

ERS Broker Privacy Policy

June 2023



The specialist motor insurer

[ers.com](https://www.ers.com)

Controllers:

IQUW Syndicate Management Limited, 30 Fenchurch Street, London EC3M 3BD and
IQUW Administration Services Limited, 30 Fenchurch Street, London EC3M 3BD

Data protection officer: Alan Lovering, 30 Fenchurch Street, London EC3M 3BD

About Us

IQUW Syndicate Management Limited and IQUW Administration Services Limited (“ERS” or “we”) are controllers in respect of your personal information.

Both companies are subsidiaries of IQUW UK Limited (formerly ERS DGB Limited) which is the intermediate holding company for the IQUW Group’s UK companies (together the ‘IQUW UK Group’). The IQUW UK Group’s ultimate holding company is IQUW Holdings Bermuda Limited which is domiciled and incorporated in Bermuda. The main activity of the IQUW UK Group is underwriting general insurance and reinsurance business at Lloyd’s through its participation on Syndicates 218 and 1856.

Syndicate 218 offers a broad range of specialist motor insurance products under the ERS brand to personal lines and commercial market segments predominantly in the United Kingdom. IQUW Syndicate Management Limited (registered in England and Wales No. 426475) is Managing Agent of ERS Syndicate 218 at Lloyd’s and is authorised by the Prudential Regulation Authority (registered number 204851) and regulated by the Prudential Regulation Authority and the Financial Conduct Authority; IQUW Administration Services Limited (registered in England and Wales No. 170558), provides services to the IQUW Group. For more information, please visit ers.com.

This privacy policy describes the way in which we use your personal information and provides details of your rights. It contains important information so please make sure you read it carefully.

Who does this Privacy Policy apply to?

ERS is committed to protecting your personal information. This privacy policy relates to the personal information we collect in relation to individuals (“you”, “your”) who are employed by, work for, manage or own broker companies who conduct business with us (each a “Company”).

This privacy policy applies where you interact with ERS by e-mail, by telephony, in writing, in person or through our online services including where you visit the ers.com website. A separate ERS privacy policy [www.ers.com/policy- pages/privacy-policy](http://www.ers.com/policy-pages/privacy-policy) governs the way in which ERS collects and uses personal information relating to your customers.

This privacy policy should be read in conjunction with the Terms of Business Agreement (“TOBA”) which IQUW Syndicate Management Limited has in place with your Company.

The personal information we may collect about you

Types of Personal Data	Details
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Individual details	Name, address, other contact details such as email address and phone numbers, job title and role, image.
	If you are a director or partner of your Company, we will collect information about your date of birth, national insurance number and current and previous three years' addresses.
Account registration details	Username, passwords.
Marketing preferences	Opt-in/Opt-out
Technical data (if you use our online services or the ers.com website)	Your device and internet connection details such as IP address





Where we collect your personal information

We may collect personal information about you when:

- You or your Company does business with us
- You register for or use our online services or visit the ers.com website
- You register for our newsletter
- You participate in any ERS broker competitions
- You contact or communicate with us - you should note that some telephone calls may be recorded or monitored for the following purposes:
 - Training and quality control
 - As evidence of conversations

How we use and disclose your personal information and our lawful basis for doing so:

Legal basis: Necessary to enter into or fulfil ERS' obligations under the contract between us, or otherwise necessary for ERS's legitimate business needs consistent with the TOBA we have in place with your Company and in the interest of providing an efficient service to you and your customers:

- Set up an account
- Maintain that account
- Allow you to access and make use of ERS online services
- Administer and manage products that your customers have with us
- Manage quotations, enquiries, queries and complaints
- Carry out necessary background checks to make sure you are a legitimate person to do business with.

Legal basis: Necessary for our legitimate business interests to develop, enhance and promote the products and services we provide:

- To market our products and services – we will use your personal information to keep you informed about our products and services subject to your marketing preferences. If you participate in our marketing promotions, we may also use your personal information to administer the promotion and to deliver any prizes.
- To make improvements to our operations – we will use your personal information for research and statistical purposes to analyse how brokers use our website, our products and other services so we can improve our understanding of user needs and enhance our products. We might also share your information with survey organisations to obtain feedback on the service we provide to you.

Legal basis: Necessary for compliance with ERS's legal responsibilities:

- To meet the responsibilities we have to our regulators, tax officials, law enforcement or to otherwise meet our legal responsibilities – if you are a director or partner of your Company we will carry out appropriate verification and credit checks. We use personal information for these purposes to comply with requirements we have under financial conduct rules and laws relating to anti-money laundering, financial crime and to prevent and detect fraud.

Legal basis: With your consent:

- Where we have obtained appropriate consents from you – to collect or use your personal information for a particular purpose. This will always be explained to you separately when we ask for your consent. If we



need your consent to use any specific information, we will make that clear at the time we collect the information from you. You are free to withhold your consent or withdraw it at any time.

If you would like to know more about any of the above that apply to a particular way in which we use personal information you can contact us at any time at www.ers.com/contact.



Use of third-party information

We obtain information about you from third party service providers and databases for assurance purposes. Below is a list of third-party service providers from whom we obtain information about you to help us provide our services:

Third Parties	Reason
Credit check companies	In order to do business with yourselves we will run a credit score report which will show your financial behaviour over the last few years to help us decide whether to give you credit.
Insurance Software Houses	We obtain information from software houses operating a trading platform between us and you to enable you to obtain quotations and insurance premiums for policies underwritten by us.

Disclosing and sharing your information

If you request a quote, or purchase a product on behalf of your customer, information about you and your Company may be shared with and processed by our Third-Party Service Providers who help us facilitate the administration of our business. We enter into contracts with those service providers to make sure they protect you and your customers' personal information using appropriate security measures. Below is a list of service providers that have access to personal information to help us to provide our products and services;

Third Parties	Reason
Fraud Organisations	We share data with fraud organisations to meet our regulatory requirements and to protect ERS, our policyholders and claimants. This includes various providers used to support pricing decisions.
Out of Hours Suppliers	These are contracted parties to handle claims notification and indemnity enquiries outside of the ERS normal operating hours. They may have remote access to ERS Policy and Claims systems.
Motor Insurance Bureau (MIB)	Motor Insurers have a regulatory requirement to submit some personal information about policyholders to the Motor Insurance Database (MID).
Administrative Support	ERS employs third party service providers to manage inbound and outbound correspondence (i.e., scanning, referencing post, cheque processing, printing and postal services) and other administrative tasks.



Document Management	Document storage, tape storage, document destruction.
Professional Advisers	Legal advisers, accountants, auditors, project managers and other professional advisers.
IT and Related Providers	Software licences/subscriptions, outsourced infrastructure support, ERS insurance systems, payment platform providers, telephony infrastructure and recordings.



For further details regarding how we share information related to our products on behalf of your customer, please visit our privacy policy at www.ers.com.

We may also share information about you with:

- Our regulators and law enforcement bodies as necessary for purposes of fraud prevention and detection and legal or regulatory requirements.
- Your customers if they have queries about the services between you, them and us.
- Our social media for competitions where we may publish names, images and company name of winners.

Social media companies that you use, so that they can deliver marketing content to you on our behalf through their platforms (see Marketing and Cookies below). Marketing and Cookies

To protect your privacy rights and your choice and control over the use of your personal information, we will always allow you the opportunity to opt-out of marketing communications when you register your contact information with us. In addition, you can always 'opt out' of receiving direct marketing by using the unsubscribe links you will find on our marketing emails. You can also change your marketing preferences in the Broker preference centre in the profile settings of your online account at any time.

We rely on third-party advertising technology (such as the deployment of cookies or small text files on our website) to collect information about you, which is used to optimise what you may see on our websites and deliver content when you are browsing elsewhere. We may also collect information about your use of other websites. We do this to provide you with advertising that we believe may be relevant for you, as well as to improve our own products and services.

- Our online advertising complies with the best practice recommendation set by the European Advertising Alliance and you will always see the blue logo on display ads visible on third-party sites.
- You can turn off this type of advertising by visiting youronlinechoices.com and adjusting privacy settings in your browser. Please refer to our Cookie Policy for instructions relating to turning off cookies.
- If we use or share information with online sources, such as websites, social media and information sharing platforms, we will respect any permissions you have set about how you would like your personal information to be used.
- If you choose to opt out of tailored offers and advertising, you'll still continue to see generic advertising displayed online, it just might not be as relevant to you.
- Some of the cookies or similar technology on the ers.com website allow third parties including social media companies that you use to collect your information, so that they can deliver marketing content to you on our behalf through their platforms. Where you have consented to our use of these cookies but subsequently wish to opt out of receiving this type of marketing, you should refer to your social media company's privacy policy for information on how to opt out of receiving marketing. Details about the collecting and handling of your personal data by LinkedIn as well as your rights and setting options for protecting your personal information can be found in the LinkedIn privacy policy which can be found at www.linkedin.com. If you do not want LinkedIn to track your behaviour as a LinkedIn member on third-party websites, you can opt out in your LinkedIn settings.
- Please note we are not responsible for the collection, usage and disclosure policies and practices of



other organisations, such as LinkedIn and other social media platforms. Please refer to their privacy policies for further information.



Fraud Prevention and Detection

In order to prevent and detect fraud we may at any time:

- Share information about you with other organisations and public bodies including the Police;
- Undertake credit searches and additional fraud searches;
- Check and/or file your details with fraud prevention agencies and databases, and if you give us false or inaccurate information and we suspect fraud, we will record this to prevent fraud and money laundering.

We can supply, on request, further details of the agencies and databases we access or contribute to and how this information may be used. If you require further details contact our Data Protection Officer at ERS, **30 Fenchurch Street, London EC3M 3BD** or dpo@ers.com.

We and other organisations may also search these agencies and databases to:

- Help make decisions about the provision and administration of insurance, credit and related services
- Trace debtors or beneficiaries, recover debt, prevent fraud
- Check your identity to prevent money laundering, unless you furnish us with other satisfactory proof of identity

Any requests for information we receive from law enforcement bodies or regulators will be carefully validated before any personal information is disclosed.

International Transfers

Some of the organisations we share information with may be located outside of the UK and European Economic Area ("EEA"). We'll always take steps to ensure that any transfer of information outside the UK and EEA is carefully managed to protect your privacy rights. We will only transfer personal information to countries which are recognised as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.

Where we transfer your data to third parties providing us with a service, we will obtain contractual commitments and assurances from them to protect your personal information. Some of these assurances include the standard contractual clauses approved by the European Commission or other contracts which provide equivalent protection. Please contact us, if you want further information on the specific mechanism used by us when transferring your personal data outside of the UK or EEA.

Retention

We will keep your personal data only for as long as is necessary for the purpose for which it was collected. In particular, where we are required to keep your information for legal or regulatory purposes we have different retention periods for different types of information and records. If you would like more information about this, please contact us at the address shown below.



Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a data breach where we are legally required to do so.

Your Rights

You have rights under the Data Protection Act including the right to access the information we hold about you and receive a copy of that information (subject to any legal restrictions that may apply), to have the information corrected if it is inaccurate, and to have it updated if it is incomplete.

We may ask for proof of your identity before we can respond to your request.

You have the right to opt out of receiving marketing at any time. You can use the unsubscribe option that is included in all our marketing emails or contact us using the details given below.

In certain circumstances you may also have the following rights:

- The right to have your data deleted
- The right to restrict or object to the processing of your personal data
- Where you have provided personal data voluntarily, or otherwise consented to its use, the right to withdraw your consent
- The right to receive a copy of the personal information which you have provided to us, in a structured, commonly used and machine-readable format or to request that we transfer that information to another party (known as “data portability”)

If you wish to exercise any of your rights, please contact us at:

dpo@ers.com or write to Alan Lovering at ERS, 30 Fenchurch Street, London, EC3M 3BD.

Changes to this Privacy Policy

We may amend this privacy policy from time to time, for example to keep it up to date or to comply with legal requirements. You should regularly check this privacy policy for updates. If there will be any significant changes made to the use of your personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on www.ers.com.

Contact us

If you have any questions about this privacy policy or how to exercise your rights please contact our Data Protection Officer.

Write to: Alan Lovering, ERS, 30 Fenchurch Street, London,

EC3M 3BD. Email us: dpo@ers.com

Your right to complain If you are not satisfied with our use of your personal information, you have a right to make a complaint to your local data protection supervisory authority at any time. In the UK this is the Information Commissioner's Office. (www.ico.org.uk)

We ask that you please attempt to resolve any issues with us before contacting the ICO.

Information Commissioner's Office
Wycliffe House
Water
Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate)

Email:

icocasework@ico.org.uk



Version	Updates	Name	Date
1.0	Document created	Training & Development	16/05/21
2.0	Page guidance updated	Training & Development	16/06/21
2.1	Updated DPO and amended to Broker Privacy Policy/Change TO template by marketing	DPO/Marketing	23/05/22 07/06/22
3.0	Approval	DPO	07/06/22
3.1 -	Grammatical review – Address Update	DP Analyst	10/08/23



