



# OUR PRIVACY POLICY

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## OUR PRIVACY POLICY

advo is committed to protecting and respecting your privacy at all times. advo group is registered under the General Data Protection Regulation 2018 and we will treat your personal data in accordance with that Regulation. Advo group Limited is registered with the Information Commissions Office under registration reference Z7559664. We are also authorised and regulated under the Financial Conduct Authority.

This privacy statement applies to any personal information you provide to advo group and any personal information we collect from other sources.

### THE PURPOSE FOR WHICH WE WILL USE YOUR DATA

We collect personal and sensitive personal data in order to act as an independent intermediary offering employee services on your behalf. Our Services include insurance broking and arranging insurance cover to suit your needs and the administration of those policies on your behalf. Our HR consultancy offers integrated HR solutions and our services include a helpline offering guidance and advice plus contacts, handbooks employee relations etc. to companies. We process payroll acting as a Bacs-approved commercial bureau and we are HMRC Compliant. We also provide you and your employees with access to our online platform.

### LEGAL BASIS

The legal basis for all three of our services is outlined below:

Insurance - our legal basis for processing your data is the performance of the broking contract including scoping and making recommendations and placing insurance cover.

Payroll - our legal basis for processing your data is the performance of the Payroll function to pay employees correctly and on time.

HR - our legal basis for processing your data is the performance of the HR function and to advise companies on their legal HR obligations.

### WHAT INFORMATION DO WE COLLECT?

For all three functions we collect information such as your name, contact details (such as your home address, telephone number, e-mail address etc.), date of birth, gender, marital status, salary, employment details such as start date with your company, payroll number, cost centre etc. and benefit coverage. We may also collect information about your dependants (spouse/partner and dependent children).

With regards to insurances and employee benefits you understand and give explicit consent that we may also collect sensitive information about your health in relation to risk products (such as Life and Income Protection policies), Private Medical Insurance, employee benefit programmes, Travel and Dental policies and other such medical and employee benefits.

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## **WHAT INFORMATION DO WE COLLECT?** continued..

When you provide us with personal sensitive information you understand and give your explicit consent that we may collect, use, store, and disclose this information to appropriate third parties for the purposes which we have described in this statement. This information is offered on a voluntary basis by us in order to perform our services and at the request of the provider i.e. insurer.

If you decide not to provide your personal information then this may lead to you and/or your dependants being unable to join the company insurance scheme.

With regards to the Payroll function we never collect sensitive personal information although Payroll staff will have access to this information which is stored on our systems.

As part of the HR function the HR team may collect sensitive personal information about employees given to us by the company in course of our duties as HR Consultants.

You have the right to withdraw your consent at any time.

## **WHO IS COLLECTING THE INFORMATION?**

Whilst the personal information we collect may come directly from you, it may also be provided by other third parties (such as your employer, insurance companies, other insurance brokers, Independent Financial Advisors, credit organisations, financial institutions, medical professionals, HMRC, Department of Work and Pensions etc.).

If you provide personal information about other individuals (such as employees, dependants, etc.) you must obtain their consent prior to your disclosure to advo group.

## **HOW IS THE INFORMATION COLLECTED?**

Your Employer or insurance provider other employee benefits providers may send us the information electronically or by hard copy. We may also collect your information from HMRC and Department of Work and Pensions.

## **WHY IS THE INFORMATION BEING COLLECTED?**

We collect information to fulfil your requests for products and services and to improve your online experience. We try where possible to limit the amount of personal information we collect to support the intended purpose of the collection.

We may ask you for some of the following information when accessing our online platform:

- User name, password;
- Communication preference;
- Search queries;
- Information posted in community discussions and other interactive online features.

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## HOW DOES ADVO USE YOUR PERSONAL INFORMATION?

The personal information we collect may be used to:

- Provide information, products and services to you;
- Determine eligibility and process applications for products and services;
- Provide information and services as requested by our clients;
- Understand and assess clients' ongoing needs and offer products and services to meet those needs;
- Carry out client communication, services, billing and administration;
- Handle claims queries;
- Meet our obligations as a Payroll Bureau;
- Execute monitoring and training;
- Give advice on employee issues;
- Develop new services and products;
- Assist our clients as part of our obligations as provider of HR services;
- Market products and services (subject to appropriate consent); and
- Conduct processing necessary to fulfil other contractual obligations for the individual.

## DOES ADVO DISCLOSE YOUR PERSONAL INFORMATION?

We may disclose personal information to business partners that are necessary to provide our products and services. Examples include

Employee Benefits – Insurance companies, insurance brokers, reinsurers, medical service providers, medical practitioners, our advisers such as lawyers and accountants, those involved in claims handling.

Payroll Services – HMRC, Department of Work and Pensions. Bank's and other financial services, Pension providers, Employers.

HR Services – Employers, our advisers such as other HR agencies, our insurers, our legal team.

Authorised Service Providers.

We may disclose your information to service providers we have retained to perform services on our behalf. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements.

Legal Requirements and Business Transfers.

We may also disclose personal information (i) if we are required to do so by law or a legal process, (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iv) in connection with an investigation or suspected or actual illegal activity, (v) in the event that advo is subject to a merger or acquisition to the new owner of the business. Disclosure may also be required for company audits or to investigate a complaint or security threat.

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## **VISITING ADVO GROUP WEBSITES**

In some instances advo automatically collects certain types of information when you visit our websites and through any e-mails that we may exchange. Automated technologies may include the use of Web server logs to collect IP addresses, "cookies" and Web beacons. The collection of this information will allow us to improve the effectiveness of advo's websites and our marketing activities.

By using advo's websites and mobile applications you agree to the processing of your information as explained in this Statement. This includes placing cookies on your device as described in the Cookie Notice.

advo websites may contain links to other sites which are outside our control and are not covered by this Statement. We would encourage you to review the privacy statements of any websites you may visit.

## **COOKIE NOTICE**

advo collects information when you visit our website through the use of cookie technology. A cookie is a piece of programming contained in a very small text file that is placed in your internet browser or elsewhere on your hard drive. You can control your acceptance of cookies by modifying your internet browser preferences. You also have the ability to accept all cookies to be notified when a cookie is set or to reject all cookies. Please note that if you choose to block all cookies, including any essential cookies, you may not be able to access all or part of the website and may be unable to engage or use those services or activities that require the placement of cookies. We use cookies in order to differentiate you from other users of our website and to help us compile stats about the usage on our website.

There may also be occasions when we will use tracking technologies such as web beacons to collect information about your visit to our website. These web beacons are electronic images embedded into the web content or e-mails and are usually not visible to users. This tracking technology enables us to track pages and the content accessed and viewed by users to our websites. It also helps us to provide you with a positive experience when browsing and it also helps us to refine our content. Information about cookies is available on [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **DOES ADVO TRANSFER YOUR PERSONAL INFORMATION ACROSS GEOGRAPHIES?**

advo may transfer certain personal information across geographical borders to service providers in other countries working on our behalf in accordance with applicable law.

By providing us with your information or using our website, you consent to the collection, international transfer, storage and processing of your information. These transfers are governed by European (EU) standard contractual clauses or equivalent data transfer agreements to protect the security and confidentiality of personal information.

## **HOW CAN YOU ACCESS AND UPDATE YOUR INFORMATION?**

advo takes care to make sure that your personal information is kept accurate and complete.

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## HOW CAN YOU ACCESS AND UPDATE YOUR INFORMATION? continued..

You have access to update your own personal information in the following ways:

- Via advo on-line and advo on-line plus you can view and update your personal information after logging into your account;
- Via your employer who will contact us on your behalf;
- By contacting us directly via the advo website "contact us" page by telephone or by writing to us directly;
- If for any reason we are unable to give you access to update your information we will let you know.

## DATA CONTROLLER DATA PROCESSOR

We are a data controller and we are registered with the Information Commissioner's office under registration reference Z7559664. There may also be occasions when we are data processor and we have agreements and contracts in place with insurers and other providers for the purposes of processing employee benefit information and payroll.

## DOES ADVO HAVE SECURITY MEASURES IN PLACE TO PROTECT YOUR INFORMATION?

advo has put in place physical, technical and administrative security measures to protect your personal information from misuse, loss, destruction or amendment.

Any service providers we work with are bound to maintain the confidentiality of personal information and may not use it for any unauthorised purpose.

## DATA RETENTION

### Insurance

We are authorised and regulated by the Financial Conduct Authority. We have an obligation under this regulation to retain the records of your insurance and employee details for seven years. This is so that the regulator can verify that we have complied with our obligations with respect to our customers. We also have to retain records in the event of requests from customers who may require them for evidence when making a claim or if there is a complaint.

We are obliged to remove any individual who has the right to be forgotten and have processes in place to permanently remove personal information about an individual from our data base.

### HR

We will only hold the personal and sensitive personal information of your employees for as long as is needed and no longer. However there may be some instances where we are required to hold information because it is related to disciplinary, grievance or other issues which might result in Tribunal. In these instances we would keep records for 6 years.

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**DATA RETENTION** continued..

## **Payroll**

As a secure BACS approved payroll bureau and commercial bureau we have an obligation to retain records for the purposes of tax returns which are made for employee's salaries, overtime, bonus payments and expenses for a minimum of seven years.

- Wages / salary record (also overtime, bonuses and expenses): 6 years: Taxes Management Act 1970;
- Income tax and NI records: Not less than 3 years after the end of the financial year: The Income Tax (Employments) Regulations 1993 (SI 1993/744) as amended;
- National Minimum/Living Wage: 3 years after the end of the pay reference period: National Minimum Wage Act 1998;
- Working time record: 2 years: The Working Time Regulations 1998 (SI 1998/1833).

You have the right to complain to the Information Commissioners Office if you think there is a problem with the way we are handling your data.

## **YOUR RIGHTS**

You have the right to be forgotten and to be erased from our systems. You also have the right to data portability and we will provide you with details of your insurance cover if you want to pass these details to another provider. You have the right to object to any processing we may complete on your behalf. If you wish to make a complaint then you should contact the Information Commissioners Office [www.ico.org.uk](http://www.ico.org.uk) or call their helpline on 0303 123 1113.

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