

## Bell & Clements Limited - Privacy Notice

This Privacy Notice is designed to help you, as a customer of Bell & Clements Limited, to understand how we process your personal data.

You are a customer of Bell & Clements Limited and we are the insurance intermediary of your policy. However, you may have purchased your insurance through another party, e.g. through another insurance broker or through an intermediary. Bell & Clements Limited may also act as a Managing General Agent or Underwriter where specific delegated authority has been granted to us by one or more Insurers.

The insurance lifecycle may involve the sharing of your personal data with other insurance market participants, some of which, you may not have direct contact with. You can find out more information about these processors by contacting the intermediary that you purchased your policy from.

<b>The Data Controller for Bell &amp; Clements Limited is:</b>
Bell & Clements Limited 1 Fen Court London EC3M 5BN Tel: +44 (0) 207 283 6222 Website: <a href="https://www.bellandclements.com/">https://www.bellandclements.com/</a>

<b>The Data Protection Officer for Bell &amp; Clements Limited is:</b>
The Data Protection Officer Bell & Clements Limited 1 Fen Court London EC3M 5BN Tel: +44 (0) 203 650 7530 Email: <a href="mailto:dataprotection@bellandclements.co.uk">dataprotection@bellandclements.co.uk</a>

Please contact the Data Protection Officer if you have questions concerning this Privacy Notice or your Data Subject Rights. These include:

- Data Portability: To transfer your personal data to another Data Controller in a machine-readable format.
- Erasure: To have your personal data removed or deleted.
- Rectification: To have your personal data corrected if it is inaccurate.
- Restrict Processing: To restrict processing where your personal data is inaccurate, or the processing is unlawful.
- Subject Access Request: To request access to your personal data and information around its processing.
- To object to direct marketing (Note: we do not do direct marketing).

If you are unhappy with any response or have a complaint, you can raise this with:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: +44 (0) 303 123 1113

## Who your data is shared with

The following are data controllers that we share your personal data with:

- Insurers including Lloyd's of London, Great Lakes Insurance SE and various insurance companies.
- Agents including Managing General Agents and Wholesalers who are able to offer specific insurance products.
- Brokers that may have access to specific insurers or products.
- Government and Regulatory Agencies.
- Legal Advisers.

The following are data processors that we disclose your personal data to:

- Third Parties providing services for Payment of Insurers, Banking, Claims Handling, Insurance Administration and IT Services.

Please contact the Data Protection Officer ([dataprotection@bellandclements.co.uk](mailto:dataprotection@bellandclements.co.uk)) if you require further information on who your data is shared with.

## What information do we collect about you

### Personal Data

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Individual information	<ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Marital status</li> <li>Date and place of birth</li> <li>Nationality</li> <li>Employer</li> <li>Job title</li> <li>Employment history</li> <li>Family details and their relationship to you.</li> </ul>	<ul style="list-style-type: none"> <li>Insurance intermediaries or other insurance market participants.</li> <li>Your family.</li> <li>Your Employer.</li> <li>Credit reference agencies.</li> </ul>	<ul style="list-style-type: none"> <li>Group companies.</li> <li>Insurers.</li> <li>Our agents and brokers.</li> <li>Other intermediaries or market participants.</li> <li>Anti-fraud databases.</li> <li>Medical doctors and</li> <li>Specialists.</li> </ul>	<ul style="list-style-type: none"> <li>Setting you up as a client including checks for potential fraud, sanctions, credit and anti- money laundering.</li> <li>Underwriting, evaluating and pricing of the risks to be insured and calculating and validating the appropriate premium for your policy.</li> <li>Arranging insurance cover (issuing quotations, renewals, policy administration)</li> </ul>	<ul style="list-style-type: none"> <li>Performance of our contract with you.</li> </ul>
				<ul style="list-style-type: none"> <li>Statistical and experience analysis</li> <li>Marketing.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate Interest</li> </ul>
Policy Information	<ul style="list-style-type: none"> <li>Information about the quotes and insurance policies you have applied for or taken out.</li> </ul>	<ul style="list-style-type: none"> <li>Insurance intermediaries or other insurance market participants.</li> <li>Your family.</li> <li>Your employer.</li> </ul>	<ul style="list-style-type: none"> <li>Group companies.</li> <li>Insurers and reinsurers.</li> <li>Our agents and brokers.</li> <li>Other intermediaries or market participants.</li> <li>Anti-fraud databases.</li> </ul>	<ul style="list-style-type: none"> <li>Managing you as a client including, arranging and administrating insurance cover, underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.</li> </ul>	<ul style="list-style-type: none"> <li>Performance of our contract with you.</li> </ul>
				<ul style="list-style-type: none"> <li>Statistical and experience analysis.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate Interest</li> </ul>

Financial Information	<ul style="list-style-type: none"> <li>• Premiums and claims paid on your policies.</li> <li>• Bank account or payment card details.</li> <li>• Income and other financial information.</li> </ul>	<ul style="list-style-type: none"> <li>• Insurance intermediaries or other insurance market participants.</li> <li>• Your family.</li> <li>• Your employer.</li> <li>• Credit reference agencies.</li> </ul>	<ul style="list-style-type: none"> <li>• Group companies.</li> <li>• Insurers.</li> <li>• Our agents and brokers.</li> <li>• Other intermediaries or market participants.</li> <li>• Credit reference agencies. Anti-fraud databases.</li> </ul>	<ul style="list-style-type: none"> <li>• Managing you as a client including administrating insurance cover, underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of our contract with you.</li> </ul>
Statutory and anti-fraud information	<ul style="list-style-type: none"> <li>• Credit history, credit score, sanctions and information from anti-fraud databases concerning you.</li> </ul>	<ul style="list-style-type: none"> <li>• Insurance intermediaries or other insurance market participants.</li> <li>• Your family.</li> <li>• Your employer.</li> <li>• Anti-fraud databases, sanctions lists, court judgements and other government agencies.</li> </ul>	<ul style="list-style-type: none"> <li>• Group companies.</li> <li>• Insurers.</li> <li>• Our agents and brokers.</li> <li>• Other intermediaries or market participants.</li> <li>• Anti-fraud databases.</li> </ul>	<ul style="list-style-type: none"> <li>• Setting you up as a client including checks for possible fraud, sanctions, credit and anti- money laundering.</li> <li>• Managing you as a client including administrating insurance cover, underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of our contract with you.</li> <li>• Compliance with a legal obligation.</li> <li>• Processing is necessary for the defence of legal claims.</li> </ul>
Claim Information	<ul style="list-style-type: none"> <li>• Information about previous and current claims.</li> </ul>	<ul style="list-style-type: none"> <li>• Insurance intermediaries or other insurance market participants.</li> <li>• Your family.</li> <li>• Your employer.</li> <li>• Anti-fraud databases, claimants, defendants, witnesses, experts inc. medical experts, loss adjustors, solicitors and claims handlers.</li> </ul>	<ul style="list-style-type: none"> <li>• Group companies.</li> <li>• Insurers and reinsurers.</li> <li>• Our agents and brokers.</li> <li>• Other intermediaries or market participants.</li> <li>• Anti-fraud databases.</li> <li>• Medical doctors and specialists.</li> </ul>	<ul style="list-style-type: none"> <li>• Managing insurance claims.</li> <li>• Defending or prosecuting legal claims.</li> <li>• Investigating or prosecuting fraud.</li> <li>• Statistical and experience analysis</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of our contract with you.</li> <li>• Compliance with a legal obligation.</li> <li>• Processing is necessary for the defence of legal claims.</li> <li>• Legitimate Interest</li> </ul>

## Special Categories of Personal Data

Categories of data	Type of information processed	Source of the data	Who we disclose the data To	Purpose of processing	Lawful basis of processing
Individual Information	<ul style="list-style-type: none"> <li>• Gender and health information.</li> <li>• Medical reports.</li> <li>• Criminal records and convictions.</li> </ul>	<ul style="list-style-type: none"> <li>• Insurance intermediaries or other insurance market participants.</li> <li>• Your family.</li> <li>• Your employer.</li> <li>• Medical doctors and specialists.</li> </ul>	<ul style="list-style-type: none"> <li>• Group companies.</li> <li>• Insurers and reinsurers .</li> <li>• Our agents and brokers.</li> <li>• Other intermediaries or market participants.</li> <li>• Anti-fraud databases.</li> <li>• Medical doctors and specialists.</li> </ul>	<ul style="list-style-type: none"> <li>• Setting you up or managing you as a client.</li> <li>• For arranging insurance.</li> <li>• Evaluating and pricing the risks to be insured and calculating and validating any appropriate premium where there is health or life insurance.</li> <li>• Claims Purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of the contract with you or consent.</li> <li>• Processing is necessary for the defence of legal claims.</li> </ul>
Statutory and anti-fraud information	<ul style="list-style-type: none"> <li>• Criminal records and convictions.</li> <li>• Surveillance reports.</li> </ul>	<ul style="list-style-type: none"> <li>• Insurance intermediaries or other insurance market participants.</li> <li>• Your family.</li> <li>• Your employer.</li> <li>• Anti-fraud databases, sanctions lists, court judgements and other government agencies.</li> </ul>	<ul style="list-style-type: none"> <li>• Group companies.</li> <li>• Insurers and reinsurers</li> <li>• Our agents and brokers.</li> <li>• Other intermediaries or market participants.</li> <li>• Anti-fraud databases.</li> <li>• Medical doctors and specialists.</li> </ul>	<ul style="list-style-type: none"> <li>• Setting you up or managing you as a client.</li> <li>• For arranging insurance.</li> <li>• Evaluating and pricing the risks to be insured and validating any appropriate premium where there is health or life insurance, including checks for potential fraud, sanctions, anti-money laundering and other statutory checks.</li> </ul>	<ul style="list-style-type: none"> <li>• Processing carried out under the control of official authority.</li> <li>• Processing is necessary for the defence of legal claims.</li> </ul>

## Protection of your information

Your privacy is important to us and we follow strict security and organisational procedures in the processing, storage, destruction and disclosure of your information. This is to prevent unauthorised access or loss of your information.

## Use of your Consent to process Special Categories of Personal Data

In order to provide insurance, in certain circumstances we may need to process special categories of personal data, such as medical records or criminal convictions.

We follow the lawful basis that your insurer has used in processing and disclosing your special categories of personal data to us. This may be for the performance of the insurance contract or consent. If consent is used, you will not have given your consent directly to us but to the insurance intermediary that you purchased your policy from. You may withdraw your consent for us to process your special categories of personal data at any time by contacting the Data Protection Officer (details as above). However, if you withdraw your consent this will impact on our ability to provide or continue to provide for your insurance policy or pay claims.

## Marketing

If you have opted in to receive marketing material, Bell & Clements Limited or group companies will contact you from time to time by telephone, post, newsletter, email or SMS to keep you informed with news, products or services, including but not limited to insurance together with carefully selected offers or promotions which we feel may be of interest to you. Other carefully selected companies may also contact you.

If you would like to receive marketing material or you have opted in and want it to stop, please contact us by using the email address [dataprotection@bellandclements.co.uk](mailto:dataprotection@bellandclements.co.uk), or write to The Data Protection Officer at the above address.

## Data Retention

Your personal data will only be kept for as long as it is necessary for the purpose it was collected for.

Category of data	How long we retain your data
Insurance policies, proposal forms, renewal notices, certificates, etc.	In accordance with accounting and tax requirements or, if later, until claims under policy are closed and all outstanding claims are settled
Each new risk that is quoted but not taken up	No longer than 13 months
Each new risk that is underwritten	7 years for short tail (Property and Casualty) 40 years for long tail (Employers Liability)
Any material aggregation of exposure to risk from a single source or of the same kind or to the same potential catastrophe or event	10 years
Each notified claim including the amounts notified and paid, precautionary notices and any re-opened claims	7 years from date of closure of claim. Unless specific jurisdictional requirements dictate a longer period.
Claims correspondence	At least 7 years after claims settlement
Policy and contractual documents and any relevant representations made to policyholders	7 years for short tail and 40 years for long tail
Other events or circumstances relevant to determining the risks and commitments that arise out of contracts of insurance or contracts for insurance	7 years for short tail and 40 years for long tail

Commented [CKLM1]: ML to speak to AM about this

Where the retention period is set by reference to the tail of the business, the period commences when there is a reasonable expectation that no further claims would be notified under the relevant policy.



## **Transfer of Data**

We may transfer your personal data outside the UK or EEA where there may not be an equivalent level of data protection. We will always ensure compliance with any local data protection legislation.

These transfers will only be made where it is for the performance of our contract with you.

Your personal data may be disclosed to companies within our Group or to Service Providers outside the UK or EEA.

You can find out the details about any other party we have shared your personal data with by contacting the Data Protection Officer at the address provided at the top of this Privacy Notice.

## **Changes to this Bell & Clements Limited - Privacy Notice**

If we make changes to this Privacy Notice that affects how we process your information, we will revise the Privacy Notice and publish it on our website.