Roanoke International Brokers Limited - Privacy Notice

This privacy notice is designed to help you, as a customer of Roanoke International Brokers Limited (RIBL), to understand how we process your personal data.

You are a customer of Roanoke International Brokers Limited and we are a broker that may place your insurance or reinsurance policy with a number of insurance or reinsurance companies.

The insurance lifecycle may involve the sharing of your personal data with other insurance market participants, some of which, you may not have direct contact with. You can find out more information about these companies by contacting the company that you purchased your policy from.

The Data Controller for Roanoke International Brokers Limited is:
Roanoke International Brokers Limited
1 Fen Court
London
EC3M 5BN
Tel: +44 (0) 20 7886 3800
Email: info@roanokebrokers.com
https://www.roanokebrokers.com/

The Data Protection Officer for Roanoke International Brokers Limited is:
The Data Protection Officer Roanoke International Brokers Limited
1 Fen Court London EC3M 5BN
Tel: +44 (0) 20 7886 3800 Email: p0060010183@munichre.com
https://www.roanokebrokers.com/

Please contact the Data Protection Officer if you have questions concerning this Privacy Notice or your Data Subject Rights. These include:

- Subject Access Request: To access your personal data and information around its processing.
- Data Portability: The transfer of your personal data to another Data Controller.
- Erasure: To have your personal data removed or deleted.
- Rectification: To have your personal data corrected if it is inaccurate.
- Restrict Processing: To restrict processing where your personal data is inaccurate or the processing is unlawful.
- To object to processing based on legitimate interest.
- To object to direct marketing (NOTE: we do not do direct marketing).

If you are unhappy with any response or have a complaint. You can raise this with:

The Information Commissioner Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: +44 (0) 303 123 1113

Who your data is shared with

The following are data controllers that we share your personal data with:

- Insurers;
- Reinsurers including Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München;
- Government Agencies;
- Legal advisers;
- Service Providers.

The following are data processors that we disclose your personal data to:

• Third Parties providing services for Banking, Claims Handling, Insurance Administration and IT Services.

Please contact the Data Protection Officer (p0060010183@munichre.com) if you require further information on who your data is shared with.

What information do we collect about you

Personal Data

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Individual Information	Name, address, marital status, date and place of birth, nationality, employer, job title, employment history, family details and their relationship to you.	Insurance companies, Insurance intermediaries or other insurance market participants. Your family. Your employer. Credit reference agencies.	Group companies. Insurers Reinsurers Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists	Setting you up as a client including checks for potential fraud, sanctions, credit and anti- money laundering. Underwriting, evaluating and pricing of the risks to be insured and calculating and validating the appropriate premium for your policy.	Performance of our contract with you.
Policy Information	Information about the quotes and insurance policies you have applied for or taken out.	Insurance companies Insurance intermediaries or other insurance market participants. Your family. Your employer.	Group companies. Insurers Reinsurers Other intermediaries or market participants. Anti-fraud databases.	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you.
Financial Information	Premiums and claims paid on your policies. Bank account or payment card details. Income and other financial information.	Insurance companies Insurance intermediaries or other insurance market participants. Your family. Your employer. Credit reference agencies.	Group companies. Insurers Reinsurers. Other intermediaries or market participants. Credit reference agencies. Anti-fraud databases.	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you.

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Statutory and anti- fraud information	Credit history, credit score, sanctions and information from anti-fraud databases concerning you.	Insurance companies Insurance intermediaries or other insurance market participants. Member of your family. Your employer. Anti-fraud databases, sanctions lists, court judgements and other government agencies.	Group companies. Insurers. Reinsurers. Other intermediaries or market participants. Anti-fraud databases.	Setting you up as a client including checks for possible fraud, sanctions, credit and anti- money laundering. Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you. Compliance with a legal obligation. Processing is necessary for the defence of legal claims.
Claim Information	Information about previous and current claims.	Insurance intermediaries or other insurance market participants. Member of your family. Your employer. Anti-fraud databases, claimants, defendants, witnesses, experts inc. medical experts, loss adjustors, solicitors and claims handlers.	Group companies. Insurers Reinsurers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists.	Managing insurance and reinsurance claims. Defending or prosecuting legal claims. Investigating or prosecuting fraud.	Performance of our contract with you. Compliance with a legal obligation. Processing is necessary for the defence of legal claims.

Special Categories of Personal Data

Categories of data	Type of information processed	Source of the data	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Individual Information	Gender and health information. Medical reports. Criminal records and convictions.	Insurance Companies Insurance intermediaries or other insurance market participants. Member of your family. Your employer.	Group companies. Insurers. Reinsurers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists.	Setting you up or managing you as a client. Evaluating and pricing the risks to be insured and calculating and validating any appropriate premium where there is health or life insurance.	Processing is necessary for an insurance purpose or consent. Processing is necessary for the defence of legal claims.
Statutory and anti- fraud information	Criminal records and convictions. Surveillance reports.	Insurance Companies Insurance intermediaries or other insurance market participants. Member of your family. Your employer. Anti-fraud databases, sanctions lists, court judgements and other government agencies.	Group companies. Insurers. Reinsurers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists.	Setting you up or managing you as a client. Evaluating and pricing the risks to be insured and validating any appropriate premium where there is health or life insurance, including checks for potential fraud, sanctions, anti-money laundering and other statutory checks.	Processing carried out under the control of official authority. Processing is necessary for the defence of legal claims.

Protection of your information

Your privacy is important to us and we follow strict security and organisational procedures in the processing, storage, destruction and disclosure of your information. This is to prevent unauthorised access or loss of your information.

Use of your Consent to process Special Categories of Personal Data

In order to provide insurance, in certain circumstances we may need to process special categories of personal data, such as medical records or criminal convictions.

We follow the lawful basis that your insurer has used in processing and disclosing your special categories of personal data to us. This may be necessary for an insurance purpose or consent. If consent is used, you will not have given your consent directly to us but to the insurer that you purchased your policy from. You may withdraw your consent for us to process your special categories of personal data at any time by contacting the Data Protection Officer (details as above). However, if you withdraw your consent this will impact on our ability to provide or continue to provide insurance for your insurance policy or pay claims.

Call Monitoring and Recording

For quality control purposes and to audit the evaluation process for the underwriting and pricing of the risks to be insured, we may review copies of telephone recording made with the intermediary that you purchased your policy from.

Data Retention

Your personal data will only be kept for as long as it is necessary for the purpose it was collected for.

Category of data	How long we retain your data		
Each new risk that is underwritten	6 years for short term business		
	40 years for long term business		
Any material aggregation of exposure to risk from a single source or of the same kind or to the same potential catastrophe or event	6 years		
Each notified claim including the amounts notified and paid, precautionary notices and any re-opened claims	6 years from date of closure of claim. Unless specific jurisdictional requirements dictate a longer period.		
Claims correspondence	At least 3 years after claims settlement		
Policy and contractual documents and any relevant	6 years for short term business		
representations made to policyholders	40 years for long term business		
Other events or circumstances relevant to determining the risks	6 years for short term business		
and commitments that arise out of contracts of insurance or contracts for insurance	40 years for long term business		

Where the retention period is set by reference to the term of the business, the period commences when there is a reasonable expectation that no further claims would be notified under the relevant policy.

Transfer of Data

We may transfer your personal data outside the UK or EEA where there is not an adequate level of data protection. This will only happen when it is necessary for the insurance contract that you are either requesting or have taken out.

We may transfer your personal data within our Group or to Service Providers outside the UK or EEA. However, we ensure that there is an adequate level of data protection in place and adhered to by these parties.

You can find out the details about any other party we have shared your personal data with by contacting the Data Protection Officer at the address provided at the top of this privacy notice.

Changes to this Roanoke International Brokers Limited - Privacy Notice

If we make changes to this privacy notice that affects how we process your information, we will revise the notice and publish it on our website.