

J L MORRIS Privacy Policy

1. Background

J L Morris [Insurance Brokers] Limited [hereafter **J L MORRIS**] understands that your privacy is important to you and that you care about how your personal data is used or shared online. **J L MORRIS** respects and values the privacy of everyone who visits our website and will only collect and use personal data in the ways that are described in this policy and in a manner that is consistent with our obligations and your rights under the law. This privacy notice explains what you can expect when **J L MORRIS** collects personal information. It applies to information we collect about: visitors to our websites; complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry; people who use our services, e.g. insurance quotations, claims handling people who notify under the Data Protection regulations [often known as GDPR]; job applicants and our current and former employees.

We act as your agent and will collect data, including personal information and risk details, solely to enable us to obtain and provide insurance quotations, arrange and administer your insurance.

Data collected by us is contractual, and for our legitimate business interests as an insurance broker and we will be unable to offer any quotation or insurance if you refuse to provide certain personal data, including health, financial and criminal records data which is collected under the lawful basis of public interest, where these would affect the provision of cover and/or performance of insurance contracts.

Your information will be held securely by us and shared with insurers, which could include reputable providers in other countries, to enable them to provide accurate terms and they will also obtain data about you and your insurance history from various insurance anti-fraud databases, such as the Claims and Underwriting Exchange (CUE) as well as publicly available websites and credit referencing agencies.

We will not give anyone else any personal information except on your instructions or authority, or where we are required to do so by law, or our regulatory requirements.

Information about you and your insurances will be held while you are a client and for a minimum of three years, and in certain circumstances up to six years, after expiry of your policies.

Under the Data Protection Act data subjects have the right to see, and correct, personal information about them that we hold. Please write to our data protection officer at our usual office address if you wish to exercise your rights or have a complaint about our use of your data.

2. Visitors to our websites

When someone visits www.jlmorris.co.uk we use a third-party service, WORDPRESS, to collect browser version information for website functionality and formatting purposes. This information is processed in such a way that the visitor is not identified. We do not make, and do not allow, any third party to make any attempt to find out the identities of those visiting our website. Should we want to collect personally identifiable information through our website, we will make it clear that we intend to collect this information and will explain how we intend to use it.

3. Use of cookies by J L MORRIS

We currently use eight different cookies in the standard operation of our website.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

To opt out of being tracked by Google Analytics across all websites please visit www.tools.google.com.

4. Security and performance

As mentioned above, **J L MORRIS** uses a third-party service, WORDPRESS, to help maintain the security and performance of their website.

5. People who call us

When you call **J L MORRIS** we collect Calling Line Identification [CLI] information along with the date and time of the call. We use this information to help improve our efficiency and effectiveness and for regulatory purposes. We do not record telephone call audio, however, written notes will be taken and added to relevant client files.

6. People who email us

We use Transport Layer Security [TLS] software to encrypt and protect email, and where available, we will use S/MIME enhanced encryption. Should your email service not support TLS, you should be aware that any emails we send or receive will not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

7. People who make a complaint to us

[Please see our Complaints Handling procedure on our website and Section 13 below]

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We are required by the Financial Conduct Authority [FCA] to keep records and report information in regards to the complaints we receive, but not in a form which identifies the complainant.

We usually have to disclose the complainant's identity to whomever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. Should a complainant not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

Information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the "need to know" principle.

8. People who use J L MORRIS services

J L MORRIS offers various insurance services to the public.

We have to hold the details of the people who have requested our services in order to provide those services. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a quotation to follow up for confirmation that our service is required in the future.

We have to share your information with the Insurer[s] to enable them to provide an accurate response. The Insurers in turn must share your information with other Insurers in order to prevent fraud.

9. Job applicants, current and former J L MORRIS employees

J L MORRIS is the data controller for the information you provide during the recruitment process and during your period of employment unless otherwise stated. Should you have any queries about the process or how we handle your information please contact us at recruitment@jlmorris.co.uk

10. What are the lawful bases for processing ?

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever J L MORRIS processes personal data:

(a) Consent: You have given clear consent for J L MORRIS to process your personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract J L MORRIS has with you, or because we have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.

J L MORRIS requires your consent to pass your data to the Insurer in order for them to prepare a quotation and eventually, with your agreement, place that insurance, i.e. enter into a contract in your legitimate interest. In some cases, certain information, e.g. convictions, past claims etc. is required in order to comply with the law.

11. How J L MORRIS decides how long to retain your data

We will only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, 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 that data, the potential risk of harm from unauthorized 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.

12. Your rights

Under the Data Protection Act 2018 [known as GDPR], you have rights as an individual which you can exercise in relation to the information we hold about you – see section 14 below. These include the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly>

13. Complaints or queries

[Please see our Complaints Handling procedure on our website]

J L MORRIS tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of **J L MORRIS'** collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

Should you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office in their capacity as the statutory body which oversees data protection law – www.ico.org.uk/concerns.

14. Access to personal information [GDPR]

J L MORRIS tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a "subject access request" under the Data Protection Act 2018. Should we hold information about you we must:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form, including electronically if requested.

To make a request to **J L MORRIS** for any personal information we may hold you will need to put the request in writing and send it to the address below.

We will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

Where we hold information about you, you can ask us to correct any mistakes, object to the way we handle your data and, where applicable and allowable, request that your data is deleted.

15. Disclosure of personal information [GDPR]

We will not disclose personal data without consent. However, when we investigate a complaint for example, we will need to share personal information with the organisations and individuals concerned and other relevant bodies.

We can provide you with further information on the following :

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to our staff on how to collect, use and delete personal data;
- how we check that the information we hold is accurate and up to date.

16. Links to other websites

This privacy notice does not cover the links within our site to other websites. We encourage you to read the privacy statements on the other websites you visit.

17. Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 31st January 2020.

18. How to contact us

Should you want to request further information about our privacy policy you can call, email or write to us at :

J L MORRIS (Insurance Brokers) Limited

Manor House, 1 Macaulay Road, BROADSTONE, Dorset BH18 8AS

Telephone : 01202 642840

E-Mail : info@jlmorris.co.uk