers/parties covered under an insurance policy we place, and the nature of services we

are providing you with, such as broking services, risk management or financial advice we will collect different types of personal information about you and use it for different purposes. From time to time we may ask you to provide or we may receive your “sensitive personal information” otherwise known in data protection laws as “special categories of personal information” (which is information relating to your health, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, and trade union membership). For example where we arrange travel insurance for you, we may need information about your pre-existing health conditions. In these circumstances we would use your special category data to provide a quote and arrange the placing of your insurance and to assist with any claims you make. We may also need details of any unspent criminal convictions you have for fraud prevention purposes. Where you provide personal information to us about other individuals (for example members of your household or other persons to be named on your insurance policy) we will also be data controller of and responsible for their personal information. You should refer them to this notice. We have structured this notice so that you only have to click on the section below that is relevant to you and reflects your relationship with us.

[Prospective policyholder or beneficiary under an insurance policy we may be placing](#)

[Policyholder or beneficiary under an insurance policy we have placed](#)

[Third Party claimant](#)

[Witness to an accident](#)

[Insurers, reinsurers and other business partners](#)

[Users of the RMIB website](#)

#### **4. What marketing activities do we carry out?**

We may use your personal information to provide you with information about our services which may be of interest to you where you are an existing client or where you have provided your consent for us to do so. We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you no longer wish to receive information from us and want to be removed from our standard mailing list you can “unsubscribe” by clicking the link that appears in all emails, or by contacting us using the details set out in section 10. Please note that by stopping these communications you may not hear about a new product or services such as a new mortgage or additions to our insurance that may save you money. Please note that, even if you opt out of receiving

marketing messages, we may still send you communications which are relevant to the type of services we provide you with.

## **5. Automated Decision-Making**

Lycetts do not employ automated decision-making. We may input your personal information into systems owned by Insurers which make some decisions automatically, and the decision is reached using certain processes and algorithms, rather than an Insurer employee making the decisions themselves. This is called 'automated decision-making'. We use your personal information, for example name, address, property detail, to obtain quotations and apply for cover on your behalf. You have a right not to be subject to the automated decision-making described above and you can contact us, using the details set out in section 10, to request details, in order to request that any declined decision is reconsidered by the Insurer concerned. If you want to opt out of automatic decision-making, let us know, although in some circumstances it may mean we can't place your insurance policy or offer you a quote or as some automated decisions are necessary to place your insurance policy.

## **6. How long do we keep personal information for?**

We will only keep your personal information for as long as reasonably necessary to fulfil the purposes set out in section 3 above and to comply with our legal and regulatory obligations. This will vary according to the type of policy we have arranged for you, or the service we have provided you with. After the end of the policy period or service contract we retain data only as long as is necessary in order to fulfil our legal obligations, as required by various bodies such as HMRC and our regulator (the FCA) and to be able to deal with potential future enquiries such as handling a claim or dealing with a complaint. If you would like further information about how long we will keep your personal information for, please contact us using the details set out in section 10.

## **7. What is our approach to sending your personal information overseas?**

There may be some instances where your personal information is transferred to countries outside of the United Kingdom, including to the EEA, such as when we transfer information to our other companies in the Ecclesiastical group; to third party suppliers; or when third parties who act on our behalf transfer your personal information to other countries. Where such a transfer takes place we will take the appropriate safeguarding measures to ensure that your personal information is adequately protected. We will do so in a number of ways,

including: entering into data transfer contracts with countries within the EEA and use specific contractual provisions that have been approved by European data protection authorities otherwise known as the “standard contractual clauses”, only transferring personal data to companies in non-EEA countries who have been deemed to have adequate levels of data protection for the protection of personal information. Depending on our relationship and your particular circumstances, we might transfer personal information anywhere in the world. You can find out more about this [[here](#)]. We are also entitled under data protection laws to transfer your personal information to countries outside the UK where it is necessary for the performance of the contract we have with you. A summary of our regular data transfers outside the UK is set out below:

- Servers and some data from the back office system is replicated and stored in Amsterdam.

If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please contact us using the details set out in section 10.

## **8. How do we protect your information?**

We strive to maintain the reliability, accuracy, completeness and currency of Personal Data in our databases and to protect the privacy and security of our databases. The security measures in place on our website and computer systems aim to prevent the loss, misuse or alteration of the information you provide to us. We keep your Personal Data only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal or regulatory requirements, or our data retention policy.

## **9. Your rights**

You have several data protection rights which entitle you to request information about your personal information, to dictate what we do with it or to stop us using it in certain ways. If you wish to exercise the rights set out below, please contact us at any time using the details set out in section 10. There will not normally be a charge for this. We respect your rights in relation to personal information we hold about you, however we cannot always comply with your requests, for example:

- we may not be able to delete your information if we are required by law to keep it for a longer period of time; or

- if we delete your information we would not have the necessary information we need to arrange the placing of your insurance policy, or assist you with a claim.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued. Please refer to your policy terms and conditions which will explain what will happen in the event your insurance policy is cancelled. However we will always inform you why we cannot comply with your request.

### ***The right to access your personal information***

You can request a copy of the personal information we hold about you and certain details of how we use it. Your personal information will normally be provided to you in writing unless you request otherwise or where you have made a request by electronic means such as email, we will provide such information in electronic form where possible.

### ***The right to withdraw your consent***

Where we rely on consent as the legal ground to use your personal information, you are entitled to withdraw that original consent. Please note that for certain uses of your personal information, we may need your consent in order to place your policy. If you exercise this right and withdraw your consent, we may not be able to place your insurance policy or assist you in the event you have a claim. We will inform you of these consequences when you withdraw your consent.

### ***The right to rectification***

We make reasonable efforts to keep your personal information where necessary up to date, complete and accurate. We encourage you to ensure that your personal information is accurate so please regularly let us know if you believe that the information we hold about you may be inaccurate or not complete. We will correct and amend any such personal information and notify any third party recipients of necessary changes.

### ***The right to restriction of processing***

Subject to the circumstances in which you exercise this right, you can request that we stop using your personal information, such as where you believe that we no longer need to use your personal information.

### ***The right to data portability***

Subject to the circumstances in which you exercise this right, you can request that we port across personal information you have provided to us to a third party in a commonly used and machine-readable format.

### ***The right to erasure***

You can request that we delete your personal information. For example, where we no longer need your personal information for the original purpose we collected it for or where you have exercised your right to withdraw consent. Whilst we will assess every request, this request is subject to legal and regulatory requirements that we are required to comply with.

### ***The right to object to direct marketing***

You can request that we stop sending you marketing messages at any time by clicking on the “unsubscribe” button in any emails that we send to you or by contacting us using the details set out in section 10. Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.

### ***Rights relating to automated decision-making***

If you have been subject to an automated decision and do not agree with the outcome, you can contact us using the details set out in section 10 and ask us to review the decision.

### ***The right to make a complaint with the ICO***

Where you believe that we have breached data protection laws when using your personal information, you can complain to the Information Commissioner’s Office (ICO). For more information visit the ICO’s website at <https://ico.org.uk/>. Please note that exercising this right and lodging a complaint will not affect any other legal rights or remedies that you have.

## **10. Contacting us**

If you would like further information about the ways we use your personal information, further clarity on how we use your personal information or anything referred to in this notice, please contact our Compliance Manager at [privacy@lycetts.co.uk](mailto:privacy@lycetts.co.uk) or by writing to Compliance Manager at Lycetts, Milburn House, Dean Street, Newcastle upon Tyne, NE1 1PP.

## **11. Updates to this notice**

We are continually improving our methods of communication and alongside with changes in the law and the changing nature of technology, our data practices and how we use your data will change from time to time. If and when our data practices change, we will notify you and we will provide you with the most up-to-date notice. You can view it by checking our website <http://www.lycetts.co.uk/>. This notice was last updated on 25<sup>th</sup> October 2021.