privacy notice.

1. PURPOSE OF THIS NOTICE

This privacy notice explains how Bspoke Underwriting Ltd. ("we," "our," "us") collects, uses, shares, and protects personal data. It applies to individuals whose personal data we process in connection with the provision of insurance services, in both personal (consumer) and commercial (business) contexts.

This includes the following categories of individuals:

- **Prospective Customers, Policyholders and Insured Persons**
  People whose personal information is provided to us in connection with an insurance quotation, policy, renewal, mid-term adjustment or claim through a broker, coverholder, intermediary, claims administrator, managing agent or other authorised distribution or service partners. This includes prospective, current and former policyholders, insured individuals, and employees, directors, officers or other representatives covered under a commercial insurance policy.
- **Claims-related Individuals and Representatives**
  People connected to a policy or claim, including claimants, witnesses, beneficiaries, dependants, loss payees (such as lenders), and others involved in or affected by the claims process. This also includes people authorised to act on behalf of another person, such as those holding a power of attorney, legal guardians, carers or other representatives.
- **Business Contacts and Partners**
  People and organisations we work with to provide our services, including insurers, reinsurers, coverholders, brokers, intermediaries, introducers, affinity partners, service providers and their representatives or staff.
- **Enquirers, Complainants and Users of Digital Services**
  People who contact us for any reason, including enquiries, feedback, or complaints, and people who use our websites, online platforms or other digital services.
- **Individuals involved in Legal or Regulatory Matters**
  People connected with legal or regulatory matters, such as legal proceedings, regulatory requirements, audits, or professional advice (for example, regulators, auditors, and legal or other professional advisers).

The way we use personal data may vary depending on your relationship with us. For example:

- If you are a policyholder or insured individual, we primarily use your data to provide insurance services.
- If you are a business contact or partner, we use your data to manage business relationships and support business development.

We are committed to being transparent about how we use personal data, in line with applicable data protection laws.

2. WHO WE ARE

Bspoke Underwriting Ltd

ICO Registration Number: **Z7739575**

Brookfield Court, Selby Road, Leeds, LS25 1NB

Email: dataprotection@bspokeunderwriting.co.uk

We act as a **data controller**, which means we decide how and why your personal data is used.

We operate as a **Managing General Underwriter (MGU).** This means we design, manage, and administer insurance products and services on behalf of insurers, under delegated authority agreements.

In most cases, we receive personal data through brokers, intermediaries, coverholders, claims handlers and other partners involved in the distribution and administration of insurance products, rather than directly from individuals.

However, in some circumstances, we may communicate directly with individuals, for example to manage a complaint, respond to a data protection request, support claims activities, or meet legal or regulatory obligations.

Other Organisations Involved

Other organisations involved in providing your insurance may also use your personal data. These include:

- Insurers who underwrite your policy.
- Brokers, agents, intermediaries and coverholders who arrange or manage your insurance.
- Claims handlers and service providers who support policy administration and claims handling.
- Third-party administrators acting on behalf of insurers or Bspoke Underwriting Ltd.

These organisations may act as **independent data controllers** or, in some cases, as **data processors**. Each organisation will explain how it uses your personal data in its own privacy notice.

You may interact with different organisations at various stages of your insurance journey.

3. HOW WE USE YOUR PERSONAL DATA

We use personal data for the following purposes:

- **To provide, administer and manage insurance products and services**
  This includes arranging, underwriting, pricing, renewing and administering insurance policies throughout their lifecycle, managing claims, and maintaining our contractual relationships.
- **To assess risk and prevent fraud and financial crime**
  This includes underwriting activities, risk assessment, fraud prevention, sanctions screening, identity verification, and where appropriate, credit and anti-financial crime checks.
- **To comply with legal and regulatory obligations**
  This includes complying with applicable laws, regulations and Financial Conduct Authority (FCA) requirements, responding to regulatory requests, and establishing, exercising or defending legal rights.

- **To improve our products, services and operations**
  This includes analysis, testing, service enhancement, quality assurance, performance monitoring and the development of new products and services.
- **To handle enquiries, complaints and communications**
  This includes responding to enquiries, investigating complaints, providing service communications and dealing with requests relating to our services.
- **To manage business relationships and opportunities**
  This includes managing relationships with insurers, brokers, coverholders, service providers and other business partners, and supporting business development activities.

Marketing and Business Communications

Where permitted by law, we may use personal data relating to business contacts and partners to provide information about products, services or business opportunities, events or other matters that may be relevant to their professional role or relationship with us.

We will only send electronic marketing communications where permitted by applicable laws, including the Privacy and Electronic Communications Regulations (PECR), and where required we will obtain your consent.

You can opt out of receiving marketing communications at any time by:

- Using the unsubscribe link included in our communications; or
- Contacting us using the details provided in this notice.

Opting out of marketing communications will not affect service-related communications that are necessary for the administration of our business relationship or the provision of insurance services.

Lawful bases for processing

We process personal data in line with data protection laws and rely on one or more of the following lawful bases:

- **Contract**
  Where processing is necessary to enter into, administer or perform an insurance contract, or to take steps connected with the provision of insurance services.
- **Legal Obligation**
  Where processing is necessary to comply with applicable legal or regulatory requirements.
- **Legitimate Interests**
  Where processing is necessary for our business interests, such as managing policies, handling claims, preventing fraud, and improving our services, provided these interests are not overridden by your rights and freedoms. Our legitimate interests include operating and improving our insurance services, managing risk, maintaining business relationships, and preventing fraud and financial crime.
- **Consent**
  Where required by law, we may rely on your consent to process personal data. This may apply in certain circumstances involving special category personal data.

Different lawful bases may apply depending on the nature of the personal data and the purpose of the processing.

Where we rely on legitimate interests, we ensure appropriate safeguards are in place and carefully consider the impact on your rights and freedoms. You have the right to object to this processing in certain circumstances.

You can request further information about our use of legitimate interests by contacting us.

4. WHAT INFORMATION WE COLLECT ABOUT YOU

We collect personal data to provide and manage insurance services, including administering policies, handling claims, and meeting our legal and regulatory obligations.

Data Minimisation

We only collect and process personal data that is necessary, relevant, and limited to what is required for the purposes described in this notice.

Where Your Personal Data Comes From

In most cases, we do not collect personal data directly from individuals. Instead, we receive personal data from brokers, intermediaries, coverholders, claims administrators, insurers or other organisations involved in arranging, administering, or supporting insurance products and services.

We take reasonable steps to ensure these organisations collect and share personal data lawfully. Once we receive your data, we ensure it is handled in accordance with applicable data protection laws.

We will take reasonable steps to provide this privacy information to you when your personal data is first shared with us, or as soon as reasonably practicable afterwards.

Information provided by You or on Your Behalf

Personal data may be provided directly by you, or by someone acting on your behalf, such as a broker, intermediary, coverholder, employer, policyholder or authorised representative.

The personal data we receive may include:

- Contact details, such as your name, address, email address and telephone number
- Personal details, such as your date of birth, employment information and personal circumstances
- Policy and claims information, including details of insurance cover, insured risks and claims history
- Details of incidents, losses or claims
- Information about your relationship to a policyholder, insured individual or insured entity
- Information relating to other individuals named on or connected to a policy
- Financial information, where relevant, such as payment details
- Health or medical information, where relevant to a policy or claim.

Where you engage with us in a business capacity, we may also process:

- Your name and job title
- Organisation details
- Business contact details.

Sources of Data

We may receive personal data from a range of sources involved in the provision, administration or support of insurance products and services, including:

- Brokers, intermediaries and coverholders
- Insurers and reinsurers
- Claims handlers, loss adjusters, and other experts
- Employers or policyholders, particularly in relation to commercial insurance
- Fraud prevention agencies, such as the Claims and Underwriting Exchange (CUE) and the Insurance Fraud Bureau (IFB)
- Regulators, government bodies and law enforcement agencies
- Publicly available sources, including websites, public registers and social media, where appropriate
- Digital systems including quotation platforms, customer portals and other online services.

Where personal data relates to a business, it may be provided by an employer or another representative acting on behalf of that organisation.

We may also receive personal data about individuals connected to a policy or claim, including insured persons, beneficiaries, dependants, witnesses, claimants and other third parties, even where they do not interact with us directly.

We take reasonable steps to ensure that personal data is collected and shared lawfully. Once received, we process and protect personal data in accordance with applicable data protection laws. Where required, we will take reasonable steps to provide this privacy information when personal data is first shared with us, or as soon as reasonably practicable afterwards.

Website and Device Data

When you use our website or online services, we may automatically collect certain technical information, including:

- Cookie and usage data
- Device and browser information.

We use this information to:

- Improve our services and user experience
- Maintain the security of our systems
- Prevent fraud and misuse.
- Further details are available in our Cookie Policy.

5. SPECIAL CATEGORY AND SENSITIVE DATA

We may process more sensitive types of personal data where this is necessary for the provision of insurance services. This may include:

- Health or medical information
- Criminal offence data, allegations of fraud, or information relating to fraud prevention and detection

- Information about children, where relevant to a policy or claim.

We do not knowingly collect information about children unless it is necessary in connection with an insurance policy, claim or legal obligation.

In commercial settings, this type of data may arise, for example in:

- Employers’ liability claims
- Personal injury claims.

We only process this type of data where it is necessary, proportionate and permitted by law.

Legal Conditions for Processing Sensitive Data

Where we process special category data or criminal offence data, we rely on one or more of the following legal conditions:

- **Substantial Public Interest (Article 9(2)(g) UK GDPR)**
  Together with Schedule 1 of the Data Protection Act 2018 (including for insurance purposes such as underwriting, claims handling, and fraud prevention).
- **Legal Claims (Article 9(2)(f) UK GDPR)**
  Where processing is necessary to establish, exercise, or defend legal claims.
- **Legal Obligations**
  Where processing is necessary to comply with applicable laws or regulatory requirements.
- **Prevention and Detection of Fraud and Financial Crime**
  As part of the substantial public interest conditions under the Data Protection Act 2018.

We put appropriate technical and organisational safeguards in place to protect sensitive personal data and ensure it is handled securely and in line with data protection laws.

6. SUPPORTING VULNERABLE INDIVIDUALS

We recognise that some individuals may need additional support when interacting with us or organisations acting on our behalf. This could include:

- Individual customers
- Employees of a business
- Claimants involved in an incident.

We are committed to delivering fair outcomes in line with our regulatory obligations.

How We Provide Support

Where appropriate, we may ask for information that helps us understand whether you have accessibility requirements, specific communication needs, or other personal circumstances that may require additional support.

We will only collect and use information relating to vulnerability where this is necessary, proportionate and permitted by law. In some circumstances we may rely on your consent. In others, we may rely on our legal or regulatory obligations, including requirements to support vulnerable customers and deliver fair customer outcomes.

Where appropriate, we may use this information to:

- Adjust how we communicate with you
- Provide additional support during your interactions with us or our service providers
- Take steps to ensure our products and services remain accessible and appropriate to your needs
- Help us meet our legal and regulatory obligations and deliver fair customer outcomes.

We only use this information for the purposes of providing appropriate support and ensuring we treat individuals fairly.

Your Choice

Where we rely on your consent, you may withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before consent was withdrawn.

7. USE OF ARTIFICIAL INTELLIGENCE (AI) AND AUTOMATED PROCESSING

Use of Artificial Intelligence

We, and the service providers we work with (including claims handlers and other suppliers), may use artificial intelligence (AI) and similar technologies to support the delivery of our services. This may include:

- Reviewing claims information and supporting documentation
- Identifying potential fraud, anomalies, inconsistencies, or risks
- Analysing customer interactions and service trends
- Supporting quality assurance, monitoring and oversight activities
- Improving the efficiency, accuracy and consistency of our processes

AI is used to support human decision-making and operational processes. We maintain appropriate oversight and controls to help ensure that the use of AI is fair, proportionate and consistent with applicable legal and regulatory requirements.

Automated Decision-Making and Profiling

We may use automated processing, including profiling, to support activities such as:

- Assessing insurance risk
- Determining pricing
- Detecting fraud and financial crime
- Supporting claims assessment and administration.

We do not routinely make decisions based solely on automated processing that have a legal or similarly significant effect on individuals. Where such processing is used and permitted by law, appropriate safeguards will be in place. These safeguards may include the right to:

- Request human review of a decision
- Express your point of view
- Challenge the outcome of a decision.

8. SHARING YOUR PERSONAL DATA

We may share your personal data with a range of organisations to enable us to provide and manage our insurance services. These may include:

- Insurers and reinsurers who underwrite or support your policy
- Brokers, intermediaries and coverholders involved in arranging or managing your insurance
- Claims handlers and service providers who support policy administration and claims handling
- Loss adjusters, investigators, and other specialists involved in assessing and managing claims
- Fraud prevention agencies and industry databases (such as the Insurance Fraud Bureau (IFB) and the Claims and Underwriting Exchange (CUE))
- Employers Liability Tracing Office (ELTO) (where applicable)
- Regulators, law enforcement bodies, and other authorities, where required or permitted by law
- Credit reference agencies (where relevant)
- Third-party administrators and delegated service providers operating on behalf of insurers or Bspoke Underwriting Ltd.
- Professional advisers, including solicitors, auditors and consultants where necessary for legal, regulatory or business purposes.

Some claims handling and administrative activities may be carried out by specialist providers acting on our behalf. In these cases, we remain responsible for ensuring that your personal data is processed in line with applicable data protection laws.

Where organisations process personal data on our behalf, we ensure that appropriate contractual arrangements are in place to protect your personal data.

All organisations we share personal data with are required to process it lawfully, fairly, and securely, and only for appropriate and specified purposes.

9. INTERNATIONAL TRANSFERS

Your personal data is not usually transferred outside the United Kingdom (UK) or European Economic Area (EEA).

However, in some circumstances, your personal data may be transferred to, or accessed from, countries outside the UK or EEA (for example, where our service providers, insurers, or partners operate internationally).

Where this happens, we ensure appropriate safeguards are in place to protect your personal data, in line with data protection laws.

These may include:

- International Data Transfer Agreements (IDTAs) or Standard Contractual Clauses (SCCs)
- Transfers to countries recognised by the UK government as providing an adequate level of protection
- Carrying out transfer risk assessments, where required
- Implementing additional technical and organisational measures, where necessary.

We ensure that your personal data is protected to a standard equivalent to UK data protection requirements.

10. DATA RETENTION

We retain personal data only for as long as necessary for purposes for which it was collected.

Retention periods vary depending on the nature of the policy, claim and applicable legal or regulatory requirements.

In most cases, personal data relating to insurance policies and claims will be retained for at least 7 years after the end of the relevant relationship, claim, or policy. However, longer retention periods may apply depending on the nature of the policy or claim, or where required by law, regulation or contractual obligations.

This retention period reflects:

- Applicable legal limitation periods
- Regulatory and compliance requirements
- Contractual obligations
- The need to establish, exercise or defend legal claims.

In some circumstances, we may retain personal data for longer where this is required or permitted by law, necessary to meet contractual obligations, or justified by the nature of the policy or claim (for example, long-tail liability claims).

When personal data is no longer required, it is securely deleted or anonymised in line with our data retention and security policies.

Anonymised Data

We may retain information in an anonymised form (so that it can no longer be linked to an identifiable individual) for statistical, analytical purposes.

11. DATA SECURITY

We take the security of your personal data seriously and implement appropriate technical and organisational measures to protect it from unauthorised access, loss, misuse, or disclosure.

These measures include:

- Access controls to ensure that personal data is only accessible to authorised individuals
- Monitoring and detection systems to identify and respond to potential security threats
- Technical and organisational safeguards, such as encryption, secure systems, and staff training.

We regularly review and update our security measures to ensure they remain effective and appropriate for the type of personal data we process.

12. YOUR RIGHTS

Under data protection laws, you have a number of rights in relation to your personal data. These include the right to:

- **Access** your personal data and receive a copy of the information we hold about you
- **Request correction** of inaccurate or incomplete personal data

- **Request deletion** of your personal data, where applicable (sometimes called the "right to be forgotten")
- **Restrict or object** to how we process your personal data in certain circumstances
- **Request the transfer** of your personal data to you or another organisation, where applicable (data portability)
- **Withdraw your consent** at any time, where we rely on consent to process your personal data.

You also have the right to object to processing based on our legitimate interests, in certain circumstances.

Where decisions are made using solely automated processing, you may have additional rights under data protection law.

You can find more information about your rights on the Information Commissioner's Office (ICO) website: https://ico.org.uk

To exercise any of these rights, please contact us using the details set out in Section 13.

13. HOW TO CONTACT US, EXERCISE YOUR RIGHTS OR RAISE A PRIVACY CONCERN

Questions about This Notice

If you have any questions about this notice or how we use your personal data, please contact us. We will be happy to provide further information.

If you have any concerns about how we use your personal data, please contact us first:

Email: dataprotection@bspokeunderwriting.co.uk

If you wish to make a complaint about how we have handled your personal data, you may do so by contacting us using the details above. You do not need to refer to specific legislation or use any form of words. We will investigate your concerns and keep you informed of our progress.

What We Will Do

We will:

- Acknowledge receipt of your complaint
- Investigate your concerns thoroughly
- Aim to provide the outcome of our investigation promptly, and where possible, within 30 days. If additional time is required, we will keep you informed of progress and expected timescales.

If you raise a complaint with another organisation involved in your insurance (such as a broker, coverholder, or claims provider), it may be shared with us where appropriate so that we can investigate and respond.

Where your complaint involves another organisation, we may need to share relevant information with them to investigate your concerns.

If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office,

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

www.ico.org.uk

14. UPDATES TO THIS PRIVACY NOTICE

We may update this privacy notice from time to time to reflect changes in our practices, legal requirements, or regulatory guidance.

The most up-to-date version will always be available on our website. Where appropriate, we will take reasonable steps to inform you of any significant changes.