Privacy Policy

Last updated: 5th August 2025

https://gillaminsurance.co.uk ('Website') is provided by Gillam Insurance Brokers Limited t/a Gillam Insurance brokers ('we'/'us'/'our'). I). In doing so, we may be in a position to receive and process personal information relating to you. As the controller of this information, we're providing this Privacy Policy to explain our approach to personal information gathered through our website and through providing our services to you. This Policy forms part of our Terms and Conditions, which govern the use of this Website.

We intend only to process personal information fairly and transparently as required by data protection law including the UK General Data Protection Regulation (UK GDPR). In particular, before obtaining information from you (including through use of cookies) we intend to alert you to this Policy, let you know how we intend to process the information (including through use of cookies) and that we'll only process the information as permitted by law. The UK GDPR also defines certain 'special categories' of personal information that's considered more sensitive. These categories require a higher level of protection, as explained below.

Of course, you may browse parts of this Website without providing any information about yourself and without accepting cookies. In that case, it's unlikely we'll possess and process any information relating to you.

We'll start this Policy by setting out the conditions we must satisfy before processing your data. However, you may wish to start with the table at clause 5, which summarises what we intend to collect, or the table at clause 9.5, which summarises our use of cookies. The Policy also explains some of the security measures we take to protect your personal information, and tells you certain things we will or won't do.

Sometimes, when you take a new service or product from us, or discuss taking a new service or product but decide against it, we might wish to provide you with further information about similar services or products by email or other written electronic communication. In that situation, we'll always give you the opportunity to refuse to receive that further information and you can change your mind at any point (opt-out) by contacting our Data Protection Officer (DPO) as set in clause 1.4. We'll endeavour to remind you of your right to opt-out on each occasion that we provide such information.

1. Identity and contact details

1.1 Registered number: 16171713

1.2 Registered office: 36 The Roystons, East Preston, West Sussex, BN16 2TS

1.3 Email address: glen@gillaminsurance.co.uk

1.4 Our Data Protection Officer (DPO) would welcome communication from you regarding any matter relating to data protection, and can be contacted by email at glen@gillaminsurance.co.uk.

2. **When we're allowed to collect information from you**

We will only collect personal information relating to you if one of the following conditions has been satisfied:

2.1 You have clearly told us that you are content for us to collect that information for the particular purpose or purposes that we will have specified.

2.2 The processing is necessary for the performance of a contract that we have with you.

2.3 The processing is necessary so that we can comply with the law.

2.4 The processing is necessary to protect someone's life.

2.5 The processing is necessary for the performance of a task that's in the public interest.

2.6 The processing is necessary for our or another's legitimate interests - but in this case, we'll balance those interests against your interests.

3. **How to consent**

3.1 If we need your consent to collect and use certain information, we'll provide you with the opportunity to tell us that you're happy to provide that information at the point of collecting it.

3.2 If at any point in time you change your mind and decide that you want to withdraw your consent, please let us know and we'll endeavour to stop processing your information in the specified manner, or we'll delete your data if there is no continuing reason for possessing it.

3.3 If you don't consent to a particular bit of processing, we'll endeavour to ensure that the Website and our service continue to operate without the need for that information.

4. **Sensitive information**

4.1 Certain information we collect may be considered to be in special categories of personal information. In particular, it may:

a. reveal political opinions

b. reveal racial or ethnic origins

c. reveal religious or philosophical opinions

d. reveal trade union membership

e. relate to biometric data

f. relate to genetic data

g. relate to your health

h. relate to your sex life or sexual orientation

4.2 If we do collect such information as specified in clause 4.1, we'll also ensure that one of the additional reasons for processing outlined in the UK GDPR applies.

4.3 It's likely that we'll need to process information relating to criminal convictions or offences or related security measures. If we do so, we'll make sure we comply with the extra conditions set out in the UK GDPR. This will normally be where we're legally required to

process such data, where you've consented or where it's clear that you've made the information public.

5. **Information we expect to collect from you**

5.1 We envisage collecting the following types of information from you:

Information type	Purpose and related details	Justification
• Name & Address • Telephone numbers • Email address • Bank Details • National Insurance Number / Passport details • Details of risks to be insured • Details of previous insurance claims, policies cancelled, missed payments • Information from Credit Reference Agencies	• We collect this information so we can find a suitable insurance contract and related Premium financing for you, and to provide you with an ongoing service in respect of any policies arranged through us • We also collect this information to fulfil our regulatory obligations to check the identity of any parties we transact with. • We may also use this information to contact you regarding products / services we believe you may be interested in.	• It's necessary for the performance of a contract with you • To meet our legal obligations as a regulated firm • This is necessary to meet our legitimate interests
• Health Data • Criminal Records/offences	• We use this information to help ensure you are eligible for any policy we look to arrange for you. • We also use Health Data to understand if we need to make any reasonable adjustments to our processes to make it easy for you to interact with us.	• We will ask for your explicit consent when processing such data

5.2 We may collect personal information about you from a number of sources, including the following:

a. From you when you agree to take a service or product from us, in which case this may include your contact details, date of birth, how you will pay for the product or service and your bank details.

b. From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.

c. As you interact with this Website, we may automatically collect technical information about your equipment, browsing actions and patterns (such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Website). We may collect this personal information by using cookies and other similar technologies.

d. From documents that are available to the public, such as the electoral register.

e. From third parties to whom you have provided information with your consent to pass it on to other organisations or persons - when we receive such information we will let you know as soon as is reasonably practicable.

5.3 If you refuse to provide information requested, then if that information is necessary for a service we provide to you we may need to stop providing that service.

5.4 If at any point you think we've invited you to provide information without explaining why, feel free to object and ask for our reasons.

6. Using your personal information

6.1 Data protection, privacy and security are important to us, and we shall only use your personal information for specified purposes and shall not keep such personal information longer than is necessary to fulfil these purposes. The following are examples of such purposes. We have also indicated below which UK GDPR justification applies, however it will depend on the circumstances of each case.

a. To help us to identify you when you contact us. This will normally be necessary for the performance of our contract.

b. To help us to identify accounts, services and/or products which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the personal information you've provided and/or any information we hold about you and personal information from third party agencies (including credit reference agencies). We will only use your information for this purpose if you agree to it.

c. To help us to administer and to contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future. This will often be necessary, but sometimes the improvements will not be necessary in which case we will ask whether you agree.

d. To allow us to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information. This will sometimes require that you consent, but will sometimes be exempt as market research.

e. To help to prevent and detect fraud or loss. This will only be done in certain circumstances when we consider it necessary or the law requires it.

f. To allow us to contact you by written electronic means (such as email, text or multimedia messages) about products and services offered by us where:

i. these products are similar to those you have already purchased from us,

ii. you were given the opportunity to opt out of being contacted by us at the time your personal information was originally collected by us and at the time of our subsequent communications with you, and

iii. you have not opted out of us contacting you.

g. To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about products and services offered by us and selected partners where you have expressly consented to us doing so.

h. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.

i. Before doing that, we will always tell you of our intentions and of the specific purpose in making the recording. Sometimes such recordings will be necessary to comply with the law. Alternatively, sometimes the recording will be necessary for our legitimate interest, but in that case we'll only record the call if our interest outweighs yours. This will depend on all the circumstances, in particular the importance of the information and whether we can obtain the information another way that's less intrusive.

ii. If we think the recording would be useful for us but that it's not necessary for our legitimate interest, we'll ask whether you consent to the recording, and will provide an option for you to tell us that you consent. In those situations, if you don't consent, the call will either automatically end or will not be recorded.

i. When it's required by law, we'll check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we intend to record this.

6.2 We will not disclose your personal information to any third party except in accordance with this Policy, and then only in one of the following circumstances:

a. They will be processing the data on our behalf as a data processor (where we'll be the data controller). In that situation, we'll always have a contract with the data processor as set out in the UK GDPR. This contract provides significant restrictions as to how the data processor operates so that you can be confident your data is protected to the same degree as provided in this Policy.

b. Sometimes it might be necessary to share data with another data controller. Before doing that we'll always tell you. Note that if we receive information about you from a third party, then as soon as reasonably practicable afterwards we'll let you know; that's required by the UK GDPR.

c. Alternatively, sometimes we might consider it to be in your interest to send your information to a third party. If that's the case, we'll always ask whether you agree before sending.

6.3 Where you give us personal information on behalf of someone else, you confirm that you have provided them with the information set out in this Policy and that they have not objected to such use of their personal information.

6.4 In connection with any transaction which we enter into with you:

a. We may carry out one or more credit checks.

b. We and they may keep a record of the search. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records may also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.

c. If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We, and other credit and insurance organisations, may also use technology to detect and prevent fraud.

d. If you need details of those credit agencies from which we obtain and with which we record information about you, please write to our Data Protection Manager as detailed in clause 1.4.

e. We may need to transmit the payment and delivery information provided by you during the order process for the purpose of obtaining authorisation from your bank.

6.5 We may allow other people and organisations to use personal information we hold about you in the following circumstances:

a. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case personal information held by us, about our customers, will be one of the transferred assets.

b. If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.

c. We may employ companies and individuals to perform functions on our behalf and we may disclose your personal information to these parties for the purposes set out above. Third parties we may share your personal information with include:

- Our Principal, Movo Partnership Ltd
- Insurers and finance houses, to try and source a suitable insurance policy and related premium financing
- Third parties who may assist in the handling/resolution of any insurance claims you make
- IT Service Providers / software providers, where we use their software in the course of our operations

- External consultants/agencies such as solicitors, accountants, IT/Compliance Consultants, debt collection agencies, marketing agencies
- External agencies providing additional human resource e.g. contractors, temporary workers etc
- Any parent company, subsidiaries, joint ventures, other entities under a common control or third-party acquirers.
- 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
- Her Majesty's Revenue and Customs, Financial Conduct Authority, Financial Ombudsman Service, Information Commissioners Office, or other regulatory body as the need arises.
- 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
- Other third parties with your consent or direction to do so

From time to time, these other people and organisations to whom we may pass your personal information may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Policy and the UK GDPR. We require all third-party service providers processing your personal information for us (as our data processor) to respect the security of your personal data and to treat it in accordance with the law. We do not allow them to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. **Protecting information**

7.1 We have strict security measures to protect personal information.

7.2 We work to protect the security of your information during transmission by using appropriate technology to encrypt information you input.

7.3 We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

7.4 It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

8. **The internet**

8.1 If you communicate with us using the internet, we may occasionally email you about our services and products. When you first give us personal information through the Website, we will normally give you the opportunity to say whether you would prefer that we don't contact you by email for that purpose. You can also always send us an email (at the address set out below) at any time if you change your mind.

8.2 Please remember that communications over the internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

9. **Cookies and other internet tracking technology**

9.1 When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer, which is sent back to us at a later time. These are called 'cookies'. These cookies are listed in the table at clause 9.5. Some websites don't use cookies but use related technology for gaining information about website users such as JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. Multiple cookies may be found in a single file depending on which browser you use.

9.2 Where applicable, this section of the Policy also relates to that technology but the term 'cookie' is used throughout.

9.3 Some of these cookies are essential to services you've requested from us, whereas others are used to improve services for you, for example through:

a. Letting you navigate between pages efficiently

b. Enabling a service to recognise your computer so you don't have to give the same information during one task

c. Recognising that you have already given a username and password so you don't need to enter it for every web page requested

d. Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast

9.4 To learn more about cookies, you may wish to visit: www.allaboutcookies.org, www.youronlinechoices.eu or www.google.com/policies/technologies/cookies/

9.5 This Website uses, or allows use of, the following cookies:

Cookie name	**Cookie Description**	**Consent needed**
wt_consent	Used for remembering users' consent preferences to be respected on subsequent site visits. It does not collect or store personal in-formation about visitors to the site.	NO

_wpEmoji-SettingsSupports	WordPress sets this cookie when a user interacts with emojis on a WordPress site. It helps determine if the user's browser can display emojis properly.	NO
nevercache-b39818	This cookie is used to prevent certain pages or content from being cached by the website's server. It ensures that users receive the most up-to-date and personalised content during their session, especially when viewing dynamic or user-specific information.	YES

9.6 The distinctions referred to in the above table are as follows:

a. First party versus third party cookies - we set first party cookies ourselves; third party cookies are set by other entities via our Website.

b. Session versus persistent cookies - session cookies only persist for the duration of that visit; persistent cookies last for longer.

c. Categories 1-4 found in the ICC UK Cookie guide, as explained below. Category 1 cookies don't require your consent, though we must still tell you about those cookies. Categories 2-4 do require your specific and informed consent.

Category 1	Strictly necessary	These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided. We include in this category cookies that are used only for electronic communication. (The ICC doesn't refer to these cookies, but the law is the same.)
Category 2	Performance	These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. This information is only used to improve how a website works.
Category 3	Functionality	These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as a live chat session.

Category 4	Targeting and advertising	These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

9.7 As with any other information we may collect from you, we'll work to protect the security of your information during transmission by using appropriate technology to encrypt information you input.

10. **Your legal rights**

10.1 Under certain circumstances, you have rights under data protection laws in relation to your personal information.

10.2 You have the right to:

a. Request access to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

b. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.

c. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we're required to erase your personal information to comply with the law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

d. Object to processing of your personal information where we're relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we're processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

e. Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following situations:

i. if you want us to establish the information's accuracy;

ii. where our use of the information is unlawful but you do not want us to erase it;

iii. where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims; or

iv. you have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

f. Request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

g. Withdraw consent at any time where we're relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

10.3 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

10.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10.5 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Further information

11.1 If you would like any more information or you have any comments about this Policy, or if your wish to exercise any of your legal rights, please write to our Data Protection Officer as detailed in clause 1.4.

11.2 Please note that we may have to amend this Policy on occasion, for example if we change the cookies that we use. If we do that, we will publish the amended version on the Website. In that situation we will endeavour to alert you to the change, but it's also your responsibility to check regularly to determine whether this Policy has changed.

11.3 You can ask us for a copy of this Policy by writing to the above address or by emailing us at glen@gillaminsurance.co.uk. This Policy applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.