

# Samphire Services Ltd

## Privacy Policy

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This privacy notice contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

## Who we are

Samphire Services Ltd (**Samphire risk**) and provides professional services to the Lloyd's, London and international insurance markets. Samphire collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulations which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use.

## Information collected by us

In the course of providing insurance services we collect a variety of personal information by phone, email and postal correspondence, through the use of our website, and during our dealings with clients, regulators. Personal information we collect includes the following:

Type of Personal Information	Example
Individual details	<ul style="list-style-type: none"> <li>• Name and title</li> <li>• Home address, personal email address, telephone numbers</li> <li>• Date and place of birth</li> <li>• Nationality</li> <li>• Gender</li> <li>• Marital status</li> <li>• Employer, job title, employment history, work email address and telephone numbers</li> </ul>
Official identification details	<ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• Passport</li> <li>• Driving licence</li> </ul>
Special categories of personal information	<ul style="list-style-type: none"> <li>• health data</li> </ul>

Samphire and Samphire Risk are trading names of Samphire Services Limited which is an appointed representative of Davies MGA Services Limited, a company authorised and regulated by the Financial Conduct Authority under firm reference number 597301 to carry on insurance distribution activities. Samphire Services Limited is registered in England and Wales company number 13421262.

Registered Office: 3rd Floor 1 Ashley Road, Altrincham, Cheshire, United Kingdom, WA14 2DT. Trading Office: Samphire Risk, 3rd Floor, 70 Gracechurch Street, London EC3V 0HR.

Type of Personal Information	Example
Financial information	<ul style="list-style-type: none"> <li>• Credit history and credit score</li> <li>• Source of income and amount</li> <li>• Details of assets</li> </ul>
Risk details	<ul style="list-style-type: none"> <li>• criminal convictions or fraudulent activity</li> <li>• Directors' disqualification orders and undertakings</li> </ul>
Anti-fraud information	<ul style="list-style-type: none"> <li>• Information obtained through sanctions checks</li> <li>• Information received from various antifraud databases</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Information obtained through general correspondence</li> <li>• IP address and domain name, location data and other information collected if you visit our website</li> <li>• Information obtained by other electronic means if you visit our offices, such as door access cards and CCTV footage</li> <li>• Dietary information if you attend one of our events</li> </ul>

#### Information collected from other sources

We also obtain personal information from other sources as follows:

- your employer
- broker and other insurance market participants such as insurance agents, service providers, reinsurers, other insurers, third party agents, legal advisers, loss adjusters and claims handlers
- credit reference agencies and background reference agencies
- recruitment agencies
- antifraud databases, sanctions lists, court judgements and other databases
- government agencies and regulators
- publicly available information such as the electoral register and social media websites

- in the event of a claim, third parties including any other party to the claim (such as a claimant/defendant), witnesses, experts, medical experts, hospitals and other healthcare provider, loss adjusters, lawyers and solicitors, and third party claims handlers.

#### **How we use your personal information**

We use to:

- provide insurance services to our clients;
- monitoring our compliance with the laws and regulations that affect us
- business to business emails regarding information about our business, and invitations to events we hold
- for our own analysis so we can improve our business and ensure we are offering appropriate insurance products

We will share personal information with regulators including the Financial Conduct Authority, law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

#### **How long your personal information will be kept**

We will hold personal information we collect for the period we are required to retain this information by applicable legal and regulatory provisions which will be currently 6 years from the termination of our arrangements or such other period specified in our Data Retention Policy.

#### **Reasons we can collect and use your personal information**

Under the GDPR, we must always have your consent or a legal basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it (legal basis). You may withdraw your consent to such processing at any time. However, if you

#### **Transfer of your information out of the EEA**

We may need to transfer your data to insurance market participants or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the GDPR. If you would like further details of how your personal data would be protected if transferred outside the EEA, please contact the data controller at Samphire (see 'How to contact us' below).

## Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

Email, call or write to us OR contact Charlie Hanbury, our Data Protection Officer/Controller.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>.

## Changes to this privacy notice

We may change this privacy notice from time to time.

## How to contact us

If you have any questions about this privacy notice or the information, we hold about you then you can contact us:

Samphire Services Ltd

3rd Floor 1 Ashley Road

Altrincham

Cheshire

WA14 2DT

[Charlie.Hanbury@samphirerisk.com](mailto:Charlie.Hanbury@samphirerisk.com)

## Do you need extra help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).