

## TERMS OF BUSINESS – PRIVATE CLIENTS

- 1. Regulation.** We, advo group limited, of advo house, St Leonards Road, Maidstone, Kent, ME16 0LS are authorised and regulated by the Financial Conduct Authority (FCA) to sell general insurance products. Our FCA registered number is 308874 and you can check this on the FCA's register by visiting the FCA's website [www.fca.org.uk/firms/financial-services-register](http://www.fca.org.uk/firms/financial-services-register) or by contacting the FCA on 0800 111 6768.
- 2. Our service to you.** In arranging insurance for our customers we act as an independent intermediary and act on your behalf when arranging your insurance. Our service includes: advising you on your health or personal protection insurance needs; arranging your insurance cover with insurers to meet your requirements; and helping you with any ongoing changes you have to make. We offer a range of products and have access to a number of insurers with whom we place insurance. We will give you details of these insurers when we discuss your requirements.
- 3. Disclosure of Information.** It is important that you understand that any information, statements or answers made by you to us, or your insurer, are your responsibility and must be correct. Any failure to disclose facts material to the insurer or any inaccuracies in your answers may invalidate your insurance cover in part or in whole. Facts material to the insurance are matters or information which may influence your insurer as to the acceptability or otherwise of your Proposal or Renewal and must be disclosed immediately. You are advised to keep copies of documentation sent to or received from us for your own protection. Please do consult us if you are in doubt on any aspect. The disclosure of information not only applies at commencement and renewal of your policy, but also at any time during the period of insurance.
- 4. Awareness of Policy Terms.** When a Policy is issued, you are strongly advised to read it carefully, as it is that document, the schedule and any certificate of insurance that is the basis of the insurance contract you have purchased. If you are in doubt over any of the policy terms and conditions, please seek our advice promptly.
- 5. Charges.** We will not charge you a fee for our services in connection with this policy.
- 6.** advo group follows data protection law.
- 7. Personal Data.** The personal data we hold about you and/or your dependants is name, dates of birth, gender, marital status, home address and premium information. We may also hold your e-mail address and nationality. We will hold copies of insurer's quotes and insurers renewal terms.
- 8. Data Controller.** We are registered with the ICO under registration reference Z7559664. We are also a data Processor and process data which is determined by insurers and providers of Health and Personal Protection products.
- 9. Legal Basis.** Our lawful basis for processing personal data is that it is necessary for the performance of the broking contract which involves scoping and placing cover for Private Medical, Personal Protection and other health insurance policies. In order to obtain quotes for you we must provide your personal details, for example name and date of birth for a Private Medical Insurance policy.

10. **Data Retention.** We are authorised and regulated by the Financial Conduct Authority. We have an obligation under this regulation to retain the records of your insurance 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 an individual from our data base.

11. **Safeguards.** All staff and contractors must sign confidentiality agreements and undergo criminal background checks prior to joining or providing services to advo. There is mandatory training on privacy and security awareness included in the induction process for all staff.
12. **Third Parties.** The personal data we hold about you is shared with third parties which will include insurance companies, cash plan providers and other companies who provide health or personal protection policies. This is necessary for the performance of our role as independent intermediaries and the service we provide in arranging and administering insurance products.
13. **Security.** All data stored on staff computers requires strong passwords to access data. If laptops are lost or stolen, data confidentiality and integrity are not at risk, data can be wiped ensuring confidentiality and integrity are maintained.

Security threat and risk assessments (TRAs) are conducted and risk mitigation activities established and assigned to responsible individuals. Data is backed up regularly.

We have procedures in place to detect, report and investigate data breaches. You would be notified of any data breach as well as the Information Commissioner within 72 hours of us becoming aware of the breach.

A disaster Recovery and Business Continuity Plan have been developed and are tested and updated regularly.

Please see advo group Personal Health Information Safeguarding document for full details which is available on request.

14. **Hardcopy Documents Security.** We work electronically however there are occasions when data is in paper form. Any documents which give details of your policy are disposed of using a confidential shredding service. All staff are trained to adhere to document usage procedures and must make sure that all paper documents which give details which would identify a person are disposed of using the confidential shredding service. Staff are expressly prohibited from disposing of paper into waste paper bins or to take documents out of the office unless express permission is provided.

15. **Sensitive Personal Data.** We may hold Sensitive Personal Data which includes health information in relation to personal protection policies (such as Life and Income Protection policies), Private Medical Insurance, Travel and Dental policies and other such benefits. The purpose for holding health data is to be able to assist you and/or your dependants with claims queries.
16. **Claims Assistance.** We will never discuss a claim with anyone apart from the person who has made the claim or their representative, in the case of children or those who are unable due to ill health to speak with us, and a named contact at the insurance company or other provider. We will obtain explicit consent from the claimant to share this information.
17. **Consent.** There may be occasions when we will require consent from you in respect of recording and managing Sensitive Personal Data. Our conditions for obtaining consent is that you will give us explicit consent to us processing your information.
18. **Authentication.** For authentication purposes advo group will ask three data protection security questions to establish your identity when you call us before we provide any information about your policy. We will also ask three data protection security questions when insurance companies and other providers contact us about your policy.
19. **Who handles your Personal and Personal Sensitive information?** Your policy has a dedicated Account Manager and Administrator who have access to your employee's data. There may be occasions when the Account Manager(s) and/ administrators will change and you will be notified of this change and introduced to your new contacts.  
  
Access to your personal and sensitive personal details is restricted on our system by a verification process. There may be occasions when another Account Manager or Administrator will need access to your details, for example to cover holiday or sickness. In these instances they must go through the verification process which is monitored on a monthly basis.
20. **Storage.** Data is stored locally on advo systems and authentication solutions are required for access. All sensitive data is encrypted in traffic and at rest using Transparent Data Encryption (TDE) technology.
21. **Data Portability.** If requested we can provide individual client files in an excel spreadsheet format. This information will only include the information which was provided to us by the individual.
22. **E-mailing Sensitive Data.** There may be instances when we have to e-mail a document which holds personal or sensitive personal data to a third party as part of our broking contract with them. In these instances we will encrypt the data being sent and use Transport Layer Security (TLS) with providers.

23. **Customer Protection Information.** It is our intention to provide you with a high level of customer service at all times. If there are occasions when we do not meet your standards, please contact Mrs. Gill Mateo either verbally or in writing, who will take details of your concerns. We will acknowledge in writing, advising you of who is dealing with your concerns and attempt to address your concerns within five working days. If our investigations take longer, we will provide a full response within twenty working days or explain our position and provide timescales for a full response. If we cannot satisfy your complaint you may be entitled to refer it to the Financial Ombudsman Service.
24. **Cooling Off Period.** We will give you enough information and help so you can make an informed decision before you make a final commitment to buy your insurance policy. However you will have 14 days to change your mind and cancel the insurance contract from the date you receive the policy documentation.
25. **Financial Services Compensation Scheme (FSCS).** We are covered by the FSCS. You may be entitled to compensation from the scheme if we cannot meet our obligations. This depends on the type of business and the circumstances of the claim. Insurance advising and arranging is covered for the first £2000 and 90% of the remainder of the claim without any upper limit. Further information about the compensation scheme is available from the FSCS.



Registered at the Data Users and Computer Bureau under the Data Protection Act 1998. Registration number: Z7559664

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