

Sub-Broker Privacy Policy v 1.1 27/03/2019

Advance Schemes Limited and its affiliated companies and subsidiaries (collectively referred to as "we," "us" or "our") respect your clients privacy. This Privacy Policy Statement describes the ways we collect information from and about your client, and what we do with the information, so that you may decide whether or not to provide information to us. By accessing our website, or purchasing our products or services you agree to this Privacy Statement in addition to any other agreements we might have with you. This Privacy Statement does not govern the practices of entities that our Company does not own or control, or entities that do not own or control our company or people that our Company does not employ or manage. This Privacy Policy Statement includes the Company's Privacy Policy Statement.

Privacy Policy Statement

1. Our Collection of your clients Personal Information

The information we collect may include your clients personal information, such as their name, contact information, IP addresses, product and service selections and date of birth, marital status, gender, driving licence number, medical history, criminal records, etc. We collect personal information from you at different points, including but not limited to the following:

- when we correspond with you regarding a customer or prospective customer;
- when you visit our website;
- when you take out an insurance policy via us;
- when you contact us for help; and
- If you contact us to arrange a change to or renew a policy.

2. Our Use of your clients Personal Information

Our Company may use information that we collect about you to:

- deliver the products and services that you have requested;
- manage your customer relationship and provide you with customer support;
- perform research and analysis about your use of, or interest in, our products or services;
- communicate with you by e-mail, postal mail, telephone and/or mobile devices about products or services that you may hold with us, may be of interest to you either from us, or other third parties;
- verify your eligibility to credit facilities; and
- transfer personal information to third parties for any legally permissible purpose in our sole discretion.
- enforce our terms and conditions.
- Quotation/Inception:
 - Setting up your client, including possible fraud, sanctions, credit and anti-money laundering checks
 - Evaluating the risks to be covered and matching to appropriate policy/ premium
 - Payment of premium where the insured/policyholder is an individual
- Policy administration:
 - Client care, including communicating with you and sending you updates
 - Payments to and from individuals
- Claims Processing:

- Managing insurance and reinsurance claims
- Defending or prosecuting legal claims
- Investigation or prosecuting fraud
- Renewals:
 - Contacting you to renew the insurance policy
 - Evaluating the risks to be covered and matching to appropriate policy/ premium
 - Payment of premium where the insured/policyholder is an individual
- Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:
 - Complying with our legal or regulatory obligations
 - General risk modelling
 - Transferring books of business, company sales & reorganisations

We DO NOT sell personal information to third parties.

3. Our Disclosure of your clients Personal Information to Third Parties

We may share your clients personal information with third parties only in the ways that are described in this Privacy Statement:

- we may provide your clients information to our partner insurers and service providers who perform functions on your/our behalf;
 - we may provide your clients information to our service providers who perform functions on our behalf. Usually our service providers sign a standard confidentiality agreement;
 - we may share your clients data with any parent company, subsidiaries, joint ventures, other entities under a common control or third party acquirers. We would direct these other entities to honor this Privacy Statement;
 - we may allow a potential acquirer or merger partner to review our databases, although we would restrict their use and disclosure of this data during the diligence phase and direct them to treat the data confidentially;
 - as required by law enforcement, government officials, or other third parties pursuant to a court order, or other legal process or requirement applicable to our Company; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our agreements or Company policies; and
 - other third parties with your consent or direction to do so.
- Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in your country.

4. Our Security Measures to Protect your Personal Information

Our systems have security measures in place to help protect information under our control from the risk of accidental or unlawful destruction or accidental loss, alteration or unauthorised disclosure or access. Our security measures include, but are not limited to the following:

- Physical security of office
The office is locked overnight. All drawers and file cabinets that may hold Personal Information are locked and the keys removed. Keys are kept in a locked lock-box when not in use, the key to this is hidden within the office.
- Clear desk policy
Employees lock any papers that contain Personal Information in desk drawers overnight, the drawer keys are secured in a lock-box (see above).
- Paperless Office
Any printed documents that contain Personal Information are shredded as soon possible.
- Computers passworded

- All PC's/MAC's are turned off at close of business and require a password to access them when turned on. Each PC/MAC has a different password set by the user. Passwords are not shared.
- Third Party systems passworded
All third party systems require password access. Passwords are unique to the individual user, users do not share passwords.
- No removal of personal data from office
Employees are not permitted to remove Personal Information from the office via any medium (email, memory stick, etc).
Third Party Permission
- We will not provide Personal Information to any member of your clients family, friends, etc without your clients express written consent.

5. Our Use of Cookies and Links

Our web pages use "cookies." Cookies are text files we place in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering at one of our sites. However, once you choose to furnish the site with personal information, this information may be linked to the data stored in the cookie. We use cookies to understand site usage and to improve the content and offerings on our site. We also may use cookies to offer you products or services. You have many choices with regards to the management of cookies on your computer. All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage cookies, please consult the privacy features in your browser.

We may create links to other web sites. We will make a reasonable effort to link only to sites that meet similar standards for maintaining each individual's right to privacy. However, many other sites that are not associated with or authorized by our Company may have links leading to our site. Our Company cannot control these links and we are not responsible for any content appearing on these sites. Since our website does not control the privacy policies of third parties, you are subject to the privacy practices of that third party. We encourage you to ask questions before you disclose any personal information to others.

6. Our Retention of your clients Personal Information

We will retain any personal information only for as long as is necessary to fulfill the business purpose it was collected. We will also retain and use your personal information for as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

7. International Transfers of your clients Personal Information

Information collected from you may, on occasion be stored and processed outside the UK in any other country in which our Company or agents maintain facilities, and by accessing our sites and using our services, you consent to any such transfer of information outside of your country.

8. Your Access to and Updating of your clients Personal Information

Reasonable access to your clients personal information may be provided at no cost upon request made to our Company at the contact information provided below. If access cannot be provided within that time frame, our Company will provide the requesting party a date when the information will be provided. If for some reason access is denied, we will provide an explanation as to why access has been denied.

9. Changes to our Privacy Statement

This Privacy Notice is subject to change. It was last updated on 19/04/2018. If we make changes to this Privacy Notice, we will update the date it was last changed.

10. Contacting Us

If you have any questions about this Privacy Statement, our practices or have any concerns please contact our Privacy Officer at:

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Cotterells
Hemel Hempstead
Hertfordshire
HP1 1AX
info@advanceschemes.com
01442 256783