

Sovereign Insurance Services Limited

Privacy Notice for the Provision of Insurance Broking Services

1. Purpose of this Privacy Notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it in order to provide insurance broking services. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

2. What Personal Data Is

“Personal Data” means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

“Special Category Personal Data” is more sensitive than Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation.

“Criminal offence data” refers to personal data relating to criminal convictions and offences or related security measures. This covers information about offenders or suspected offenders in the context of criminal activity, allegations, investigations, and proceedings.

3. Personal Data We Collect

The Personal Data we collect about you will be the minimum necessary to provide insurance broking services. The type of Personal Data we collect is outlined in the table below in the section entitled “Purposes, lawful bases and retention periods”.

4. How We Collect Your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text, or email and/or via our website.

We may also need to collect Personal Data from third parties such as:

- Lawyers
- Accountants
- Publicly available sources such as WorldCheck.
- Personal representatives nominated by yourself.

5. Cookies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website.

Our website uses cookies. For further information about cookies and how we use them, please see our [Cookie Notice](#).

6. Purposes, Lawful Bases, and Retention Periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Client	Name, date-of-birth and contact details (address, email address, passport, and phone number)	To arrange and administer your insurance contract	Performance of a contract	6 years after end of contract
Client	Bank account details and payment card numbers	To conclude payments and other policy-related transactions	Performance of a contract	6 years after end of contract
Client	Details of claims made by you, (policy number, claim number, photographs, invoices, receipts)	To report claims and assist you during the process	Performance of a contract	6 years after claim is closed
Client	Data captured in respect of complaint-handling (name and policy number)	To investigate and resolve complaints.	Performance of a contract	6 years after complaint is closed
Client	All emails to and from client and insurers detailing contact details, claim number, policy number and evidence to support claim).	To arrange and administer your insurance contract	Performance of a contract	6 years after date of email.
Client	Name and contact details and your preferences in receiving marketing from us and the Sovereign Group	To provide relevant information about products or services, events, or news	Consent	One year after initial contact
Client	Passport (or ID card), driving license, and contact details.	To carry out identity, verification, and sanctions checks.	Compliance with legal obligations	6 years after end of contract or 1 year after quotation if no contract ensues.
Client	Name and contact details for customer satisfaction surveys.	To obtain client feedback on goods and services provided	Legitimate interest	1 year after receipt of feedback
Client	Name, address, date of birth and passport details	To carry out client due diligence procedures	Performance of a contract	6 years after closure of policy

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Special Category and Criminal Offence 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, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences 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 insurance product' and/or
- Criminal conviction or offence information when providing intermediary services in relation to a general 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.

In the course of our activities in relation to the prevention, detection, and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

7. Marketing

We would like to send you information about our products and services, events, and news, which may be of interest to you. Where we have your consent or it is in our legitimate interest to do so, we may do this by email, telephone, or social media.

You can unsubscribe at any time by:

- Contacting us at enquiries@sis.gi" enquiries@sis.gi
- Using the "unsubscribe" link in emails.

You also have the right to object to your personal data being used for direct marketing purposes at any time.

For further information on how we use your personal data for our Group Marketing, please refer to our [Marketing Privacy Notice](#).

8. Sharing your Personal Data

In the course of providing you with this product/service – we may need to share your Personal Data with the following third parties:

- Insurance brokers and financial advisers who help us to arrange, manage and underwrite our products;
- Your employer if you are a member under a policy provided to your employer;
- Other insurers;
- Legal advisers who act on our or your behalf;
- Banks or mortgage lenders.

9. Retention

We will retain your personal data whilst it is required for the relevant purposes or to meet our legal obligations.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Where your information is no longer required, we will ensure it is disposed of or deleted in a secure manner in accordance with our Data Retention Schedule.

10. International Transfers

Your personal data may be shared within the Sovereign Group. This may include transferring your personal data to other Group offices.

We may also share your personal data with 3rd party service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

These standards include Standard Contractual Clauses (SCCs) approved by Gibraltar's Information Commissioner and enable the free flow of personal data when embedded in a contract.

They are the following:

- The International Data Transfer Agreement;

- The International data transfer addendum to the European Commission's standard contractual clauses for international data transfers.

In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

11. Your Rights and How to Complain

You have certain rights in relation to the processing of your Personal Data, including:

- **Right to be Informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of Access** (commonly known as a "Subject Access Request")
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to Rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to Erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to Object to Processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to Restrict Processing**
You have the right to restrict our use of your Personal Data.
- **Right to Portability**
You have the right to ask us to transfer your Personal Data to another party.
- **Automated Decision-making**
You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to Withdraw Consent**
If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to Lodge a Complaint**
You have the right to lodge a complaint with the relevant supervisory authority if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in Gibraltar is the Gibraltar Regulatory Authority who can be contacted online at:

Gibraltar Regulatory Authority
2nd floor

Eurotowers 4
1 Europort Road
Gibraltar GX11 1AA

Tel: (+350) 200 74636
E mail address; info@gra.gi

How to Exercise your Rights

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

12. How to Contact Us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact our Data Protection Officer as follows:

Sovereign Insurance Services Limited
2-4 Ocean Village Promenade
Gibraltar

Email: dpo@sovereigngroup.com

Telephone number: +350 200 52908

13. Changes to this Privacy Notice

We keep our privacy notice under regular review to make sure it is up to date and accurate. We will update this notice accordingly on our website.

This Privacy Notice was last updated in May 2024.