



TRAFALGAR RISK MANAGEMENT

## PRIVACY NOTICE

### Introduction

We are committed to protecting the confidentiality and security of the information that you provide to us, In accordance with:

- The UK's updated Data Protection Act 2018 ('DPA'), which was initially the UK's enactment of the EU GDPR;
- The UK retained provisions of the EU's General Data Protection Regulation ('UK GDPR') (retained by virtue of the [European Union \(Withdrawal\) Act 2018](#));
- Regulations based on wider EU legislation such as the [Privacy and Electronic Communications Regulations \(EC Directive\) 2003](#) ('PECR') and future updates; and
- Wider guidance from the Information Commissioners Office – [www.ico.org.uk](http://www.ico.org.uk)

This Privacy Notice is designed to help you understand how we collect and use your information.

If you have any questions or queries about this policy, please contact us.

### Who we are

"TRM" (also referred to in this Notice as "we", "us", or "our") means Trafalgar Risk Management Limited.

### How to contact us:

For any questions or concerns relating to this Privacy Policy or our data protection practices, or to make a subject access or any other request regarding the information we hold, please contact us at:

Trafalgar Risk Management Limited, 51 Eastcheap, London EC3M 1JP

email: [info@trafalgarinsurance.co.uk](mailto:info@trafalgarinsurance.co.uk)

Tel: 0333 8 000 000

Website: [www.trafalgarinsurance.co.uk](http://www.trafalgarinsurance.co.uk)

In person: By visiting our office at 51 Eastcheap, London EC3M 1

### Why we need and how we use your personal information

We only collect, use, and store your information where we have lawful grounds and legitimate business reasons to do so.

We collect, use, and store your personal information in order to fulfil requests for quotes, products, and services as part of our insurance broking, claims handling and risk management business. It may also be used to verify your identity, to administer payments and to enable us to carry out anti-money laundering and other financial crime checks where required. If you pay by instalments your information may also be used to arrange credit.

The use of your data is essential for us to check your identity, to enable you to enter into an insurance contract and for the insurance to operate (in the event of a claim, for example). We may also use it to keep our records up to date, to notify you about changes to our service and to help us in developing new products and services.

If you do not provide the information required, we are unlikely to be able to arrange your insurance and may not be able to provide certain services to you.

We may monitor calls, emails, text messages and other communications with you. When you contact us, we may keep a record of that correspondence and any information provided to us during that or any subsequent communication.

## **Marketing**

We would like to keep you updated about our relevant products and services by email, SMS and/or telephone. If we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes, we will only do so with your consent. Your consent will be obtained specifically at the appropriate time.

If you have already consented and wish us to stop using your information for this purpose or any other purpose, then please contact us.

## **The Legitimate Interests Of The Controller Or Third Party, Where Applicable**

In purchasing our products and services you should understand that you are forming a contract with us. If you contact us for a quote or request details on the services we provide, we consider ourselves as having a legitimate business interest to provide you with further information about our services.

## **Nature of personal information**

Personal data is any information that may identify a living individual.

We collect personal information such as name, contact details, date of birth, gender, marital status, financial details, employment details and other personal details depending on the nature of the insurance and other services we offer.

Personal data may contain information which is known as special categories of personal data. This may be information relating to an individual's health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to or sexual orientation, and may also contain data relating to criminal convictions and offences, all of which we will collect, use and store as necessary in relation to arranging insurances.

For the purposes of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data, where we are legally required to comply with specific data processing requirements.

This information may be shared with insurers, insurance product providers and our third-party service providers. Where necessary, we shall obtain your consent to the processing of such information.

### **Sharing information**

We will only supply your personal information to other parties where such a transfer is a necessary part of the activities that we undertake, where you give us consent or where we are required to do so by law or regulation (e.g., where the disclosure is necessary for the purposes of the prevention and/or detection of crime).

As an intermediary we must disclose personal information to insurance companies, underwriting agencies, business partners and other parties in order to provide our products and services and to enable you to enter into insurance contracts. Examples of other parties include other insurance intermediaries, loss adjusters, regulatory bodies, legal and accountancy firms involved in the claims handling process. We may also share your personal information with fraud prevention agencies such as the Claims and Underwriting Exchange Register and Motor Insurance Anti-Fraud and Theft Register. We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents, and suppliers.

We only share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do. We may also disclose personal information to new owners of our business in the event that we are subject to a merger or acquisition. Disclosure may also be made to enable company audits, regulatory inspections or to investigate a complaint, suspicion of fraud or a security threat.

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

You understand that we may disclose the information you provide to relevant other parties for the purposes described in this Notice.

## Transfer of personal data outside the UK

Certain personal information held on our Information Technology systems may be transferred across geographical borders in accordance with applicable law.

By providing us with your information, you consent to the collection, international transfer, storage, and processing of your information. These transfers are governed by European Union (EU) standard contractual clauses or equivalent data transfer agreements to protect the security and confidentiality of personal information.

## How long we keep information about you

We will keep your information for as long as it is required to enable us to provide quotations, administer your insurances, offer renewal, and respond to any claims or complaints (which may arise after the period of insurance has expired). This will usually be a minimum period of seven years or otherwise as determined by law or regulation. Once we decide that we no longer need your information it will be securely and confidentially destroyed.

## Your data protection rights

You have certain legal rights under UK data protection law and regulations, summarised as follows:

- **The right to be informed** about our data processing activities, including through Privacy Notices such as this.
- **The right of access** to the personal information we hold about you. To request a copy of this information you must make a subject access request in writing to us.
- **The right of rectification**. You may ask us to correct any inaccurate or incomplete data within one month.
- **The right to erasure and to restrict processing**. You have the right to have your personal data erased and to prevent processing except where we have a legal obligation to process your personal information. You should bear in mind that by exercising this right you may hinder or prevent our ability to provide products and services.
- **The right to data portability**. On your request, we will provide you with your personal data in a structured format.
- **The right to object**. You have particular rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for profiling, direct marketing, or research purposes.

If you want to invoke any of these rights, please write to us:

Trafalgar Risk Management Limited, 51 Eastcheap, London EC3M 1JP or email: [info@trafalgarinsurance.co.uk](mailto:info@trafalgarinsurance.co.uk) or call us on 0333 8 000 000.

## **Information from other sources**

We may use legal public sources such as the electoral roll and other third-party sources such as credit reference agencies to obtain information about you, for example to verify your identity or check your credit history.

We also obtain information about you from credit reference agencies and similar third parties. Some personal information may be provided to us by third parties such as insurance companies, other insurance intermediaries and motor vehicle licensing authorities. In some cases, you will have previously submitted your personal information to them and given them approval to pass this information on for certain purposes.

Such information will only be obtained from reputable sources which operate in accordance with the General Data Protection Regulation.

We and other parties may use your information for purposes such as statistical and trend research and analysis which may include computerised processes which profile you. Automatic profiling helps us understand, predict, and forecast customer preferences and to improve the products and services we offer and to assess which products might be most suitable for you.

## **Withdrawal of consent**

Where you have provided your specific consent to the use of personal data, you may withdraw that consent by contacting us:

Trafalgar Risk Management Limited, 51 Eastcheap, London EC3M 1JP

email: [info@trafalgarinsurance.co.uk](mailto:info@trafalgarinsurance.co.uk)

Tel: 0333 8 000 000

In person: By visiting our office at 51 Eastcheap, London EC3M 1JP

## **How to make a complaint**

If you wish to make a complaint about how we hold or use your data, please contact us:

Trafalgar Risk Management Limited, 51 Eastcheap, London EC3M 1JP

email: [info@trafalgarinsurance.co.uk](mailto:info@trafalgarinsurance.co.uk)

Tel: 0333 8 000 000

In person: By visiting our office at 51 Eastcheap, London EC3M 1JP

If you are dissatisfied with how we deal with your complaint, you may contact the Information Commissioner's Office:

The Information Commissioner Wycliffe House Water Lane Wilmslow Cheshire, SK9 5AF;

Phone: 08456 30 60 60 Website: [www.ico.gov.uk](http://www.ico.gov.uk)

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal requirements. The latest version of this policy can be found at [www.trafagarinsurance.co.uk](http://www.trafagarinsurance.co.uk)