



Privacy Notice (EU Data Subjects)

Paragon International Insurance Brokers Ltd (Paragon)

Authorised and regulated by the Financial Conduct Authority, Firm Registration Number: 310157. Registered address: 140 Leadenhall Street, London, EC3V 4QT. Registered in England, Company Number: 03215272.

Paragon strives to protect the privacy and the confidentiality of the personal data that it processes in connection with the services it provides. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the 'GDPR'). This privacy notice explains how we use any personal data we collect about you.

Who are we?

Paragon is an insurance intermediary who is regulated by the Financial Conduct Authority, Firm Registration Number: 310157. We are registered in England at 140 Leadenhall Street, London, EC3V 4QT, Company Number: 03215272.

To exercise all relevant rights, or to raise queries or complaints, please contact us by email to compliance@paragonbrokers.com or in writing to the Data Protection Officer, Paragon International Insurance Brokers Ltd, 140 Leadenhall Street, London, EC3V 4QT.

Paragon acts as the data controller in respect of the personal data we collect, this means that we decide how your personal data is processed, and for what purposes as described herein.

Paragon is registered with the Information Commissioner's Office for the products and services we provide: <https://ico.org.uk/ESDWebPages/Entry/Z5757428>

How do we use your personal data?

Paragon's services consist of insurance mediation activities, the introducing, proposing or carrying out other work preparatory to the conclusion of contracts of insurance, and concluding such contracts, assisting in the administration and performance of such contracts and various advisory activities. To carry out these activities Paragon is required to process personal data. Personal data means data which relates to a living individual who can be identified from that data, or from that data and other information which the data controller is in possession of, or is likely to come into the possession of.


Paragon relies on a number of legal grounds under the GDPR when processing such personal data, primarily contractual necessity, legitimate interests and compliance with legal obligations. Paragon's legitimate interests throughout the insurance lifecycle are to ensure that you are within our acceptable risk profile, to determine the likely risk profile and appropriate insurer and insurance product, to correspond with you and other market participants in order to facilitate the placing of your insurance policy, and also to assist you in assessing and making claims.

We only collect and process sensitive personal data where it is critical for the delivery of insurance products and services we provide to you and as allowed under the GDPR. If you object to use of this data then we will be unable to offer you that product or service.

When do we share your information?

Insurance is the pooling and sharing of risk in order to provide protection against a possible eventuality. To do this, information, including your personal data, needs to be shared between different insurance market participants. The insurance market is committed to safeguarding that information. Below is a link to the London Insurance Market Core Uses Information Notice which is designed to help you understand the





complexities of the insurance market and how various insurance market participants may process your personal data in respect of core activities that take place throughout the insurance lifecycle.

[London Insurance Market Core Uses Information Notice](#)

Outsourcing

In order to fulfil its services, it is necessary for Paragon to outsource some of its activities. Paragon carefully selects and manages all of its sub-contractors.

Cross border transfers

During the insurance lifecycle Paragon and insurers and our/their agents may process your personal data outside of the European Economic Area (EEA). If we transfer your personal data outside of the EEA we will ensure an adequate level of protection is in place to protect your personal data with safeguards such as, but not limited to:

- Transferring to a non-EEA country with privacy laws that give the same protection as the EEA
- Putting in place contractual protections that ensures the security of any data passed

How long do we keep your personal data for?

We will keep your personal data securely for as long as is necessary (up to 10 years) to fulfil the lawful purposes for which it was obtained. In some limited cases, it may be necessary to retain your personal data for longer if we need to hold it for liability claim purposes. Our retention periods for personal data are based on legitimate business needs and legal requirements. If you consent to receiving marketing from us, any information we use for this purpose will be held by us until you notify us that you no longer wish to receive marketing information from us.

Your rights


Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- to request a copy of your personal data which Paragon holds about you;
- to request that Paragon corrects any of your personal data if it is found to be inaccurate or out of date;
- to request your personal data to be erased where under Paragon's Retention Policy it is no longer necessary for Paragon to retain such data;
- to object where permissible to the processing of your personal data at any time;
- to request that Paragon provides you with your personal data, and where possible, to transmit the data directly to another data controller (known as the right to data portability);
- where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- to object to the processing of your personal data by automated individual decision-making and profiling.

If you are not satisfied with our use of your personal data or our response to any request by you to exercise any of your rights as described above, or if you think that we have breached the GDPR, then you also have the right to complain to the ICO. The ICO's details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK95AF





Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)
Email: casework@ico.org.uk

Changes to our Privacy Notice

This Privacy Notice is under regular review and subject to change at any time, it was last updated on 4th October 2018. Where we have an engagement with you, we will notify you of any changes.

Further details about data protection can be found at <https://ico.org.uk/>.

