



63 St Mary Axe
London EC3A 8AA
+44 (0) 20 3633 4789
www.iredd.ltd

Intelligent Real Estate Due Diligence Limited (“IREDD”) Data Privacy Notice

IREDD values its customers and is committed to protecting and respecting your privacy. This Data Privacy Notice explains how we process and protect any personal data we collect or receive about you. This Data Privacy Notice applies to personal data provided by our customers, other brokers, claimants and /or third party agents (TPAs). Where we are provided with personal data about other individuals, then the person supplying such personal data should provide this notice to the individuals concerned. Please read this Data Privacy Notice carefully to understand our practices regarding personal data.

Who are IREDD?

Your personal data has either been or will be collected by Intelligent Real Estate Due Diligence Limited. Our contact details are below. We aim to respond to all correspondence within one calendar month.

- By writing to: The Data Protection Officer
Intelligent Real Estate Due Diligence Limited,
63 St Mary Axe, London, EC3A 8AA
- By phone: +44 (0)20 3633 4789
- By email : info@iredd.ltd (marked for the Attention of the Data Protection Officer)

Our Data Protection Officer will handle any questions you may have on the use of your personal data and your rights as a data subject (see also *Your Data Subject Rights below*).

Types of personal data we hold

We capture and process a variety of different types of personal data depending on the nature of the services involved. We seek to comply with principles of "data minimisation". This means we try to ensure that we avoid collecting and/or processing data other than the types and volume of personal data strictly required to achieve the purposes set out in this Data Privacy Notice. The type of personal data that might be captured by us may include but is not limited to:

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Type of Personal Data	Example
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, data and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Official identification details	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number
Financial information	Bank account or payment card details, income or other financial information
Risk details	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to the health, criminal convictions, or other special categories of personal data of the people to be covered.
Policy information	Information about quotes provided and policies you take out
Credit and anti-fraud data	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you
Previous and current claims	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases surveillance reports

Sometimes we may capture special categories of personal data. These are certain types of personal data which require additional privacy protection. The special categories are:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic or biometric data;

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- Health data;
- Sex life or sexual orientation.

Personal data and special category data may be captured to enable us to carry out our role as an insurance intermediary.

Why we use your personal data

We collect your personal data to help us assess our customers' needs for legal indemnity insurance, to advise, arrange and administer insurance contracts and to enable us to make a personal recommendation for our customers and /or to place insurance business on our customers behalf with an insurer or by using a third party intermediary (e.g., an underwriting agent or a Coverholder for a Lloyd's syndicate etc.).

Specifically:

- a. Advising on, arranging and assessing your needs for legal indemnity insurance, including:**
 - Performing credit or money laundering checks
 - Understanding your insurance requirements to secure an offer of insurance that matches your needs and circumstances
 - Gaining a reasonable understanding of the nature of the risk required to be covered by any policy
 - Assessing market competitiveness and acceptability of pricing
- b. Administering your policy, including:**
 - Managing any changes to your policy or legal indemnity insurance requirements
 - Providing and improving client services as appropriate
 - Maintaining contact with you, for issues relating to your policy and general customer contact
- c. Further reasons, including:**
 - To allow us to perform the essential practice and process of acting as an insurance intermediary and broker
 - Analysing our clients and the products they select
 - To ensure we comply with any legal or regulatory obligations

Our legal bases for processing your personal data

We process personal data where necessary in order to:

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- Engage with our customers or when our customers or someone acting on their behalf requests our assistance in connection with assessing relevant needs for legal indemnity insurance and are considering entering into a contract;
- Satisfy our obligations under a contract with a client or customer;
- Comply with any legal obligations upon us;
- Process data as may be required in the public interest, such as detecting and preventing fraud;
- Pursue our legitimate interests in providing clients and customers with insurance intermediary services.

We may need to process your special category data when we:

- assess relevant needs for legal indemnity insurance prior to our customer or client entering into a contract of insurance policy or in connection with any amendment or administration of a policy;
- Process data for reasons of substantial public interest.

Who we share personal data with?

To allow us to meet our obligations and effectively provide our services to you, it may be necessary to pass your personal data onto external parties. These external parties may include:

- Insurers,
- Third party intermediaries such as underwriting agents or coverholders for any insurer or third parties acting for any Lloyd's syndicate etc.
- Credit reference agencies
- Anti-fraud databases
- Banks
- Claims handlers
- Lawyers and Solicitors
- External parties involved in any claim under a policy
- The police and law enforcement and third party investigators
- Other parties (under court order or to prevent and detect fraud)
- The Financial Conduct Authority, the Information Commissioner's Office and other regulators as required by law
- Our suppliers and sub-contractors for the performance of any contract we have with them

Your data will be shared securely, and only when absolutely necessary. It will never be sold on to external parties or organisations for marketing purposes.

Ongoing storage and use of your personal data

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We will not keep personal data for longer than necessary for the purpose for which it is processed. It will be retained in accordance with our Data Retention Standard. Laws or regulations may require us to keep records for specific periods of time. We may also need to keep records in order to administer the insurance relationship, to fulfil our contractual or statutory obligations or to resolve queries or disputes which may arise.

We will store your personal data based upon the following criteria:

- Whether the personal data is actively required for the purposes stated in this Data Privacy Notice
- Whether there is a legal or regulatory reason to continue to retain the personal data

Your data subject rights

Under Data Protection regulations you have the right to:

- Obtain a copy of your personal data held by IREDD
- Have any incorrect personal data updated
- Request the erasure of any of your personal data
- Restrict the use of your personal data
- Object to the use of your personal data
- Request the personal data you provided to IREDD to be moved to another organisation

If you wish to exercise any of these rights, please write to the below address stating your request and contact details. In order for IREDD to respond to your requests effectively and efficiently, please provide any further information you feel is necessary. Please write to:

**The Data Protection Officer
Intelligent Real Estate Due Diligence Limited,
63 St Mary Axe,
London,
EC3A 8AA**

If you contact us regarding the exercise of these rights, we will seek to implement your wishes. In some cases (particularly where the request relates to the restriction of use of personal data or the objecting to the use of personal data) there may be reasons why we are not able to fully comply with your request, particularly where we are required to keep and use that data to comply with legal or regulatory requirements

Complaints

IREDD is committed to providing high quality products and services. If you feel that we have not met your expectations, we'd like to know so we can put things right for you. You can submit a complaint through our website [here](#) or via post at the below address.

**Complaints
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We would expect that any complaint can best be dealt with by contacting us in the first instance, and we will take complaints made to us seriously. However, if you wish to complain about our use of your personal data, and do not wish to contact us first, you also have the right to complain directly to the supervisory authority. Full details on this can be found on the following website: <https://ico.org.uk/>

Where we might collect your personal data from

We might collect your personal data from various sources including:

- You;
- Your family members, employer or representative;
- Other insurance market participants such as, authorised agents, service providers, other insurance intermediaries, other brokers and legal advisers;
- Credit reference agencies;
- Anti-fraud databases, sanctions lists, court judgements and other databases;
- Government agencies such as HMLR, DVLA and HMRC;
- Open electoral register and or other publicly available registers; or
- In the event of a claim, third parties including any other party to the claim (such as a claimant/defendant), witnesses, experts (including medical experts), loss adjustors, lawyers and solicitors, and third party claims handlers.

Which of the above sources apply will depend on your particular circumstances.

Data Privacy Notice – V1 – February 2019

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