# Privacy Policy

Broker website and online product portal: FCA authorised brokers, agents and accounts paying on account

## About Us

Nice 1 Limited is committed to protecting the privacy and confidentiality of all individuals and takes its responsibilities regarding the security of data very seriously. We abide by the rules of the General Data Protection Regulation (GDPR) upheld by the Information Commissioner Officer (ICO) and are authorised and regulated by the Financial Conduct Authority (FCA) to arrange or bring about non-investment insurance products. This includes processing any personal data lawfully, fairly and in a transparent manner.

References in this Privacy Policy to "we", "our" or "us" (or similar) are references to Nice 1 Limited, registered in England under company No 6082902 at registered office Nice 1 House, Broad Lanes, Bilston, West Midlands WV14 0RQ. Nice 1 Limited is authorised and regulated by the Financial Conduct Authority, FCA reference No 650309.

References in this Privacy Policy to "you", "your" or "your clients" (or similar) are references to you and your clients and can mean both or either.

## Information collected via our website/online product portal

We collect web usage information when you visit our website/online product portal (website) including information such as the date, time, page viewed or searched relating to your browsing activity. Where you have provided personal data, we may collect web usage information to enable us to build a demographic profile.

We may also use web usage information to create statistical data regarding the use of our website. Where statistical data is produced, we may then use that data to help us assess the effectiveness of marketing campaigns, develop and deliver services and information to improve the overall effectiveness of our website. We will also use IP addresses to analyse trends, track users' movements and gather broad demographic information for our own internal use.

Within our website you can interact with us, if you so wish. Where you provide your personal data on our website it will be taken as a positive action that you would like us to contact you for the purpose as set out on our website.

## Cookies

When you visit our website, we may store some information (commonly known as a cookie) on your computer. Cookies do not damage your computer. Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about you. Cookies are specific

to the server that created them. They cannot be accessed by other servers. You do not have to accept cookies. You can decide if you want to accept cookies by changing the settings on your browser to either accept, reject or notify you when a cookie is set. All cookies used by this website are used in accordance with current UK and EU Cookie Law.

### Type of Cookie Purpose

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website. Like most websites, our site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website. Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us.

Please see our Cookies Policy for more detail.

## Linking to third party websites

We do not take responsibility for the privacy polices or practices of other sites, even where you access them using links from our website. You are advised to read the Privacy Notice of other websites prior to using them.

## FCA Authorised Intermediaries

Nice 1 Limited only deals with/via intermediaries who are authorised by the FCA. As part of verifying the identification of FCA authorised insurance intermediaries we will use credit safe, which is a well-known identification source. Once this check has been completed the information provided to us will be held on your file to evidence that we have verified who you are. If you would like to know more about the search, please do not hesitate to contact us. We will also request copies of various company details including but not limited to insurances and policies and procedures that you must have in place to maintain your FCA authorised status.

## What information do we collect about you if you are interested in our services and why?

As part of our service we will only collect information from you for products that may be suitable for you or which you have shown an interest in.

When obtaining information from you we will usually only do this via our website; however, if an anomaly occurs and we need to verify an aspect of your data we may do this by phone, email or post to confirm the accuracy of the data collated. It is important that all the data we hold about you is accurate so that you can be provided with suitable products.

We may collect and process the following Information about you and your clients:

1. Information relating to (but limited to) the following categories of information: (1) contact data (such as e-mail address and phone number); (2) demographic data (such as gender, date of birth and address and postcode (or equivalent)); and (3) other identifying information that is voluntarily provided to us, including without limitation unique identifiers such as passwords, and Information in emails or letters that are send to us,
2. Information provided by filling in forms on our website, including information provided at the time of registering to use our website and other information relating to client quotations or application for policies or information provided requesting further services,
3. Information you provide us, or that we may collect from you, when you report a problem with our Platform or a policy,
4. a record of correspondence if you or your clients contact us,
5. general, aggregated, demographic and non-personal Information,
6. details about computer(s) used to contact us, including but not limited to IP addresses, operating systems and browser types, as well as information about your general internet usage (e.g. by using technology that stores information on or gains access to your device, such as cookies, tracking pixels, web beacons, etc., (together, "Cookies"),
7. your email address from a third party if you indicate that you have consented to that third party sharing your Information with us,
8. any other Information we consider necessary to enhance your experience on the website.

In addition, we may collect criminal offence data where required to do so to arrange a policy on your behalf.

## Information from other sources

We may obtain information from other sources such as public records, if required. This is to enable us to verify who you are or facts that you have told us are accurate.

## How will we use this information?

We will only use your data in ways that you would reasonably expect us to. Below summarises how we use your data.

We will use the information you provide to us to enable you to find a suitable policy that meets your circumstances and needs.

We will use the information provided to us to either populate product quotations or complete applications when purchasing a policy. This information will be retained for the statutory time frame

for meeting our obligations which may change from time to time and which will be forwarded to the relevant insurer where applicable.

Your data will also be used to assist the insurer's claim handler or if a complaint is raised because you are not happy with the service you have received or for renewal documentation if applicable.

As part of our service we like to keep our customers up to date with new products or offers that are available and maybe of interest. Therefore, we may contact you from time to time through email marketing, phone, text, or other types of marketing material. If you wish to opt out of this at any point then please let us know.

In the interest to improve our services, telephone calls may be monitored and/or recorded for training purposes and to assist us handle a query or complaint. Where we record the call you will be informed of this.

## The lawful basis on which we use this information

How we use your information (detailed above) we will do so using the lawful basis legitimate interests. We have decided upon this basis as it allows us to meet with the ICO and FCA rules and is the most suitable lawful basis for processing data with a view to arranging a policy.

## Who will it be shared with?

Where required we may forward your details onto regulatory authorities or fraud agencies where we have a legal obligation to do so to comply with our regulatory requirements or where fraud is suspected. We may do this under the lawful basis legal obligation.

To offer you our services, we may engage with businesses who are affiliates of us and/or non-affiliated service providers (e.g. marketing companies, government entities, regulators, payments processers to process online transactions, etc.). You understand that it is important that such businesses have access to the relevant Information to perform their functions. We will ensure that these businesses do not use your Information for other purposes. By using our website, you hereby freely and specifically consent to the transfer, storage, use, and disclosure of your Information among businesses who are affiliates of us and/or non-affiliated service providers, wherever located. These businesses shall be contractually bound to respect the confidentiality of your Information.

In the event that we or substantially all of our assets are acquired, subscriber and customer information will be one of the transferred assets.

## What we will do to ensure the security of personal information

We will not share any of the information you provide to third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us regardless of whether the information is in electronic or physical format. We use

leading technologies and security measures to safeguard your information and keep strict security standards to prevent any unauthorised access to it.

We use encryption technology to secure your information during transmission to/from our website as well as external firewall and on-host firewall technology to prevent network level attacks. Only those authorized employees, contractors, and agents who need to know your information in connection with the performance of their services are allowed to access this information.

It is important for you to protect yourself against unauthorised access to your password and to your devices used to access our services. You are responsible for keeping your password confidential. For example, ensure that you sign off when you have finished using a shared device.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to/from our website and any transmission is at your risk.

## How long will we retain your data

We will only hold data for no longer than is necessary. We will keep your file including your personal data and any call recording, on record for a minimum of six years, in line with our regulatory obligation with the FCA. Where we need to hold your file for longer than this then we will inform you of this.

## What are your rights?

You have the right to:

- Be informed about how we use, share and store your personal information,
- Request access to the personal data we hold about you (also known as a Subject Access Request (SAR)). Where a SAR is requested, we will respond promptly and within one month from the date we receive the request,
- Request your personal data is amended if inaccurate or incomplete,
- Request your personal data is erased where there is no compelling reason for its continued processing and we don't have a legitimate interest to retain it,
- Request that the processing of your data is restricted,
- The right to object to your personal data being processed,
- Rights in relation to automated decision making and profiling.

Where the processing of your data is based on your consent, you have the right to withdraw this consent at anytime by contacting us by phone or email. We do not use automated decision making or profiling systems.

## Marketing

Where we need your consent, we will ask for this separately. We do not use pre-ticked boxes or make assumptions that you have given your consent. Your consent must be freely given by positively opting in or making a clear affirmative action that you are giving your consent. We and/or your insurance intermediary will do our very best to ensure you know exactly what you are consenting to and remind you that you may withdraw your consent at any time by contacting either of us by email or phone. Where consent is obtained a record of this will be made confirming what you have consented to, the time and date and how consent was obtained.

**Customers:** Our customers are important to us however we appreciate that on some occasions you may wish to look elsewhere. If you do, we would like to stay in touch and therefore will ask for your consent in order for us to do so.

**Potential Customers:** Where you have expressed an interest in a product but have then decided not to proceed, we would like to keep in touch therefore will ask for your consent to do so in case a product maybe of interest to you at a later date.

**Non-Customers:** We will only send you information about regulated products or services if we have obtained your consent to do so.

## Right to complain

We hope that the service you receive from us is to the high standard you would expect. If at any point you are unhappy with the way we have used your data then please notify us by either email or phone below for the speediest response. If you remain concerned about the way we collect or use your personal data, you can raise your concern with the Information Commissions Office (ICO) on 0303 123 1113. For further details you may visit the ICO website www.ico.org.uk

We will tend to disclose the complainant's identity to whoever the complaint is about, however if you wish your identity to remain anonymous, we will try to respect that. We will keep your complaint on record for two years once closed or six years if it also relates to how we arranged a policy and falls under the FCA ruling.

## Changes to our Privacy Policy

Our business changes constantly, and our Privacy Policy may therefore also need to change. We will post the current version of this Privacy Policy on the website and each such change will be effective upon posting on the website or upon the date designated by us as the "effective date".

We may e-mail periodic reminders of our notices and conditions, but you should check our website frequently to see recent changes.

It is your obligation to regularly check the Privacy Policy. Your continued use of the website following any such change constitutes your agreement to this Privacy Policy as so modified.

## How to contact us

If you have a query about any data matter please contact us at:

**Email:** support@nice-1.co.uk

**Tel:** 03333 585960