



PRIVACY POLICY

Version 1.2

Roots Insurance Brokers Limited. Registered Office: Jason Works, Clarence Street, Loughborough, Leicestershire, LE11 1DX. Registered in England and Wales number: 12676044.

To give you the best service possible we will need to ask you for certain personal information. If you use our services, we will also use this information for security, identification and verification purposes.

As controller of your data, we comply with Data Protection laws in the United Kingdom. This Privacy Policy details how we process your personal data.

THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data collected, used, stored and transferred by us may include:

- **Identity Data** including forenames, last name, maiden name, date of birth, gender, marital status, and username or similar identifier.
- **Contact Data** including home address, email address and telephone numbers.
- **Financial Data** including banks statements, payment card details, savings, debts such as loans and credit cards, income & expenditure, employer & pension benefits, and other assets.
- **Special Category Data** medical history and trade union/political party membership costs.
- **Transaction Data** including payments made for products and services you have purchased from us.
- **Technical Data** including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices used to access the Roots Insurance Brokers website.
- **Profile and Usage Data** including purchases made by you, feedback and survey responses, and how you use our website, products and services.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our business partners and your communication preferences.

HOW DO WE COLLECT YOUR PERSONAL DATA?

Personal data is collected by us using the following methods:

- **Direct interactions:** with an adviser in person, by post, phone (including call recordings and voicemail), email, videoconferencing or otherwise when sourcing and applying for services and products, processing Identity, Contact and Financial categories of personal data.
- **Automated technologies or technical interactions:** with our website, via the customer portal, by using the web enquiry form, processing Identity, Contact, Financial and Technical categories of personal data.
- **Third parties or publicly available sources:** processing Identity, Contact and Financial categories of personal data.

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HOW DO WE USE YOUR PERSONAL DATA?

Purpose/Activity	Type(s) of Data	Lawful Basis for Processing
To initially engage with you to discuss your requirements.	<ul style="list-style-type: none"> Identity Contact 	Consent.
To source services and products, provide indicative quotes, and process & deliver your application for services and products.	<ul style="list-style-type: none"> Identity Contact Financial Transaction Marketing & Comms Special Category 	Performance of a contract with you. To comply with a legal obligation. Necessary for our legitimate interest (to recover debts due to us). Explicit consent.
To manage our client relationship with you which will include: <ul style="list-style-type: none"> Create and maintain access to your customer portal account. Notifying you about changes to our terms or privacy policy. Customer reviews/surveys. Re-engagement when existing services and products near expiry/review. 	<ul style="list-style-type: none"> Identity Contact Profile & Usage Marketing & Comms 	Performance of a contract with you. To comply with a legal obligation. Necessary for our legitimate interests, to re-engage with you to review your existing products and services, and to maintain and improve customer service standards.
To respond to case enquiries and input to & defend against complaints.	<ul style="list-style-type: none"> Identity Contact Profile & Usage Transaction Marketing & Comms Special Category 	To comply with a legal obligation. Necessary for our legitimate interest (to ensure that complains can be responded to accurately). Legal Claims & Judicial Acts.
To perform an affordability check for a service or product.	<ul style="list-style-type: none"> Identity Contact Financial Profile & Usage 	Necessary for our legitimate interests and of the third party involved in providing the service or product.

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<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<p>To comply with a legal obligation.</p> <p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile & Usage • Marketing & Comms • Technical 	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).</p>
<p>To use data analytics and other systems including AI and automated decision making to improve our website, products/services, marketing, customer relationships and experiences.</p>	<ul style="list-style-type: none"> • Identity • Contact • Financial • Special Category • Technical • Profile & Usage 	<p>Consent/Explicit Consent.</p> <p>Necessary for our legitimate interests (to analyse customer usage, update our website, to develop our business and to inform our client re-engagement and marketing strategy).</p>

CHANGE OF PURPOSE

We will only use your personal data for the purposes stated above, unless we reasonably consider that we need to use it for another reason, and it is compatible with the original purpose. Please contact us for an explanation as to how any new processing is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

USE OF AI AND AUTOMATED DECISION MAKING

We may use your data in AI and automated decision-making systems for re-engagement purposes as a legitimate interest to review your existing services and products and source suitable new services and products. If you do not wish your data to be used by such systems, please notify us at customer.service@rootsinsurancebrokers.co.uk.

MARKETING COMMUNICATIONS

You will also have the choice to opt-in to receiving other related marketing information and related products and services. You can opt-out of receiving these types of communications at any time by contacting your adviser, by emailing customer.service@rootsinsurancebrokers.co.uk or by clicking on the relevant link in email



communications you receive from us. However please note that your personal information will not be passed to any third-party organisation for marketing purposes except within the Roots Insurance Brokers and Vestura Group companies.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to only those Roots Insurance Brokers and Vestura Group staff, appointed representatives, advisers, business partners and suppliers who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

COOKIES

When using the Roots Insurance Brokers website, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

WEBSITE THIRD-PARTY LINKS

The Roots Insurance Brokers website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

SHARING OF PERSONAL DATA OUTSIDE OF THE UNITED KINGDOM

Some of our external suppliers are based overseas so their processing of your personal data will involve a transfer of data outside of the UK. In such cases data is transferred under conditions to provide protection to personal data equivalent to the General Data Protection Regulation (GDPR). This includes the use of standard contractual clauses approved by the European Commission in contracts with external suppliers in order to provide the same level of protection for personal data as it has in the EEA.

WHO WE DISCLOSE PERSONAL DATA TO

Type of Recipient	Reason
Within the Vestura Group	Depending on your requirements, we may share your personal data within the Vestura Group of companies (which have common ownerships) as well as specialist product providers for us to source relevant products and services or to re-engage with existing clients. The Vestura Group of companies consists of: Vestura Group Limited, Roots Insurance Brokers Limited (also trading as Roots Contractor, and Contractor Insurance Brokers), The Mortgage Lodge Limited (also trading as Roots Contractor), The Contractor Compliance Portal Limited, The Will Place, Oakwood Capital Wealth Management Limited, Knights Row Limited, and Ignition Labs Limited.

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Third party service and product suppliers	To source and submit applications in order to conclude contract, including for insurance, mortgage and protection applications and the ongoing servicing of these contracts.
Financial Institutions	To source your bank account information via Open Banking with your consent.
External suppliers	Specialist IT system providers to deliver our service to you (including sourcing of products, providing continuing advice, sharing of documentation, payment processing, informing you about relevant products and services, service & advice quality checking and improvements, and to request feedback on customer service standards). It may also be necessary to share your personal data with non-affiliated companies who perform support services on our behalf including those that provide professional, legal or accounting advice to Roots Insurance Brokers.
Solicitors and Conveyancers	To update the firm of solicitors and conveyancers with whom you are interacting about the progress of your application and confirm your identity and proof of deposit.
Insurers, estate agents and new home builders	To update the firm of insurers, mortgage and protection advisers, estate agents and home builders with whom you are interacting about the results of affordability checks and progress of your application.
Licensed Credit Agencies	For the purposes of confirming your identity to comply with Anti Money Laundering requirements (TransUnion data processing information can be found in the privacy notice on the www.callcredit.co.uk website); to perform a credit assessment to assess your eligibility; as part of an application request for a Lenders Decision In Principle; and to perform a credit assessment with your consent as part of a full application.
Regulators	In order to fulfil our legal obligations as a regulated profession, for example with the Financial Conduct Authority, to verify your identity and comply with Anti Money Laundering legislation, and otherwise co-operate with law enforcement, legal proceedings or regulatory authorities.
Others	Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

These companies are required to ensure appropriate security measures are in place and maintain the confidentiality of your personal data, and to use your personal data only in the course of providing such services and in accordance with Roots Insurance Brokers instructions.

HOW LONG IS YOUR PERSONAL DATA RETAINED?

Purpose of Processing	Retention
Successful service and product applications	For the full service or product policy term plus a further 6 years, or for a period of 30 years for historical cases if the original term is not recorded.
Withdrawn, stalled, incomplete and failed service and product applications	2 years from the date the latest application was started, or 6 years from the application submitted date if application was submitted and subsequently rejected or from creation date if advice has been provided but not pursued.
Client Portal accounts	2 years from the date of last login if not proceeded to full application.

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Affordability assessments	2 years from Decision In Principle if affordability check does not proceed to a full application.
Enquiry data obtained from third parties that do not result in an application	2 years from the date the lead was received from the Introducer.

After these retention periods if there is no other on-going client relationship your personal data will either be securely deleted or anonymised so that it can be used for statistical purposes but without any method of identifying you individually.

YOUR LEGAL RIGHTS REGARDING YOUR PERSONAL DATA

You have the right to:

Request

Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction

Request correction of the personal data. This enables you to have any incomplete or inaccurate data corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure

Request erasure of your personal data. This enables you to ask us to delete personal data where there is no good reason for us continuing to process it. You can also to ask us to delete your personal data where you have successfully objected to the processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to delete the data for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



Request the transfer

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

FINDING OUT ABOUT THE PERSONAL DATA WE HOLD ABOUT YOU

What personal data do we hold about you?

If you want to see what personal data we hold on you and how it is processed, you may contact us to request this. This is known as a Data Subject Access Request (DSAR) and you must request this in writing (either by post or email), providing the necessary identification before any information is released. If we do store any of your personal data, you may request information on the following:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the GDPR owner, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of [insert company name] or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will you need to provide in order to access this?

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We require one form of identification from the following list when information on your personal data is requested:

- Passport.
- Photo Driving Licence.
- Notarised ID Document.

Contacting us

If you wish to submit a DSAR, or have any questions regarding this privacy statement, you must do so in writing using the following information.

Address: Customer Service Department, Roots Insurance Brokers, Jason Works, Clarence Street, Loughborough, Leicestershire, LE11 1DX

Email: customer.service@rootsinsurancebrokers.co.uk.

Telephone: 01509 380 127.

QUESTIONS

If you have any questions or complaints relating to how we use your personal data, or if you wish to exercise any of your rights regarding your personal data, please contact the Compliance Manager by emailing customer.service@rootsinsurancebrokers.co.uk or by writing to us. We will respond to you as soon as is possible. The length of time will depend on the type and complexity of the request, but you will receive a response no later than one month from the initial request.

WHAT IF I AM STILL NOT SATISFIED?

If you are not satisfied with how Roots Insurance Brokers has responded to your enquiry, you have the right to complain to the [Information Commissioner's Office](#) (ICO), who is the regulator for data protection in the United Kingdom.

CHANGES TO OUR PRIVACY POLICY

We keep our Privacy Policy under regular review. This policy was last updated on 18th February 2024. Historic versions can be obtained by contacting us.

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