



## DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

### Who we are

Medical Assurance Bureau (Worcester) Ltd collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with data protection regulation and we are responsible as a data controller of that personal data for the purposes of those laws.

When we mention "Medical Assurance Bureau", "MAB", "we", "us" or "our" we are referring to Medical Assurance Bureau (Worcester) Ltd.

Medical Assurance Bureau is a company registered in England and Wales under company number 06434720 whose registered office is at Olivers Mount, Cromwell Crescent, Redhill, Worcester, WR5 2JW. Medical Assurance Bureau (Worcester) Ltd is authorised and regulated by the Financial Conduct Authority (FCA) and is recorded on the Financial Services Register under reference 522008.

Our services are outlined in our Terms and Conditions of business which are issued separately.

### The personal data we collect and use

In the course of providing our service to you we may collect the following personal data when you provide it to us:

- Contact information
- Identity information
- Financial information including income, expenditure and existing investments
- Employment status
- Lifestyle information including health information and past medical history
- Details of your dependents and/or beneficiaries under a policy (**If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below.**)

### Information collected from other sources

We also obtain personal data from other sources in the course of providing our intermediary services. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- Product providers
- From identification and verification checking agencies

### How we use your personal data

Table 1 sets out the main areas of:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Table 1 – How we use your Personal Data

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> <li>• To provide you with financial and tax advice relevant to your circumstances</li> </ul>	Performance of a contract Consent Legal Obligation	Your other professional advisers e.g. Accountants The third-party provider of services such as a Life company or pension platform provider required to research, complete or review your accounts Your investment manager (if relevant)
<ul style="list-style-type: none"> <li>• To provide you with details of products and services from us and third parties that may be of interest to you in accordance with your marketing preferences</li> </ul>	Consent	The third-party provider of services such as a Life company or pension platform provider
<ul style="list-style-type: none"> <li>• To retain records of any services or advice provided to you by us in order to defend the advice provided</li> </ul>	Legitimate Interest Compliance with a legal obligation	Data may be shared or stored by third-party providers on our behalf in a secure manner

### Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as ‘special categories of data’ and include data concerning your health. We do not generally collect or hold data relating to criminal convictions or offences which is also subject to additional levels of protection.

We may process health information and lifestyle information when providing intermediary services in relation to a protection or insurance product. In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of advising on, arranging or administering an insurance contract or (ii) for the establishment, exercise or defence of legal claims.

We are required to verify a client’s identity for anti-money laundering purposes and to aid in the prevention, detection and investigation of financial crime. Where relevant data is obtained we may process such information and will do so on the

basis of lawful processing for the purpose of compliance with regulatory requirements.

## Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

In addition, where you provided your consent, we may provide you with details of products and services of third parties where they may be of interest to you.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences, please contact us:

By phone: 01905 930670

By email: <http://www.medicalassurancebureau.co.uk/contact-us/>

By Post: Medical Assurance Bureau (Worcester) Ltd, Olivers Mount, Cromwell Crescent, Worcester, WR5 2JW.

## Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with intermediary services.

## How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

Type of Record	Retention Period
Financial Advice of any description	We will retain your records for the period of time that we are required to by the UK Financial Services regulator or for the length of time that we retain the liability for the advice provided. This may be indefinitely.
Tax Advice	We will retain your records for the period of time required by HMRC and any published period of time that they can investigate past tax returns.
Other records	We will retain information of a general nature for as long as we feel that it is warranted but will review any requests for information removal on a case by case basis.

## Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

## **Your rights**

You have a right to ask us for more information about the safeguards we have put in place. You have legal rights under data protection regulation in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

### **To access personal data**

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

### **To rectify / erase personal data**

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information) or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

### **To restrict our use of personal data**

You can ask that we restrict our use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful, but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data, but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

### **To object to use of personal data**

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

### **To request a transfer of personal data**

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

### **You can contact us for more information**

If you are not satisfied with the level of information provided in this Privacy Notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to the Data Privacy Manager at Medical Assurance Bureau (Worcester) Ltd, Olivers Mount, Cromwell Crescent, Worcester, WR5 2JW;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

### **Keeping your personal data secure**

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to

your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

### **Our supervisory authority**

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with data protection regulation ([www.ico.org.uk](http://www.ico.org.uk)).

We ask that you please attempt to resolve any issues with us before the ICO.

### **How to contact us**

Please contact the Data Privacy Manager at the address above if you have any questions about this privacy notice or the information we hold about you.