



## Privacy Notice

### Legal basis for processing data

Processing data is necessary for the purposes of legitimate interest pursued by Sturdy Edwards (Insurance Brokers) Ltd as an insurance intermediary except where such interests are overridden by the interests, rights or freedoms of the data subject (you).

### What Information we collect about you

When you contact us for an insurance quotation we collect the relevant information needed by an insurer to calculate the premium and understand your insurance needs. The information varies dependent on the risk to be insured.

### When we collect this information

We collect this information during our meetings and/or telephone conversations with you, through our exchange of e-mails and through the completion of proposal forms and fact finds or via online submission forms.

### How we store your personal data

Data is held securely both electronically and in hard copy (paper form). Adequate virus protection and firewalls are in place, and access to data is password protected. Paper files are securely shredded off site.

### To whom data is shared

We may share personal information with relevant parties to the contract; Insurance Companies, Placing Brokers, Managing General Agencies, Claims Handlers, Loss Adjusters, Finance Providers and Credit Reference Agencies. Additionally, we share information with our associated company, Sturdy Edwards (Financial Services) Ltd.

### How long we will keep your data for

Non personal data (e.g. company data) will be held for up to 50 years, as this may be required in the event of an employer's liability or public liability claim.

Personal Data will be held for 6 years after the last dealing with a data subject. Electronic files that are no longer in use will be 'zipped', but can be deleted at your request.

### Your rights to access your data

Under the General Data Protection Regulations you have a right to obtain a copy of the personal information that we hold about you free of charge.

If you believe that any information held is incorrect or incomplete, you should contact us (see contact details below). Any information that is found to be incorrect or incomplete will be amended promptly.

### Erasure Rights

You have the right to request the deletion or removal of your personal data if you feel there is no compelling reason for its continued processing.

### Your right to object

Under the GDPR you have the right to object to us processing personal data based on grounds relating to your particular situation. If you object to us processing your personal data we will stop unless: there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or, the processing is for the establishment, exercise or defence of a legal claim.

### Your right to complain

You have a right to complain to the Information Commissioners Office if you feel there is a problem with the way we are handling your data. Please contact <https://ico.org.uk/concerns/handling/>



## **Marketing**

We take your privacy seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us. We will not use your information or share your information with any other non-associated company for marketing purposes without your prior consent.

## **Contact Details**

If you need any further information or need to contact us please write to us at: Mr David Epstein, 193-193a London Road, East Grinstead, West Sussex, RH19 1HA, Telephone: 01342 313 733, E-Mail: [ins@sturdy-edwards.co.uk](mailto:ins@sturdy-edwards.co.uk)

## **Use of 'cookies'**

Sturdy Edwards (Insurance Brokers) Limited Website at [www.sturdyedwards.co.uk](http://www.sturdyedwards.co.uk) uses 'Session Cookies' These cookies last for the session the visitor is on our site. This is helpful as it will speed-up navigation from one page to another during the visit (session). Once the visitor leaves our site the cookie stops and does not remain on the visitor's PC or phone. 'Permanent Cookies' on the other hand, as the name suggests, persist after the visitor has left a site to remain on the visitor's PC or phone. These cookies can all be turned-off and removed easily using your browser's preference settings which will vary depending on which browser you use. Sturdy Edwards' Website at [www.sturdyedwards.co.uk](http://www.sturdyedwards.co.uk) does not use 'Permanent Cookies'.

[Click the link to our Cookies Guide at the foot of our website](#)

## **Links to and from external Websites**

Our Website contains links to external Websites run by other organisations. This privacy policy applies only to our Website, not those external Websites that we link to, who will have their own privacy policies. We are not responsible for these external Websites and their privacy policies and practices. In addition, if you linked to our Website from an external site, we cannot be responsible for the privacy policies and practices of the owners and operators of that external Website and recommend that you check the privacy policy of that external site.

## **Data Stored within UK and Europe (EU)**

Our data is held on servers located in UK and Europe (EU) where data protection legislation is governed by UK and European (EU) laws and regulations. (GDPR and the UK Data Protection Act 2018)

## **Interruptions and Omissions in Service**

Every effort is made to ensure that our Website is accurate, secure and accessible at all times. However, Web and Internet connections can fail from time-to-time which is beyond our control. Although rare, service breaks are typically temporary amounting to as little as a matter of minutes in some cases. We do not accept any liability arising from any such errors, omissions, interruptions or delays or any ongoing obligation or responsibility to operate this Website (or any particular part of it) or to provide the service offered on this Website. We may vary the specification of this site from time to time without notice.

## **Your Use of our Website**

You may only use this Website for lawful purposes when seeking information. You must not under any circumstances seek to undermine the security of the Website or any information submitted to or available on it. In particular, but without limitation, you must not seek to access, alter or delete any information to which you do not have authorised access, seek to overload the system via spamming or flooding, take any action or use any device, routine or software to crash, delay, damage or otherwise interfere with the operation of this Website or attempt to decipher, disassemble or modify any of the software, coding or information on the Website.



### **Information on our Website**

Whilst we make every effort to ensure that the information on this site is accurate and complete, we do not accept any liability arising from any inaccuracy or omission in any of the information on our Website or any liability in respect of information on our Website supplied by you, any other site user or any other person.

### **Choice of Law and Jurisdiction**

The use of this Website and any agreements entered into through this Website are to be governed by English law. The courts of England are to have exclusive jurisdiction to settle any dispute arising out of or in connection with the use of this Website or any agreement made through this Website.

### **Data Protection Acts 1998 (GDPR and UK DPA May 2018)**

This Act of Parliament which set out principles relating to the use of data to ensure that the rights of the person who is the subject of the data are protected under the law, the forthcoming GDPR European Directive on data protection and the UK Government's Data Protection Act (DPA) which will come into force at the same time.

### **Personal Data**

Personal data is defined as data which relates to a living individual or organisation who can be identified from their data, or from their data and other information which is in the possession of or is likely to come into the possession of **Sturdy Edwards (Insurance Brokers) Limited**.

For full details of personal data and your rights, please visit the Information Commissioners Office Website at <https://www.ico.org.uk/>

### **Third Parties**

These are companies and people other than **Sturdy Edwards (Insurance Brokers) Limited**.

### **Users and Visitors**

People who use our Website and register their details with us for the purposes of commenting about our site, gain more information about our services and general business activities.

### **Review of this Policy**

We keep this Policy under regular review. This Policy was last updated in June 2018.

Authorised and regulated by the Financial Conduct Authority