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Policy

WHAT IS THE GENERAL DATA PROTECTION REGULATION?

The General Data Protection Regulation (GDPR) is European legislation that was designed to achieve the following:

- Shape how organisations across the European Union (EU) approach data privacy.
- Enhance existing data privacy rights for EU citizens.
- Establish new data privacy rights for EU citizens.

You have more control of your data under GDPR and we have to be more transparent in our dealings with you and more accountable in terms of how we manage your data.

ABOUT US

i4me ('we', 'us', 'our') is an insurance intermediary and an Appointed Representative of Smith & Pinching Financial Services Limited.

THE PURPOSE OF THIS POLICY

In collecting and using your data as described herein, we are acting as a 'data controller' of your personal information.

When we provide our services to you, we will collect personal information about you (and others). We want to be open and transparent with you as to the types of information we collect, why we collect it, how we use it and with whom we may share it and your rights.

If you have any questions or concerns about our use of your personal information, please contact us via the details provided in the "How To Contact Us" section of this Privacy Policy.

This policy (together with our website terms of use and cookie policy) explains how we use any personal data we collect from you through our websites or otherwise.

WHAT ARE MY DATA PROTECTION RIGHTS?

You have the right to make certain requests in relation to the personal information that we hold about you. We will not usually charge for dealing with these requests. Please contact us if you wish to exercise your rights at any time.

We may not always be able to comply with your request (such as where this would conflict with our obligation to comply with other regulatory and/or legal requirements). However, we will always respond to you and we will tell you why we cannot comply with your request, if that is the case.

There may also be circumstances where exercising some of these rights (such as the right to erasure, the right to restriction of processing and the right to withdraw consent) will mean your insurance can no longer be provided and it may therefore result in the cancellation of your policy. You will therefore lose the right to bring any claim or receive any benefit, including in relation to any event that occurred before you exercised your right. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

- **The right to access your personal information:** You are entitled to a copy of the personal information we hold about you and certain details of how we use it. We will usually provide you with your information in writing, unless you request otherwise, or where you have made the request using electronic means, in which case the information will, where possible, be provided to you by electronic means.
- **The right to rectification:** We take reasonable steps to ensure that information we hold about you is accurate and complete. However, you can ask us to amend or update it if you do not believe this is the case.
- **The right to erasure:** You have the right to ask us to erase your personal information in certain circumstances, for example where you withdraw your consent or where the personal information we collected is no longer necessary for the original purpose. This will need to be balanced against other factors however. For example, we may have regulatory and/or legal obligations which mean we cannot comply with your request.
- **The right to restriction of processing:** In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that we no longer need to use your personal information or where you think that the personal information we hold about you may be inaccurate.
- **The right to data portability:** You have the right, under certain circumstances, to ask that we transfer personal information that you have provided to us to another third party of your choice.
- **The right to object to marketing:** You can ask us to stop sending you marketing messages at any time by contacting us. If you opt out of receiving marketing messages, we may still send you (non-marketing) service-related communications where necessary.
- **Rights relating to automated decision-making:** You can contact us and ask us to review the decision if you have been subject to an automated decision and do not agree with the outcome.
- **The right to withdraw consent:** We will ask for your consent for certain uses of your personal information. Where we do this, you have the right to withdraw your consent to further use of your personal information.

- **The right to lodge a complaint with the Information Commissioner's Office:** You have a right to complain to the ICO if you believe that any use of your personal information by us is in breach of applicable data protection laws and/or regulations. More information can be found on the ICO website: <https://ico.org.uk/> This will not affect any other legal rights or remedies that you have.

DO I NEED TO DO ANYTHING?

No. We have always taken our data protection responsibilities very seriously and have always collected and processed your data for the same purposes. Primarily, this means obtaining data from you and sharing it with certain trusted third parties in order to provide our products and services to you.

WHAT INFORMATION WE COLLECT AND HOW WE COLLECT IT

The personal information that we collect will depend on our relationship with you. For example, we will collect more detailed information about you if you are a customer than we would if you simply made an enquiry about the products and services we offer.

Depending on the types of products and services you require, we may also need to collect information from and about you which the law considers to be sensitive, which we refer to as **special category personal data**. This may relate to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership) because it is relevant to your insurance policy or claim (for example information regarding criminal convictions for the purposes of preventing, detecting and investigating fraud).

To enable us to provide you with the right product or service, we will collect personal information about you which may include the following

- Basic personal details such as your name, address, email address, telephone number, date of birth or age, gender, marital status
- Information about your income and employment, including job title and business description
- Information about your mortgage provider
- Information about your insurance requirements, such as sums insured, details of your home and other information relevant for rating
- Information about your other policies, such as claims history, quotes history, additional policies held, payment history and claims data
- Sensitive information. We only collect and process sensitive personal data where it is critical for the delivery of a product or service and without which the product or service cannot be provided. **We will therefore not seek your explicit consent to process this information as it is required by us to provide the product or service you have requested and is legitimised by its criticality to the service provision. If you object to use of this information then we will be unable to offer you that product or service**
- Your payment details
- Information captured during recordings of our telephone calls • Your marketing preferences

We will obtain your personal information directly from you or someone else acting on your behalf in a number of ways, including:

- Via your use of our websites
- Requesting or obtaining a quotation
- Via the telephone, email, post or social media
- Face to face
- Entering competitions

HOW WE WILL USE YOUR INFORMATION

We may use your information to:

- Administer quotations and policies
- Make a decision whether we choose to accept or decline the proposed risk
- Calculate your premium and terms
- Provide you with payment options
- Maintain our records
- Confirm your identity and to prevent fraud
- Investigate and resolve any complaints
- Deal with any claims you should submit under your policy
- Verify the information you provide
- Undertake internal quality monitoring and external audits
- Carry out market research, statistical analysis and customer profiling

We may process your information for a number of different purposes, each of which requires a legal basis. We will rely on the following legal bases:

- We need to use your personal information to enter into or fulfil our contractual obligations to you. For example, in order to place appropriate insurance cover, we need to use your personal information to provide you with a quote and determine market placement.
- We have a genuine business need to use your personal information for reasons such as maintaining our business records, keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these reasons, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the information that we process is classed as a **special category information**, we must have one of the following additional legal grounds for processing:

- It is necessary for an insurance purpose and it is in the substantial public interest. This will apply where we are advising or arranging an insurance policy, assisting with any claims under a policy, and undertaking any activities to prevent and detect fraud.
- Where the use of your special categories of information is necessary to establish, exercise or defend our legal rights, for example legal proceedings are being brought against us or we want to bring a legal claim ourselves.

WHO WE WILL SHARE YOUR PERSONAL INFORMATION WITH

- Smith & Pinching, with whom we share certain resources, such as accounting, compliance and insurance
- Our insurance partners, such as other insurance intermediaries, managing general agents, insurers, reinsurers or other companies who act as insurance distributors
- Other brokers who act directly for you and with whom we have agreements to facilitate the placement of an insurance policy for you, if this is something that we think is in your best interests
- Other insurers and insurance intermediaries who provide our own insurance
- Other third parties who assist in the administration of insurance policies, such as loss adjusters, claims handlers, accountants, auditors, lawyers, our insurers and other experts
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- Our regulators
- Industry bodies such as the Financial Ombudsman Service
- Debt collection agencies
- Credit reference agencies
- Our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers, review collectors and insurance software providers
- Selected third parties in connection with the sale, transfer or disposal of our business
- With your consent, to any other person, firm, body etc not described above
- To any other person, firm, body etc not described above, where we are permitted or obliged to do so by law
- You may not have direct contact with all the parties listed above

Reason for using your personal information	Legal grounds for using your personal information	Legal grounds for using your special category personal information
To evaluate your insurance needs and risk appetite and obtain quotes for you, including providing new quotations in subsequent years	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to determine market placement and place insurance cover for you that is in line with your insurance needs) 	<ul style="list-style-type: none"> • It is necessary for an insurance purpose
To set you up as a customer, including carrying out fraud, credit and anti-money laundering checks	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to carry out appropriate credit checks and fraud checks) • We have a legal or regulatory obligation (to carry out appropriate credit checks and fraud checks) 	<ul style="list-style-type: none"> • The prevention and detection of fraud is in the substantial public interest • It is necessary for an insurance purpose • It is necessary to establish, exercise or defend our legal rights
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to respond to our customers or prospective customers and keep them updated on any future placing of insurance cover) 	<ul style="list-style-type: none"> • It is necessary for an insurance purpose • It is necessary to establish, exercise or defend our legal rights
Complying with our legal or regulatory obligations (such as our requirements to report to the FCA)	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend our legal rights • It is necessary for an insurance purpose
Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services organisations	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to ensure that we take all necessary precautions to prevent fraud) • We have a legal or regulatory obligation (to carry out appropriate credit checks and fraud checks) 	<ul style="list-style-type: none"> • The prevention and detection of fraud is in the substantial public interest • It is necessary for an insurance purpose. • It is necessary to establish, exercise or defend our legal rights
Providing improved quality, training and security (e.g. with respect to recorded or monitored phone calls to our contact numbers)	<ul style="list-style-type: none"> • We have a genuine business need (to continually improve our services) 	<ul style="list-style-type: none"> • It is necessary for an insurance purpose
Managing our business operations, such as maintaining accounting records, analysing financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> • We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business) 	

Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services we offer This includes providing new quotations in subsequent years and in the first year after you make a quote enquiry, but you do not proceed.	<ul style="list-style-type: none"> We have a genuine business need (to market our services) 	
Tracing and recovering debt	<ul style="list-style-type: none"> We have a genuine business need (to trace and receive any debt which is owed to us) 	<ul style="list-style-type: none"> It is necessary to establish, exercise or defend our legal rights
Monitoring usage of any of the various i4me websites	<ul style="list-style-type: none"> We have a genuine business need (to assess usage of our website), in order to help manage our business and to improve our products and services to all customers and website users 	
To apply for and claim on our own insurance	<ul style="list-style-type: none"> We have a genuine business need (to have our own insurance) 	<ul style="list-style-type: none"> We have your explicit consent It is necessary to establish, exercise or defend our legal rights

DISCLOSING OTHER PEOPLE'S INFORMATION

We may collect personal information from you about other individuals for example joint policy holders or someone you authorise to deal with us. If you provide information about another person you are responsible in ensuring that you have told the individual how we will use their personal information. You will also have permission from the individual to provide their personal information (including any sensitive information) to us to process.

ONLINE CHANNELS

We may use and share information from or with online sources, such as websites, social media. This information may be used to help tailor and improve our services and communicate with you effectively, as we know many of our customers use a range of media channels.

Where we use or share information from or with these sources, we will respect any permissions you have advised about how you would like your information to be used. We recommend you routinely review the privacy notices and preference settings that are available to you on any social media platforms.

INTERNATIONAL DATA TRANSFERS

We do not transfer any data outside of the UK. Our back-office client management system stores client information and documentation on servers, which are located in the UK. Email records are backed up to cloud storage via Microsoft. The servers we use for this purpose are located in the UK.

AUTOMATED PROCESSING

Where a decision is necessary in relation to your insurance policy, we sometimes make decisions using automated means. The automated process will consider the information that you provide us (for example, details of the property, postcode and local crime rate), to determine whether your application for insurance can be accepted and what the premium will be. Where we make automated decisions, you may request that the decision is reviewed by an individual decision-maker.

HOW WE PROTECT YOUR INFORMATION

To protect your information, we use a range of organisational and technical security measures.

Where we have given you (or you have chosen) a password, you are responsible for keeping this it confidential. Please do not share your password with anyone.

Within i4me, we restrict access to your information to those who need to know it for the purposes set out above.

We use firewalls to block unauthorised traffic to our network.

DATA RETENTION

We retain personal information we collect from you where we have an ongoing legitimate need to do so, for example:

- To provide you with a product or service you have requested us to provide
- To perform our contractual obligations to you
- To comply with applicable legal, tax or accounting requirements
- To defend or manage any claims or complaints between us, you and any relevant third party including taking legal advice in respect of such claims in order to establish, exercise or defend our legal rights or such claims. This would include complaints and claims which you may bring against us or which are submitted to a court, regulatory authority or ombudsman

When we have no ongoing legitimate need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

We have a regulatory obligation to retain data for specified minimum periods, but there are no specified maximum retention periods. We therefore reserve the right to retain data indefinitely for the reasons given above.

ONGOING SERVICES & MARKETING

- Primarily, we will contact you about, products we manage for you, services we provide you and matters relevant to these.
- We will only contact you by post, email, phone, or SMS about promotions or with other marketing material if you have asked us to do so. If you change your mind and would prefer us not to contact you, you can opt out at any time.

INFORMATION WE COLLECT THROUGH COOKIES AND SIMILAR TECHNOLOGIES

We collect information through cookies and other similar technologies (e.g. pixel tags or links), in order to remember you when you visit one of our websites and help us improve your online experience. These help us understand how you and others use our websites, view our products and respond to our advertising, so we can tailor direct marketing and enhance our overall product and service offering.

When you receive direct marketing from us via email, we may use technology as described above to determine your use of and interest in our direct marketing.

When you visit one of our websites, we may record your device information, including hardware and software used, general location, when and how you interact with our websites. This information is retained for direct marketing purposes.

To find out more about cookies and related technologies, please read our separate Cookie Policy.

UPDATES TO THIS POLICY

We may change or update this policy in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. When we update our policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

HOW TO CONTACT US

If you have any questions about how we collect, store or use your personal information, please contact Scott Pinching at:

- 295 Aylsham Road, Norwich, NR3 2RY
- Telephone: 01603 786810
- Email: pinchings@smith-pinching.co.uk