

# REALM PROTECTION PRIVACY POLICY



We take your privacy very seriously. Please read this Privacy Policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information as well as your rights.

Please note that as we provide a range of services, we have separate fair processing notices for our different types of products, so if you take out a policy with us you may need to review more than one notice. This Privacy Policy supplements—but doesn't override—them.

## PERSONAL INFORMATION WE COLLECT ABOUT YOU

When we collect personal information, we are usually collecting it from the individual who is taking out a policy (or individuals where it's taken out jointly), or the individuals covered under the policy. Sometimes we need to ask for personal information about other individuals such as details about your client, dependents, your marital status or beneficiaries under a policy, product or service. Where you provide information about such individuals we will assume that you have their permission, where required and recommend that you share this Privacy Policy with them.

We collect most of this personal information directly from you, including if you are a broker or intermediary—in person, by telephone, text or email and/or via our website and apps or where you fill out a policy or claim form for yourself or do so on behalf of a client. If you are unable to provide the information yourself, e.g. due to illness, we may need to verify the identity of your representative, next of kin, etc., to check they have the correct information and your permission to act for you.

The types of personal information we collect about you depends on the particular products and services we provide to you. We will collect and/or process the following personal information about you:

- Contact information, including email address and telephone number and if relevant company details;
- Name, date of birth, marital status, residency status/ and your relationships to other people, e.g. family members;
- Information to check and verify your identity, e.g. your date of birth, national insurance numbers, etc.;
- Gender, age and other descriptive data;
- Health and lifestyle data, including details of your Body Mass Index (BMI), height, weight, whether you do or have ever smoked or used tobacco products, details regarding alcohol consumption, details of your medical history. For further information see [Sensitive Personal Information](#) below.
- Policy and Claims Data: such as quotes, policies, schemes and claims (this includes information about the claim collected from you, your next of kin or another relative, your legal representative or other relevant third parties) and any other information relevant to your product, including policy and claim histories;
- Details of your work history: such as your employment status, job title, salary, bonuses and employment and history;
- Details of your property, details of income, tax bands, mortgage and property valuations (if applicable to the product/policy);
- Depending on the policy or product, details of your existing mortgage or endowment provider or information provided by your mortgage intermediary/broker/bank/building society and other third parties providing services to them;
- Depending on the policy or product, e.g. mortgage protection where there are other people who are occupants at the property which is subject to a lifetime mortgage;
- Details of any vulnerability you notify us of or which we are concerned about—we collect and record information about health, life events, resilience and capability to help us identify if you might have additional support requirements;
- Data we already hold on file, e.g. policy and claim histories relating to other existing policies or products you may have held in the past;
- Call and webchat recordings with us;
- Financial information such as billing address, credit and payment card numbers, bank account details, payment information;
- Account and Password Data, such as account log-in information, usernames, policy numbers, passwords and memorable data for accessing your accounts;
- Marketing and service communications, such as contact details, communications preferences, feedback about your customer experience, etc.;
- Information about how you use our website, IT, communication and other systems;
- Information gathered via cookies (see our [Cookies Policy](#))

We explain more about how and why we process this data in the following tables (see [How and Why We Use Your Personal Information](#)).

DATA SOURCED FROM THIRD PARTIES

Sometimes we need to collect data that is provided to us by third parties to help us process your policy/quote/claim or meet your needs for example:

- Verifying Contact Data, e.g. where you have moved address, changed your telephone number or started using a new email address. We only use this to ensure that we have up to date records on our systems and do not use it for marketing unless we have permission to do so.
- Healthcare providers and medical practitioners, e.g. your doctor;
- In the event of a claim—legal advisers, medical experts and in limited circumstances, private investigators;
- Third parties relevant to your product, quote or claim, including other insurers, brokers and advisers;
- Financial crime detection agencies, databases and sanctions lists;
- Agencies including the police, the courts, the Department for Work and Pensions (DWP), Companies House, the National Health Service (NHS) and HM Revenue & Customs (HMRC);
- Our regulators who govern how we operate, including the Financial Conduct Authority (FCA), Information Commissioner’s Office (ICO) and Financial Ombudsman Service (FOS);
- Debt advisors, e.g. in the event of non-payment of policy fees;
- Data verification services, e.g. data providers who help us maintain the accuracy of our data, e.g. by identifying individuals who are deceased, demographic data, independent property valuation databases, updating contact details for individuals who have moved home and payment card providers who provide us with updated payment card details;
- Fraud and sanctions checks, e.g. searches of fraud database, AML, sanctions checks, and publicly available sources. To prevent, detect and investigate fraud, we:
  - check public registers (e.g. the electoral roll or registers of county court judgments, bankruptcy orders or repossessions);
  - conduct online searches from websites and social platforms;
  - use databases managed by credit reference agencies, insurance industry bodies, fraud detection agencies etc.; and
  - work with other insurers, fraud prevention agencies, law enforcement agencies, public bodies and our regulators, e.g. the Financial Conduct Authority.

If you give us false or inaccurate information and we suspect fraud, we record this on our records and this may be shared with third parties such as those described in this policy.

- Our actuaries, auditors, legal advisers and other professional service firms and sanctions checking service providers;
- Providers of marketing and advertising services as well as third parties who provide us with details of individuals who have given permission to learn more about our products;
- Third parties in connection with any acquisition or disposal of a business by us;
- Cookies and Tracking Data—e.g. mobile device number, device type, operating system, browser, MAC address, IP address, location and account activity obtained through our use of cookies. You can find more about our use of cookies in our [Cookies Policy](#).

SENSITIVE PERSONAL INFORMATION WE COLLECT ABOUT YOU

Sometimes we will request or receive personal Information that is sensitive. This is information which is related to things such as health, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership. It also covers criminal offence data, including information about criminal activity, allegations (including those unproven), investigations, proceedings and penalties. An example of where we would process this is if we needed health information (e.g. existing and previous physical or mental health conditions, health status, test results, medical diagnoses and treatment given, prescriptions and personal habits (e.g. smoking, alcohol consumption, etc.) in order to quote or assess a claim in relation to our Policies. We explain more about how and why we process this data in the tables below (see **How and Why We Use Your Personal information**).

HOW AND WHY WE USE YOUR PERSONAL INFORMATION

We can only use your personal information if we have a reason. By law, we must have a justification, to process your data known as a 'lawful basis'. The table below explains what we use your personal information for and why.

WHAT WE USE YOUR PERSONAL INFORMATION FOR	WHY
Providing products and/or services to you including: <ul style="list-style-type: none"><li>• Processing our application or to provide a quote</li><li>• Providing and administering a policy, as well as to take or make payment</li></ul>	<ul style="list-style-type: none"><li>• To perform our contract with you or to take steps at your request before entering into a contract ('Performance of a Contract')</li><li>• Legitimate interests</li><li>• To comply with our legal and regulatory obligations</li></ul>

WHAT WE USE YOUR PERSONAL INFORMATION FOR	WHY
Preventing and detecting fraud against you or us as well as conducting other credit checks, etc.	<ul style="list-style-type: none"> <li>• 'Performance of a Contract'</li> <li>• To comply with our legal and regulatory obligations</li> <li>• Legitimate interests</li> </ul>
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator	To comply with our legal and regulatory obligations
To identify, record details of and assist customers requiring additional support	<ul style="list-style-type: none"> <li>• To comply with our legal and regulatory obligations</li> <li>• Legitimate interests</li> </ul>
To enforce legal rights or defend or undertake legal proceedings	<ul style="list-style-type: none"> <li>• To comply with our legal and regulatory obligations</li> <li>• In other cases, for our legitimate interests, i.e. to protect our business, interests and rights</li> </ul>
Meeting our legal or regulatory obligations	Compliance with a legal obligation
Working with third parties, e.g. brokers, claims managers, IT providers, admin support providers, etc.	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> </ul>
Assessing and managing Claims made under a Policy	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• To comply with our legal and regulatory obligations</li> <li>• Legitimate interests</li> </ul>
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control, accounts, financial analysis, internal audit	<ul style="list-style-type: none"> <li>• For our legitimate interests, i.e. to be as efficient as we can so we can deliver a quality service to you at a competitive price</li> <li>• Compliance with a legal obligation</li> </ul>
Ensuring the confidentiality of commercially sensitive information	<ul style="list-style-type: none"> <li>• Legitimate Interests, i.e. to protect trade secrets and other commercially valuable information;</li> <li>• To comply with our legal and regulatory obligations</li> </ul>
Statistical analysis and archiving to help us manage our business, e.g. claims modelling, our financial performance, customer base, product range or other efficiency measures	Legitimate Interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	<ul style="list-style-type: none"> <li>• Legitimate Interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us;</li> <li>• To comply with our legal and regulatory obligations</li> </ul>
Protecting the security of systems and data used to provide our products and services	<ul style="list-style-type: none"> <li>• To comply with our legal and regulatory obligations</li> <li>• Legitimate Interests</li> </ul>
Updating and enhancing customer records	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• To comply with our legal and regulatory obligations;</li> <li>• Legitimate interests, e.g. making sure that we can keep in touch with our customers about existing orders and new products</li> </ul>
Marketing our services and those of selected third parties (see <a href="#">Marketing</a> below).	<ul style="list-style-type: none"> <li>• Legitimate Interests (our own marketing)</li> <li>• Consent (for third parties)</li> </ul>
Communicating with you and others including complaints handling	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• To comply with our legal and regulatory obligations</li> <li>• Legitimate interests</li> </ul>

WHAT WE USE YOUR PERSONAL INFORMATION FOR	WHY
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	<ul style="list-style-type: none"> <li>• Legitimate interests, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards;</li> <li>• To comply with our legal and regulatory obligations</li> </ul>
To share your personal information with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency	<ul style="list-style-type: none"> <li>• Compliance with a legal obligation</li> <li>• Legitimate interests, i.e. to protect, realise or grow the value in our business and assets</li> </ul>

Where we rely on legitimate interests as our lawful basis, we are required to carry out a balancing test to ensure that our interests, or those of a third party, do not override the rights and freedoms that you have as an individual. The outcome of this balancing test has helped us to determine whether we can use your personal information for the purposes described in this Privacy Policy. You can contact us for further information about this (see **Contact Us** below).

## HOW AND WHY WE USE YOUR SENSITIVE PERSONAL INFORMATION

When we collect Sensitive Personal Information, additional legal protections apply to it. We are also required to have an additional lawful basis to process it, the lawful reasons we process your data are:

- Where there is a substantial public interest:
  - insurance purpose—which includes activities like advising on, arranging, underwriting and administering contracts of insurance, administering claims and exercising rights, or complying with obligations that arise in connection with contracts of insurance;
  - complying with or assisting another party to meet their regulatory obligations, e.g. fraud, undertaking sanctions and money laundering checks, unlawful acts and dishonesty;
  - preventing or detecting unlawful acts—including disclosures to competent authorities, e.g. Action Fraud or the Police
  - preventing fraud—including investigating alleged fraud;
  - safeguarding the economic well-being of certain individuals—for example where we identify that a customer may need additional support due to a vulnerability;
  - equality of opportunity or treatment—including where we need ensure we are meeting our requirements to assist customers who may have additional support needs.
- Where it is necessary to establish, exercise or defend a legal claim, e.g. legal proceedings, where we bring or are subject to legal proceedings ourselves, as well as where we are involved or assisting with legal proceedings that a third party has brought against you;
- Information has been made obviously public by you or is widely available via public source, e.g. social media, press, etc.

The Table below sets out some of our common use cases and the legal basis on which we rely:

WHAT WE USE YOUR SENSITIVE PERSONAL INFORMATION FOR	WHY
Communications and complaints handling	<ul style="list-style-type: none"> <li>• Necessary for insurance purposes</li> <li>• Legal claims</li> <li>• Necessary for safeguarding economic well-being of certain individuals</li> </ul>
Identifying and meeting the needs of customers requiring additional support	<ul style="list-style-type: none"> <li>• Necessary for safeguarding economic well-being of certain individuals</li> <li>• Necessary for the equality of opportunity or treatment</li> <li>• Explicit consent</li> </ul>
Processing your application in order to provide a quote or policy, including administering the policy and taking payments	<ul style="list-style-type: none"> <li>• Insurance Purposes</li> <li>• Legal claims</li> </ul>
Managing third party relationships, e.g. brokers, underwriters, re-insurers	<ul style="list-style-type: none"> <li>• Insurance Purposes</li> </ul>
Managing Claims (e.g. assessing the validity of a claim, paying out on a claim, etc.)	<ul style="list-style-type: none"> <li>• Insurance Purposes</li> <li>• Legal claims</li> </ul>

WHAT WE USE YOUR PERSONAL INFORMATION FOR	WHY
Investigations and identification of financial or other crime and fraud	<ul style="list-style-type: none"> <li>• Insurance Purposes</li> <li>• Clearly or obviously made public by you</li> <li>• Prevent or detect crime</li> <li>• Prevent fraud</li> <li>• Legal claims</li> <li>• Regulatory requirement relating to unlawful acts or dishonesty</li> <li>• Necessary for safeguarding economic well-being of certain individuals</li> </ul>
Meeting our legal or regulatory obligations	<ul style="list-style-type: none"> <li>• Regulatory requirements relating to unlawful acts or dishonesty</li> <li>• Insurance Purposes</li> <li>• Legal claims</li> </ul>
Exercising, establishing, enforcing or defending legal rights (of ourselves or others)	<ul style="list-style-type: none"> <li>• Legal claims</li> <li>• Regulatory requirements relating to unlawful acts or dishonesty</li> </ul>
Quality assurance, training and security	<ul style="list-style-type: none"> <li>• Legal claims</li> <li>• Explicit consent</li> </ul>
Managing our day to day business operations, e.g. accounts, financial analysis, internal audit	<ul style="list-style-type: none"> <li>• Legal claims</li> <li>• Explicit consent</li> <li>• Prevent or detect crime</li> <li>• Prevent fraud</li> <li>• Regulatory requirement relating to unlawful acts or dishonesty</li> </ul>
Data analytics and insurance modelling, statistical analysis, research and archiving	<ul style="list-style-type: none"> <li>• Insurance purposes</li> <li>• Necessary for archiving, research or statistical analysis</li> </ul>
Where we need to claim against our own insurance	<ul style="list-style-type: none"> <li>• Insurance</li> <li>• Legal claims</li> </ul>
Buying, selling, transferring or disposing of our business	<ul style="list-style-type: none"> <li>• Legal claims</li> <li>• Explicit consent</li> <li>• Insurance</li> </ul>

If we cannot justify our processing under one of the above grounds we will rely on consent. Please note that in most instances of our processing consent is not required and would not be valid as it may not be freely given by you. If you want to know more about how and why we process your sensitive personal information, you can contact us (see **Contact Us** below).

## MARKETING

We will use your personal information to send you updates (by email, text message, telephone or post) about our products and/or services, including exclusive offers, promotions or new products and/or services. We have a legitimate interest in using your personal information for marketing purposes (see above **How and Why We Use Your Personal Information**).

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at [info@realmprotection.co.uk](mailto:info@realmprotection.co.uk);
- using the 'unsubscribe' link in emails or 'STOP' number in texts

If we share your data with third party companies for marketing purposes we will only do so with your consent. Please note that if you agree to be contacted by such third parties you will need to speak to them directly to opt out of future communications from them. We may ask you to confirm or update your marketing preferences if you ask us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business. Please note that if you opt out of marketing this does not mean that you will be opted out of service communications as such correspondence contains important information regarding your policy.

## WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share personal information with:

- third parties we use to help deliver our products and/or services to you, e.g. payment service providers, warehouses and delivery companies;

- other third parties we use to help us run our business, e.g. IT support, website hosting, administrative service providers, marketing agencies, card payment processors, claims managers, research agencies or website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
- industry bodies such as the Association of British Insurers (ABI);
- underwriters, brokers, intermediaries and re-insurers who help us to arrange, manage and underwrite our products and who provide insurance services;
- credit reference agencies, financial crime or fraud detection agencies, sanctions checking providers and fraud detection databases;
- depending on the policy/product- your existing mortgage or endowment provider or mortgage intermediary/broker and other third parties providing services to them;
- database providers who validate the valuation of your property;
- third parties who may be instructed to assess or investigate the relevant insurance policy or claim, e.g. medical experts, private investigators;
- data verification services/databases which help to identify deceased persons, contact details for individuals who have moved and updated payment card details;
- medical professionals, if we need to access health records or assessments for the purposes of arranging and underwriting a policy or paying out on a claim.

We or the third parties mentioned above occasionally also share personal information with:

- our and their external auditors, e.g. in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- legal advisers, accountants, auditors, financial institutions and professional service firms who act on our or your behalf;
- law enforcement agencies, courts, tribunals, government bodies (e.g. DWP, HMRC) and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal information will be bound by confidentiality obligations.

## AUTOMATED DECISION MAKING

In order to provide policies at a competitive price and assess how much risk we are holding on the policies we underwrite, we may need to make decisions about you based on automated decision making. We use this to help us to make predictions, e.g., the likelihood that a claim or pay-out may be made and its value. We also consider things such as what is the likelihood a product will be purchased or that a claim might be fraudulent. We require this information in order to manage our commercial, legal and regulatory risks, e.g. to determine eligibility for a policy, fraud indicators, the terms of the policy and the price. We use these tools throughout the lifecycle of your policy, e.g. claims, cancellations, renewals, changes or extensions to existing policies. For example, when deciding whether to offer a quote for a policy and on what price we need to understand details of your health so we can assess the policy premium for income protection or your current mortgage status and retirement age so we can determine what your mortgage protection premium might be. As our decision making could have a legal or substantially similar effect on you, you have certain rights in relation to that decision such as the right to receive meaningful information about the logic involved in relation to the decision and the right to obtain an explanation of the decision as well as to have it reviewed by a person. See **Your Rights** (below).

## PROFILING AND DATA ANALYSIS

We also use profiling and other data analysis to build, train and audit our insurance models and algorithms and our machine-learning tools. The models, algorithms and tools we use help us do a number of things including:

- understanding our customers and potential customers better, e.g. likes and dislikes, which products are popular, etc.; and
- predicting the likelihood of events arising to assess insurance risk, the likelihood a product will be purchased, or to predict whether the information you have given us is correct or the likelihood a claim might be fraudulent.
- to ensure data quality and accuracy and to help us improve our business.

We take care when using this data and carefully consider if there is any risk of cause outcomes that are unfairly or unlawfully biased. We do not use this data to make decisions about individuals, it is to allow us to look at trends and make predictions so we can manage our books of business and strategy more effectively. If you would like more information about how we use profiling tools, please contact us (see **How To Contact Us** below).

## WHERE YOUR PERSONAL INFORMATION IS HELD

Personal information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: **Who We Share Your Personal Information With**). Some of these third parties may be based outside the UK/ European Economic Area (EEA). For more information, including on how we safeguard your personal information when this happens, see **Transferring Your Personal Information Out of the UK and EEA**.

## HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will process your personal information for so long as it is necessary for the purposes explained in this Privacy Policy. Different retention periods apply for different types of personal information, e.g. 7 years for insurance policies. We may need to hold some types of data such as data related to legal, regulatory, tax or accounting needs for longer if required to be so by law. We may also need to retain data so that we can manage our relationship with you, e.g. recoding the information you give to us or where there is a complaint or issue that you may raise in the future. We also retain records if we consider that there is a risk of future litigation. If you would like more information about our data retention policy, please contact us (see **How To Contact Us** below).

## TRANSFERRING YOUR PERSONAL INFORMATION OUT OF THE UK AND EEA

It is sometimes necessary for us to transfer your personal information to countries outside the UK and European Economic Area (EEA). In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal information. Under data protection laws, we will only transfer your personal information to a country outside the UK/EEA where:

- the UK government has decided the particular country ensures an adequate level of protection of personal information (known as an 'adequacy regulation')
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal information (known as an 'adequacy decision')
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

## KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your personal information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## WHAT ARE YOUR RIGHTS?

**Access to your personal information:** You may request access to a copy of your personal information.

**Right to withdraw consent:** Where we rely on consent as our basis of processing you may withdraw your consent at any time.

**Rectification:** You may ask us to rectify inaccurate Personal information held about you.

**Erasure:** You may ask us to delete your personal information, specifying why you would like us to delete your personal information.

**Portability:** You may ask us to provide you with the Personal information that we hold about you in a structured, commonly used, machine readable form, or ask for us to send such personal information to another data controller.

**Right to object:** You may object to our processing of your personal information pursuant to this Privacy Policy.

**Make a complaint:** See **How to Complain**.

For more information on each of those rights, including the circumstances in which they apply or to exercise them, please contact us (see **How To Contact Us** below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights](#).

## HOW TO COMPLAIN

Please contact us if you have any queries or concerns about our use of your personal information (see below **How To Contact Us**). We hope we will be able to resolve any issues you may have, however you also have the right to lodge a complaint with the relevant data protection supervisory authority. The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113. For a list of EEA data protection supervisory authorities and their contact details, see [here](#).





## CHANGES TO THIS PRIVACY POLICY

This Privacy Policy was published on 1 November 2021. We may change this Privacy Policy from time to time—if there are material updates which affect your rights or substantively alter how we process your personal information we will notify you of these changes via our website *or* other means of contact such as email.

## HOW TO CONTACT US

If you have any questions relating to our Privacy Policy, please email us at [info@realmprotection.co.uk](mailto:info@realmprotection.co.uk) or use our enquiry form in the contact us section of the website.

## DO YOU NEED EXTRA HELP?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see **How To Contact Us** above).