

Privacy Notice

M J Touzel (Insurance Brokers) Limited and The Islands Insurance Brokers Limited, together known as "Islands", "we" or "us" and Hepburns Insurance Limited Jersey known as "Hepburns" and Hepburns Insurance Limited Guernsey known as "Hepburns", "we" or "us" are committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the Data Protection (Jersey) Law 2018 (DPJL) and the Data Protection (Bailiwick of Guernsey) Law 2017 (DPGL).

Islands and Hepburns are "Data Controllers". This means that we are responsible for deciding how we hold and use personal information.

We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

M J Touzel (Insurance Brokers) Limited trading as Islands Insurance is registered with the Jersey Financial Service Commission ("JFSC") with registration number **2589** and Hepburns Insurance Limited, also registered with the JFSC, registration number **4722**.

The Islands Insurance Brokers Limited trading as Islands Insurance is registered with the Guernsey Financial Services Commission ("GFSC") with registration number **13696** and Hepburns Insurance Limited also registered with the ("GFSC"), registration number **15258**.

Islands are also registered with the Jersey Office of the Information Commissioner ("JOIC") as a Data Controller, registration number **58124** and the Office of the Data Protection Authority, Guernsey ("ODPA") as a data controller, registration number **DPA1697**. Hepburns are registered with the JOIC, registration number **16297** and the ODPA, registration number **DPA1704**.

We will comply with data protection law. This says that the personal information we hold about you must be: -

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

We will also only transfer your information when it is safe to do so, when it is necessary to do so and your information is protected in the same way that we protect it.

Islands / Hepburns are accountable to you and the Authorities to not only show compliance with the data

The Data Protection Officer ("DPO")

We have appointed a DPO to oversee compliance with this Privacy Notice.

If you have any questions about this Privacy Notice or, how we handle your personal information, please contact the DPO at dataprotection@islands.je.

You have the right to make a complaint at any time to the Jersey Office of the Information Commissioner (JOIC), the supervisory authority in Jersey for data protection issues or the Office of the Data Protection Authority (ODPA) in Guernsey.

Contact details for these is outlined at the bottom of this Privacy Notice.

The Kind of Information We Hold About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

To explain this to you, we will, when necessary, list our different services when we collect or use different information about you.

How Is Your Personal Information Collected?

We collect personal information about our you when you contact us, take out one of our motor, commercial or personal insurance policies or provide use with your information for another specific purpose.

What information do we collect about you?

- Name
- Title
- Address
- Date of Birth
- Identification documents
- Telephone number
- Occupation
- Email address
- Signature
- Bank details

Where necessary, we may also collect the following information:

- Country of Birth
- Nationality
- Country of Residence
- Gender
- Marital Status
- Financial Status (CCJ's Bankruptcy)
- Criminal Convictions
- Health Information
- Claims History
- Vehicle Ownership
- Asset Ownership
- Employment Status

Finally, depending on the type of policy, we may also require the following Information:

Motor Insurance

A Motor policy requires us to collect the personal information listed and further information about you and anyone to be covered by the policy or authorised to act on your behalf.

This includes the type of license you hold and for how long you have held it, any penalty points or motoring offences, any medical conditions which must be declared to the relevant Driver and Vehicle Licensing Authority. We need this information to effectively price your premiums.

Personal Insurance

A Personal policy requires us to collect the personal information listed and additional information about you and any other people to be covered by the policy, such as information about your lifestyles and employment status, your home and any assets to be insured.

Commercial Insurance

A Commercial policy requires us to collect some of the personal information listed and additional information about the Company's directors and employees, as well as business contact details.

If your business is under your name and located at your home address, by default the information we collect will be personal to you. will be personal to you.

What Special Category Data we collect about you?

On occasions when we collect what is called Special Category data, we will always have either a clear legal basis to process this or your explicit consent. If we rely on your explicit consent, you can withdraw this at any time by contacting our DPO at dataprotection@islands.je

Special Category data is any information relating to your health, gender, race, sexual orientation, sex life, genetic or biometric data etc.

An example of this processing would be, when applying for Motor insurance we require you to declare any previous convictions or health data when assessing your suitability. This information is then stored very safely on our computer system. We have a legal obligation to collect this information and to store it.

How We Will Use Information About You?

We will only use your personal information when the law allows us to, this is called a legal basis (highlighted in bold) for processing your information (data).

Most commonly, we will use your personal information in the following circumstances:

1. Where you have entered into a **contract** with us to provide you with a service. This would be when you take out motor or personal insurance with us.

2. Where we need to comply with a **legal obligation**. This would be when we have to comply with a lawful authority to disclose information to the Police.
3. Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests. An example of this is when we are acting as an insurance intermediary in arranging insurance contracts and fulfilment of those contracts including claims servicing and settlement.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where you have given your **consent** to contact you for a specific purpose.
2. In an emergency and it is in your **vital interest** that we share your information, when we have it recorded.

Marketing

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant to you.

You will receive marketing communications from us in respect of our business and our services if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

We don't share your contact details with any third party for the purpose of that third party sending out marketing.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing messages sent to you or by contacting us using the details above at any time.

If you opt out of receiving marketing messages, this will not affect the personal data we collect as a result of a service purchase, service experience or other transactions.

We may use third party service providers to send our marketing communications (such as email platforms), but they are not permitted to use your data for their own purposes.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Data Sharing

We may on occasions pass your Personal Information to organisation outside of Islands Insurance exclusively to process on our behalf, these organisations are called Data Processors.

We require these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice.

We do not pass on information gained from your engagement with us without a clear legal basis for doing so. However, we may disclose your Personal Information to meet legal obligations, regulations, or valid governmental request such as a Police request for CCTV.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

It may also be processed by companies operating outside the EEA who work for us or for one of our service providers.

If we do this, we ensure that your privacy rights are respected in line with this Policy and the same protection is given to your personal information as laid down by the DPJL and DPGL.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, altered or disclosed, or accessed in an unauthorised way. In addition, we limit access to your personal information to those Colleagues, Agents, Contractors and other third parties on a need to know basis.

They will only process your personal information on our strict instructions and they are subject to a duty of confidentiality.

Details of these measures may be obtained from our Data Protection Officer (DPO).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You can request our Data Retention Schedule from our DPO if required.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of Access, Correction, Erasure, and Restriction

It is important that the personal information we hold about you is accurate and current.

Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing or request that we transfer a copy of your personal information to another party, please contact our DPO at dataprotection@islands.je

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

How to request your information and what we may need from you

Please use the Data Subject Access request form, available on our Cookie Banner. If you have any questions about this process or any of your rights, please contact our DPO at dataprotection@islands.je

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We will respond to your request within **4 weeks** after and upon satisfactory verification of your identity.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact our DPO at dataprotection@islands.je.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information or requesting you to confirm the accuracy of the information we hold on you.

Complaints

We would like the chance to resolve any complaints you have about the way we process your information; however, you do have the right to complain to the Jersey Office of the Information Commissioner or the Office of the Data Protection Authority in Guernsey about how we have used your personal data.

The details for each of these contacts are:

Islands Insurance - Jersey

Kingsgate House, 55 The Esplanade, St Helier,
Jersey, JE1 4HQ
Telephone **+44 (0) 1534 835383**
or Email dataprotection@islands.je

Hepburns Insurance - Jersey

Kingsgate House, 55 The Esplanade, St Helier,
Jersey, JE1 4HQ
Telephone **+44 (0) 1534 515151**
or Email dataprotection@islands.je

Islands Insurance - Guernsey

PO Box 449, Plaza House, Elizabeth Avenue,
St Peter Port, Guernsey GY1 3ZZ
Telephone **+44 (0) 1481 710731**
or Email dataprotection@islands.je

Hepburns Insurance - Guernsey

PO Box 449, Plaza House, Elizabeth Avenue,
St Peter Port, Guernsey GY1 3ZZ
Telephone **+44 (0) 1481 738080**
or Email dataprotection@islands.je

Islands Insurance - Alderney

17 Victoria Street, Alderney, GY9 3TA
Telephone **+44 (0) 1481 824100**
or Email dataprotection@islands.je

Office of the Information Commissioner - Jersey

2nd Floor, 5 Castle St, St Helier, Jersey JE2 3BT
Telephone **+44 (0) 1534 716530**
or Email: enquiries@jerseyoic.org

Office of the Data Protection Authority - Guernsey

Block A, Lefebvre Street, St Peter Port, Guernsey,
GY1 2JP
Telephone **+44 (0) 1481 742074**
or Email: info@odpa.gg