

## **PRIVACY POLICY**

Alsford Page & Gems Limited (“APG”) are committed to protecting and respecting your privacy. This policy sets out how we may use any personal data we collect from you or that you provide to us. This policy is written in accordance with the European Union’s General Data Protection Regulation (GDPR).

### **Data Controller**

Alsford Page & Gems Limited

020 7456 0500

dean.cain@apg.net

Minories House, 2-5 Minories, London, EC3N 1BJ

### **Data Protection Contact**

Dean Cain

020 7456 0500

dean.cain@apg.net

Minories House, 2-5 Minories, London, EC3N 1BJ

## **1. WHAT INFORMATION DO WE COLLECT?**

Your personal data is required by APG for communication and setting up a contractual agreement to provide products and services. Without this personal data, APG will not be able to communicate with you or enter into a contractual agreement with you. This applies to both business and employment contracts.

APG collect personal information such as your name, address, email address and date of birth, as well as other information that relates to the risk to be insured. Bank account and payment details may also be collected to allow us to perform under the terms of our contract with you. APG may also collect additional information obtained following a credit assessment or in order for a claim incident to be progressed.

### **1.1. How is it collected?**

- We collect identifying information via email from you or your intermediary, or via forms sent to you or your intermediary to complete.
- Credit searches carried out based on the initial personal data provided will allow us to collect additional information used in order for us to enter into or perform as part of our contract with you.

## 2. HOW WILL WE USE AND SHARE YOUR INFORMATION?

APG will share your information with our service providers and trading partners to assist in the administration and performance of our service to you and your insurance policy.

In order for APG to conduct business and fulfil our legal, regulatory and contractual obligations, we need to perform legitimate processing of your data. Information collected by APG may be shared as part of our process, with individuals as well as other organisations. Below are some descriptions of the types of organisations APG may need to share personal data with.

- Insurers/Reinsurers
- Third Party Agents
- Central Government
- Regulatory authorities and Ombudsmen that we are governed by
- Credit reference agencies
- Financial organisations
- Health & welfare organisations
- Employments Agencies
- Insurance Databases
- Other companies within the same group
- Payroll Agent
- Pension provider

Any payment details provided by you will be used by APG to renew your policy or process refunds or any other charges.

In the case of current and former employees of APG, information we collect will be used to complete our obligations to you under the terms of our contract. We may also have to share this personal information as part of a reference with any of the types of organisations listed above.

Where permitted, we will keep you up to date about our products and services that may interest you. If you have indicated that you prefer not to be informed, we will make sure that you are not contacted in this way. You can update your preference at any time by contacting us with the details provided.

## 3. HOW WILL WE STORE YOUR PERSONAL DATA?

Your personal data collected by APG may be stored and processed in the United Kingdom or any other country in which APG or associated third parties maintain facilities. Where APG need to transfer your personal data, we have put in place reasonable procedures and securities to make sure that this complies with GDPR.

### 3.1. Keeping your personal data

APG may be required to keep specific records to fulfil statutory or regulatory requirements; to meet our operational needs; to meet any historical purposes.

Personal data that is collected and subsequently never used for any business purpose will be reviewed and may be destroyed at APG's discretion.

#### **4. YOUR RIGHTS**

Your rights regarding the personal data we store on your behalf include:

- Access to a copy of your personal data that we hold
- Requesting that we not send you direct marketing material
- Requesting that inaccurate personal data be corrected, blocked, or deleted

You can exercise your rights at any time by contacting APG using the information within this policy.

##### **4.1. Withdrawing**

You have the right to ask us to withdraw your consent to our processing and holding of any sensitive data such as criminal convictions and health data. However, if you do so, this will be treated as a request to cancel your policy, as this is necessary for us to effectively manage your policy.

##### **4.2. Complaining**

In addition to your rights under our Terms of Business Agreement, you also have the right to raise a privacy complaint with the [Information Commissioner's Office](#) (ICO).