



# Privacy Policy

Version 3 Revised November 2020

Welcome to FirstPort Insurance Service Limited's (FISL) privacy notice.

FISL respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how FISL collects and processes your personal data, including any data you may provide through our website, purchase an insurance policy, take part in a competition or provide feedback.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. Other privacy notices may supplement this notice and are not intended to override this notice.

### CONTROLLER

This privacy notice is issued on behalf of the FirstPort Insurance Services Limited so when we mention "FISL", "we", "us" or "our" in this privacy notice, we are referring to. FirstPort Insurance Services Limited is the controller and responsible for their website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

### CONTACT DETAILS

Our full details are:

Postal Address	FirstPort Insurance Services Limited, Queensway House, 11 Queensway, New Milton, Hampshire, BH25 5NR
Telephone number	0333 005 0132 (local rate)
Email	DPO@firstport.co.uk
Website	www.firstportinsurance.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. For example if you change your email address, name or payment details, or if you wish to cancel your policy, please let us know the correct details by sending a letter or email to FISL at the above registered address. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

#### THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- a) **Identity Data** includes full name, address, title, marital status, gender, photographic identification and date of birth.
- b) **Contact Data** includes property/correspondence address, email address and telephone numbers.
- c) **Financial Data** includes bank account details, insurance history if relevant, financial history if relevant.
- d) **Transaction Data** includes details about payments to and from you and the reasons for.
- e) **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- f) **Profile Data** includes your policy information, feedback and survey responses.
- g) **Usage Data** includes information about how you use our website.
- h) **Marketing and Communications Data** includes your preferences in receiving marketing from us (if asked) and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect **Special Categories of Personal Data** about you (for example this includes details about your race, religion and health). These will only be disclosed when deemed necessary for a specific intended purpose.

#### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract and you fail to provide that data when requested, we may not be able to perform the contract we have (for example, to provide you with an insurance policy). In this case, we may have to cancel a policy you have with us but we will notify you if this is the case at the time.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Profile and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you :
  - apply for insurance;
  - request information to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see 'cookies' for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third as set out below:
  - Personal data from loss adjusters or appointed contractors
  - Personal data from the FirstPort Limited or its subsidiary companies
  - Technical Data from the following parties:
    - (a) analytics providers
      - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Encoded.
      - Identity and Contact Data from data brokers or aggregators.
      - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you. We currently do not intend to market to you; however, we may wish to in the future, therefore we may request your consent when you take out a policy with us. If at any time we do ask for your consent and it is given you will have the right to withdraw your consent to marketing by contacting us.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that 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 contact us 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 including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (f) Profile	Performance of a contract
To provide services to you	(a) Identity (b) Contact (f) Profile	Performance of a contract
To manage payments for services	(a) Identity (b) Contact (c) Financial	Performance of a contract <ul style="list-style-type: none"> <li>▪ Necessary to comply with a legal obligation</li> </ul>
To manage claims	(a) Identity (b) Contact (c) Financial (f) Profile	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Necessary to comply with a legal obligation</li> </ul>
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to provide feedback or take a survey	(a) Identity (b) Contact (f) Profile  (h) Marketing and Communications	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Necessary to comply with a legal obligation</li> <li>▪ Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>

To enable you to partake in a prize draw or competition	(a) Identity (b) Contact (f) Profile (g) Usage (l) Marketing and Communications	<ul style="list-style-type: none"> <li>▪ Performance of a contract with you</li> <li>▪ Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (e) Technical	<ul style="list-style-type: none"> <li>▪ 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)</li> <li>▪ Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (e) Technical (f) Profile (g) Usage (h) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(e) Technical (g) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (e) Technical (f) Profile (g) Usage	Necessary for our legitimate interests (to develop our products/services and grow our business)

## MARKETING

We provide you with choices regarding certain personal data uses, particularly around marketing and advertising. FISL will not share your data for marketing or advertising purposes and would always request consent to do so.

You may receive marketing communications from us if you have consented for us to market to you. You can opt out of receiving marketing communications at any time by contacting us.

## COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service.

For further information about cookies visit [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, if you select this setting you may be unable to access certain parts of our site.

<http://www.allaboutcookies.org/>  
link to company cookie policy

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties.
- External Third Parties.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with applicable laws. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

Although unlikely, some of our external third parties may be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see *European Commission: Standard Contractual Clauses for the transfer of personal data to third countries*.
- Where we use providers based in the US, we only transfer data to them if they are part of a Standard Contractual Clause and NOT US Privacy Shield.

Commented [KB1]: Privacy Shield is no longer valid

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. DATA SECURITY**

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 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.

## **8. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data 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.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **NO FEE USUALLY REQUIRED**

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.

### **WHAT WE MAY NEED FROM YOU**

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.

#### TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within 28 days. Occasionally it may take us longer than the 28 day period 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.

## 10. GLOSSARY

#### LAWFUL BASIS

**Legitimate interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### THIRD PARTIES

##### Internal third parties

FISL sits within the Knight Square Group, other companies in the group acting as joint controllers or processors and provide IT and system administration services and undertake leadership reporting.

##### External third parties

Service providers acting as processors eg loss adjusters, contractors, banking, HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances. Or joint data controllers such as insurers.

#### YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.



**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## 11. CONTACT US

FirstPort Insurance Services  
11 Queensway  
New Milton  
Hampshire  
BH25 5NR  
Phone: 0333 005 0132 (local rate)  
Email: [insurance@FirstPort.co.uk](mailto:insurance@FirstPort.co.uk)  
Opening Hours: Open Mon-Fri 9am to 5pm