Privacy Notice

JOURNEYMAN SERVICES LTD

Effective 01 July 2018

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1. Important information and who we are

Introduction

Welcome to Journeyman Services Limited ("JSL") privacy notice.

JSL 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 use our insurance broker services and tells you about your privacy rights and how the law protects you.

You can download a PDF version of the policy on our website at http://www.journeyman-services.com

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

Purpose of this privacy notice

This privacy notice aims to give you information on how JSL collects and processes your personal data when using our insurance broker services, including any data you may provide through our website when you purchase insurance products through us.

This Privacy Notice is not intended for children and we do not knowingly collect data relating to children other than when we place insurance of our insured member's dependent children with our insurance partners.

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. This privacy notice supplements the other notices and does not to override them unless otherwise stated.

Controller

Journeyman Services Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice. 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 here:

Contact Details

Our full details are:

Full name of legal entity: Journeyman Services Limited

Name or title: The Data Protection Officer

Email address: info@journeyman-services.com

Postal address: 3c The Laurels, Parkend Walk, Sling, Coleford, Gloucestershire, GL16 8JJ, United Kingdom

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). 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

This version was last updated on 1st July 2018.

The data protection law in the UK will change on 25th May 2018.

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.

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 as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details. **(We do not store any Financial Data)**
- **Transaction Data** includes details about payments to and from you and other details of insurance products and services you have purchased from us respectively.
- **Technical Data** includes internet protocol (IP) address, your login data, 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.
- **Health Data** includes any medical or clinical data that our insurance providers use to assess and underwrite the medical insurance risk(s) and adjudicate any claims under the insurance policy to provide the insurance coverage and insurance services through our insurance partners.
- **Profile Data** includes your purchases or orders made by you, feedback.
- **Usage Data** includes information about how you use our website, insurance products and services.
- **Marketing and Communications Data** includes your references in receiving marketing from us and our third parties 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 or use of our services. However, if we combine or connect Aggregated Data with your personal data so that is 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 do collect **Special Categories of Personal Data** about you (this includes details about your sex, ethnicity, age, information about your health and genetic data). We do collect information for the detection of fraud and to meet our legal obligations for financial sanctions checks be relevant Government Authorities. Where we process Special Categories of Personal Data (sensitive data), such as Health data, we may reply on one of the legal grounds to do so. Where appropriate we apply an exemption for insurance purposes or you have provided your consent for example where we are assisting you as our client in relation to a claim or claims payment or a representative has been appointed to act on your behalf such as the employer or a relative. Please note that in some cases, if you do not provide your consent, we may not be able to provide our intermediary services to you.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of an (insurance) contract our insurance partners have met with you and you fail to provide that data when requested, we may not be able to perform our services to you or provide the insurance services to you (for example, to provide you with intermediary insurance services). In this case, we may have to cancel the services 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, Health and Financial Data by filling in our application forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:
  - Apply for our intermediary insurance services;
  - Subscribe to our insurance service;
  - Request marketing to be sent to you;
  - Give us some feedback.
- **Automated technologies or interactions:** as you interact with our website, we may automatically collect Technical Data about your equipment. We collect this personal data by using cookies, and other similar technologies.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
  - **Technical Data** from the following parties:
    - **Analytics providers such as Google based outside the EU;**
    - Advertising networks based inside or outside the EU;
    - Search information providers based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technology, payment and delivery services based inside or outside the EU.
- Identity, Health and Contact Data from reinsurers, insurers or aggregators based inside or outside the EU.
- Identity and Contact Data from publicly availably 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 our insurance partners to perform the insurance contract they are about to enter in to or have entered in to with you.
- Where we need to assess any disclosed data including **Health Data** to perform our obligations under the terms of business agreement that we have 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 via email

You have the right to withdraw consent at any time 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 interest 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 A	Type of data B	Lawful basis for processing including basis of legitimate interest C
To register you as a new insured member	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Contact (g) Health	Performance of a contract with you
To process and deliver the insurance services including: (a) Manage payments, fees and charges, where applicable (b) Collect and recover money owed to us, where applicable (c) Process health and medical information for disclosure requirements to the insurance company	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Contact (g) Health	(a) Performance of a contract with you (b) Necessary for our legitimate interest (to recover debts due to us)
To Manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Health (d) Profile (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our insurance products/services)
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 (c) Technical	(a) 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) (b) Necessary to comply with a legal obligation
To deliver relevant website contact and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our insurance 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	(a) Technical (b) Usage	Necessary for legitimates interests (to define types of customers for our insurance products and services, to keep our website updates and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about our insurance services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased an insurance service through us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the insurance services that we provide for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of insurance products and service purchased by you, or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties such as insurance companies, third party medical claims administrators, reinsurers or your medical insurance risks and medical evacuation assistance companies.
- Third parties to whom we may choose to sell, transfer, or merge parts or 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 was 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 the law. We do not allow out 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

Many of our external third parties are 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 may use specific contracts approved by the European Commission which give personal data the same protection is has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield, which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

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 have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have out 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.

By law we have to keep basic information about customers (including Contact, Identity, Financial, Health and Transaction Data) for seven (7) years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstance, you have rights under data protection laws in relation to your personal data. More details of these rights can be found below and at [www.ico.org.uk]. Please see the rights below:

- 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 one month. Occasionally it may take us longer than a month 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 manging our business to enable us to give you the best insurance 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 persona 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 the insurance intermediary contract including processing Health Data for assessing underwriting risk(s) under the insurance products 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

Other organisations that provide IT and system administration services and undertake insurance services.

External Third Parties

- Insurers/Reinsurers providing insurance/reinsurance coverage and services associated with the medical insurance risks under the insurance products.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom and Worldwide who require reporting of processing activities in certain circumstance.

YOUR LEGAL RIGHT

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 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 or 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.