

PRIVACY NOTICE

This privacy notice relates to personal information that identifies you as a natural person (whether you are an actual or potential Member, an individual who browses our website or an individual outside our organisation with whom we interact). We refer to this information throughout this privacy notice as personal data or personal information and further detail of what this includes are set out in this privacy notice below.

The privacy and security of your information is important to us. This Privacy or Fair Processing Notice explains who we are, the types of information we hold, how we use it, who we share it with and how long we keep it. It also informs you of certain rights you have regarding your personal data under current data protection law. We will update this notice as required and at least annually (every December). Therefore, we suggest you revisit this notice every December to keep yourself informed. The terms used in this Fair Processing Notice are based on the Information Commissioner's Office. You can find out more about the ICO here: <https://ico.org.uk/>.

Who we are and how to contact us

We are:

Bravo Networks, a trading style of The Broker Network Limited (registration number: 02906084)
Compass Broker Holdings (registration number 10118175)
Compass Broker Networks Limited (registration number 10118181)
Compass Broker Services Limited (registration number 10118186)

whose registered office is at Hexagon House, Grimbald Crag Close, St James Business Park, Knaresborough, North Yorkshire, HG5 8PJ, referred to as we, us or our in this privacy notice. The Broker Network Ltd is the Data Controller of the information you provide us and is registered with the Information Commissioner's Office (ref Z5065007) for the products and services we provide to you. As a controller we use (or process) the personal data we hold about you in accordance with this privacy notice.

Any enquiries relating to data protection should be sent to:
The Ardonagh Advisory Data Protection Officer, 2nd Floor, The Octagon, Colchester, CO1 1TG. Please advise us of as much detail as possible to comply with your request.

For further information about The Ardonagh Group of companies please visit <http://www.ardonagh.com/about-us/business-portfolio>. Please note that different parts of the group may have different data protection officers.

The personal information we collect and hold about you and where we obtain this from

The personal data that we collect about you may include the following information:

- Personal data you provide to us in person, via our website or by telephone

- Personal data you provide when you enquire about our business or activities of Bravo Networks companies
- General information about you, such as your name, address and contact details
- Personal data you provide if you subscribe to any of our mailing or newsletter services
- Information about your use of our website such as your IP address, which is a unique number identifying your computer, including personal data gathered using cookies
- Personal information shared with us by our members as part of the services we provide to them

We also collect information from publicly available sources and third-party databases made available to the insurance industry as well as any other third-party databases where your personal data may be held, provided such third parties have lawful bases on which to share such personal data with us and we have a legitimate interest to process that personal data.

How we use your personal data and the lawful basis for doing so

We may rely on one or more of the following legal bases when processing your personal data for the following purposes:

Purposes for which we process your personal data	The basis on which we can do this (this is what the law allows)
To administer any account with a group firm, including financial transactions for insurance broking	The processing is necessary in connection with any contract that you may enter into with us
To assist in the prevention and reduction of fraud and other financial crime	The processing is necessary for us to comply with the law and our legal requirements
In the interests of security and to improve our service, telephone calls you make to us may be monitored and/or recorded. We may also need to request personal information and ask security questions to satisfy ourselves that you are who you say you are.	The processing is necessary to pursue our legitimate interest in the management and operation of our business
To let you know about similar products and services that may be of interest to you	The processing is necessary to pursue our legitimate interest in operating our business
To make automated decisions, automated profiling, and fraud detection	The processing is necessary in connection with some contracts that you may enter into with us
Develop new products and services	Legitimate interests
Undertake statistical and risk analysis	This will be on a legitimate interested basis unless we

	conduct specific work for you on a contractual basis
Marketing and self-promotional activity	Legitimate interests
Support monitoring and quality management of our employees and processes	Processing in connection with a contract

We do not collect or process personal data on the basis of consent.

We may from time to time process your personal data to let you know about similar products and services that may be of interest to you. This is because we value your custom, and we pride ourselves in offering professional and tailored advice which meets your specific needs. This includes keeping you informed on the latest insurance and industry information and details of any offers or promotions relating to the services we provide to you.

Our lawful basis for processing your personal data in this way is as is necessary to pursue the legitimate interests of our business, unless we have otherwise obtained your consent to do so. We may contact you by post, telephone, or e-mail. You will be given the option to stop receiving any communications from us in this regard at any time however please note that this will *not* affect us contacting you about the servicing of products that you have specifically requested from us.

Special categories of data and criminal convictions

Where it is necessary to do so, we may also need to collect special categories of data about our members' clients such as information about their health, personal data revealing racial or ethnic origin or religious beliefs. We may also collect information on criminal convictions which we may share with third parties. The lawful basis on which we can do this is the processing is necessary for reasons of substantial public interest relating to insurance purposes.

Insurance purposes mean (a) advising on, arranging, underwriting, or administering an insurance contract (b) administering a claim under an insurance contract or (c) exercising a right or complying with an obligation, arising in connection with an insurance contract, including a right or obligation arising under an enactment or a rule of law.

Who we pass your personal data to

We may need to pass your personal data to other companies which may include:

- Other companies within the Ardonagh group of companies who provide us with services. We will never share information with any business unit who undertake retail insurance broking within our Group.
- Third party service providers that we use for the purpose of facilitating access to insurance products for our members
- Firms that provide administration and processing services to us or on our behalf under contract in order to complete activities such as IT systems and administrative services and other activities set out in this privacy notice, as well as support activities such as finance and auditing services
- Organisations that have a specific role laid out in law, such as statutory bodies, regulatory authorities, and other authorised bodies

- Other organisations where we have a duty to or are permitted to disclose your personal information by law, for example if we received a valid request from the police or other third-party organisation in the interest of preventing and detecting crime
- Fraud prevention agencies and operators of registers available to the insurance industry.
- Another company, if our business or part of it is bought or taken over by that company or as part of preliminary discussions with that company about a possible sale or take over

If we provide information to a third party, we will require it and any of its agents and/or suppliers to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Fair Processing Notice.

The personal information you share with may be transferred to, and stored at, a destination outside of the European Economic Area (“EEA”). It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, the provision of information you have requested.

How Long we keep personal information for

We will not keep your personal information longer than is necessary for the purpose for which it was provided unless we are required by law or have other legitimate reasons to keep it for longer (for example if necessary for any legal proceedings).

We will typically keep information for no more than 6 years after termination or cancellation of a product, contract, or service we provide unless there another legal or business reason to do so.

Your rights

There are a number of rights that you have under data protection law. Commonly exercised rights are:

- Access – You may reasonably request a copy of the information we hold about you. [ICO guidance](#)
- Erasure - Where we have no legitimate reason to continue to hold your information, you have the right to have your data deleted (sometimes known as the right to be forgotten). [ICO guidance](#)
- Correction – you may request correction of the personal information we hold about you to enable any incomplete information to be corrected. [ICO guidance](#)
- We may use automated decision making in processing your personal information for some services and products. You can request a manual review of the accuracy of an automated decision if you are unhappy with it. [ICO guidance](#)
- Provide your personal data in a structured, commonly used, and machine-readable format and to have your personal data transferred to another controller. This right only applies where our processing of your personal data is automated, and the processing took place initially with your consent or for the performance of a contract with you
- Where we rely on your consent to use your personal information, you can withdraw that consent at any time. Where your consent is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you don’t want us to contact you again

More information about your rights can be found on the [ICO website](#).

How we contact you about other products and services

If you have any concerns about our use of your personal information, you can make a complaint to us by emailing advisorydp@ardonagh.com or in writing to The Ardonagh Advisory Data Protection Officer, 2nd Floor, The Octagon, Colchester, CO1 1TG.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Accessing our website and cookies

When you visit one of our websites we may collect information from you, such as your email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit. We use third parties to collate IP addresses to help us understand our Internet traffic data and data regarding your browser type and computer. We may also use web usage information to create statistical data regarding the use of our website. We may then use or disclose that statistical data to others for marketing and strategic development purposes, but no individuals will be identified in such statistical data.

We may use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website, but not on your computer. Pixel tags usually work together with cookies to help us to give you a more tailored service. We also use cookies and pixel tags in our email communication to personalise the email and track whether the email has been opened and whether the recipient has used any website links contained in the email communication. This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found at allaboutcookies.org.

Internet browsers normally accept cookies by default, although it's possible to set a browser to reject cookies. We'll ask your permission before using any cookie that's not essential to the email or the use of the website. However, refusing to accept cookies may restrict your use of our website and/or delay or affect the way in which our website operates. You can find more information on cookies when you visit our website.

The open nature of the internet is such that data may flow over networks without security measures, and may be accessed and used by people other than those for whom the data is intended. While this is outside of our control, we do take the protection of your information very seriously and aim to apply appropriate levels of security at all times.