

# REAL INSURANCE GROUP PRIVACY POLICY

## 1. Privacy Policy

Real Insurance Group Ltd understand that you care how information about you is used and shared, and we appreciate your trust and want you to feel confident in our services and security as it relates to your personal information. This notice describes our privacy policy.

The real Insurance Group is governed by The Financial Conduct Authority (FCA) and takes data security and compliance seriously. We are bound by strict procedures and guidelines set by the organizations that we are governed by. In addition, General Data Protection Regulations (GDPR) which is EU wide and far more extensive, seek to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain such as Companies House data.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy statement. By visiting the Real Insurance Group website (or one of its trading style websites) you are accepting the practices described in this Privacy Policy.

## 2. Who we are

Real Insurance Group Limited are insurance brokers principally involved in the B2B sector.

You can contact our Data Protection officer by any means of the following;

### Postal;

Data Protection Officer,

Real Insurance Group Limited, Millennium House, Sovereign Way, Mansfield, Notts. NG18 4LQ.

**Email:** [dpo@realinsurance.co.uk](mailto:dpo@realinsurance.co.uk)

**Telephone:** 01623 889530

## 3. Personal Data

Real Insurance Brokers Ltd will only ask for the information we need to provide insurance quotations, products, claims information, telephone contact and email marketing information which we believe may be of interest to you and your business. In you making initial contact you consent to Real Insurance Brokers Ltd maintaining a marketing dialogue with you until you either optout (which you can do at any stage) or we decide to desist in promoting our services.

Real Insurance Group Limited act on behalf of its clients in the capacity of data processor, such data will be held in either digital and/or paper files.

Personal information collected will include (but not limited to) name, address, date of birth, criminal convictions, health history and all things related to the insurance product sought. Without such information we would be unable to provide product that ensures appropriate insurance covers.

When working exclusively as a data processor, Real Insurance Group Limited will be acting on the instruction of its client and work hard to ensure that the client data held is fully GDPR compliant.

Some personal data may be collected about you from the forms and surveys you complete, or from records of our correspondence and phone calls and details of your visits to our website, including (but not limited to) personally-identifying information like Internet Protocol (IP) addresses. Real Insurance Group Limited may from time to time use such information to identify its visitors. Real Insurance Group Limited may also collect statistics about the behaviour of visitors to its website or one of its associated trading style websites.

Any information Real Insurance Group Limited holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtain about you from public sources and our own suppliers such as credit referencing agencies.

Real Insurance Group Limited will only collect the information needed so that it can provide you with appropriate product/service. Real Insurance Group Limited DO NOT broker or sell your data.

**We collect information about any persons named on product policies, claims or incidents when you;**

- Ask for a quotation or apply for an insurance policy.
- Buy and/or use a product or service supplied by Real Insurance Group Limited.
- Ask us any questions.
- Make, or inform us of a claim or incident.
- Update your personal details.
- Change or amend a policy cover.
- Register a complaint.
- Take part in market research (eg – customer satisfaction survey)

#### **4. Legal basis for processing any personal data**

To meet Real Insurance Group Limited contractual obligations to clients. To provide insurance products that encompass all covers required by the client in their business activities.

#### **5. Consent**

Through agreeing to this privacy notice you are consenting to Real Insurance Group Limited processing your personal data for the purposes outlined in section 4 of this policy. You can withdraw consent at any time by emailing the data control officer at: [dpo@realinsurance.co.uk](mailto:dpo@realinsurance.co.uk) or by phoning 0044 (0) 1623 889530 or writing to us at;

Real Insurance Brokers Limited.  
Millennium House  
Sovereign Way  
Mansfield  
Nottinghamshire  
NG18 4LQ

## **6. Disclosure**

Real Insurance Group Ltd may on occasions pass your Personal Information to third parties exclusively to process enquiries/orders on your behalf. Real Insurance Group Ltd required such parties to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR. As a regulated financial service we are required to comply with legal and regulatory obligations such as the prevention, detection and reporting of fraud and other financial crime. We will process information for our legitimate interests and when we have a business reason to do so.

Such third parties may consist of (but not limited to);

1. Underwriters who require detailed information to ensure adequate and appropriate covers.
2. Credit agencies (Credit scores etc)
3. Geographical (flood scores and location information)
4. Insurance and claims history (previous claims)
5. Information about what you want to insure or make claim for (property information, vehicle information etc)
6. Financial crime and fraud prevention databases
7. Automated decision making and profiling.

We use automated decision making processes to help determine prices, terms, relevant product/services when you ask for a quotation, purchase insurance, make policy changes, renew or make a policy claim. We may also profile you based on information provided by third parties. Profiling may be used to help determine likelihood of a claim or policy transaction being fraudulent.

Real Insurance Group Ltd do not broker or pass on information gained from your engagement with any external source without your consent. However, Real Insurance Group Ltd may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. We may also enforce our Terms and Conditions, including investigating potential violations of our Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Real Insurance Group Ltd, its clients and/or the wider community.

## **8. Retention Policy**

Real Insurance Group Ltd will process personal data during the duration of any contract and will continue to store only the personal data needed for six years after the contract has expired to meet any legal obligations. After six years any personal data not needed will be deleted.

## **9. Data storage**

Data is held in the United Kingdom using different (multiple) servers. Real Insurance Group Ltd does not store personal data outside the EEA.

## **10. Your rights as a data subject**

At any point whilst Real Insurance Group Ltd is in possession of or processing your personal data, all data subjects, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- In the event that Real Insurance Group Limited refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

## **11. Real Insurance Group Limited at your request can confirm what information it holds about you and how it is processed**

*You can request the following information:*

1. Identity and the contact details of the person or organisation (Real Insurance Brokers Limited) that has determined how and why to process your data.
2. Contact details of the data protection officer, where applicable.
3. The purpose of the processing as well as the legal basis for processing.
4. If the processing is based on the legitimate interests of Real Insurance Group Limited or a third party such as one of its clients, information about those interests.
5. The categories of personal data collected, stored and processed.
6. Recipient(s) or categories of recipients that the data is/will be disclosed to.
7. How long the data will be stored.
8. Details of your rights to correct, erase, restrict or object to such processing.
9. Information about your right to withdraw consent at any time.
10. How to lodge a complaint with the supervisory authority
11. Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
12. The source of personal data if it wasn't collected directly from you.
13. Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## **12. To access what Personal data is held, identification will be required**

Real Insurance Group Limited will accept the following forms of ID when information on your personal data is requested:

- A copy of your driving licence, passport, birth certificate and a utility bill not older than three months.
- A minimum of one piece of photographic ID listed above and a supporting document is required. If Real Insurance Group Limited is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to the [dpo@realinsurance.co.uk](mailto:dpo@realinsurance.co.uk), by phoning 0044 (0) 1623 889530 or writing to us at the address further below.

## **12. Enquiries and Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Real Insurance Group Limited or its partners, you have the right to complain to the Real Insurance Group Limited Data Controller. If you do not get a response within 30 days you can complain to the ICO (<https://ico.org.uk/>)

The details for each of these contacts are:

### **Data Related Enquiries**

F.A.O. The Data Controller  
Real Insurance Group Limited  
Millennium House  
Sovereign Way  
Mansfield  
Nottinghamshire  
NG18 4LQ

**Email:** [dpo@realinsurance.co.uk](mailto:dpo@realinsurance.co.uk)

### **Complaint Related Issues**

F.A.O. Mr Steve Taylor  
**Real Insurance Group Limited**  
Millennium House  
Sovereign Way  
Mansfield  
Nottinghamshire  
NG18 4LQ

**Email:** [dpo@realinsurance.co.uk](mailto:dpo@realinsurance.co.uk)

### **13. Conditions of Use, Notices, and Revisions**

Our business changes constantly, and our Privacy Notice and the Conditions of Use will change also. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our Web site frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customer(s).

#### **Real Insurance Brokers Limited**

Registered in England and Wales company number 2690266.

Registered Offices: Millennium House, Sovereign Way, Mansfield, Nottinghamshire NG18 4LQ.

Real Insurance Group is authorized and regulated by the Financial Conduct Authority.

FCA firm reference number 301589.

#### **Useful Links**

**FCA:** <https://www.fca.org.uk/>

**Financial Ombudsman Service:** <https://www.financial-ombudsman.org.uk/>