

# Halcyon HealthCare Privacy Policy

## Introduction

Halcyon Healthcare is an independent specialist health and protection insurance broker that assists clients to select and purchase health and protection insurance policies that best fit their particular healthcare needs. In order to provide appropriate advice and assist with applications for policies, we need to collect clients' personal data including sensitive health related personal data. This notice explains how we collect, store and protect your personal data.

## Legal Basis

Contractual necessity, that is responding to your request to research, recommend and arrange your insurance policies, is the lawful basis for collecting, controlling and processing your personal data and those of your family members and employees. Sensitive health related personal data will only be requested after receiving an individual's personal consent by their completion of our Demands & Needs questionnaire.

## Collection of your Personal Data

If you contact us through our website enquiry form your contact data will be protected as confirmed by the SSL certificate displayed on our website and transmitted to us by secure, encrypted e-mail. If you contact us by e-mail, letter, telephone, in person, or via an introducer, we will send you our Demands & Needs Questionnaire by secure encrypted e-mail.

To respond, you can enter and send us your personal data by replying to our secure e-mail and attaching your completed questionnaire which will then be securely encrypted. Our receipt of your completed and signed copy of our Demands & Needs Questionnaire will confirm acceptance of our Privacy Policy and our Terms of Business.

## The Personal Data that we need when providing our services

Your title, name and address, date of birth & gender.

Your contact details, e-mail address and telephone numbers

When purchasing, reviewing or renewing a policy, your bank account or payment card details.

When purchasing, reviewing or renewing a policy, your health history.

For our recommendations for the purchase of Life, Critical Illness and Income Protection policies, the completion of our Fact Find to establish your needs for additional Protection Insurance.

## Sharing your Data

In order to find, recommend and arrange the policies that best fit your needs we will need to share your data with other data controllers including insurers' sales, underwriting and claims departments, our data processors and sometimes our advisers including our compliance consultant, regulators, lawyers and accountants, and other parties if required to do so by law. All our service providers to whom we submit your data are also bound by data protection legislation to maintain the confidentiality of your data and not to use it for any unauthorised purpose.

## Data Controllers

- The insurers from whom we obtain policy details and quotes, on your behalf, and with whom we place your policies.
- The Financial Conduct Authority
- Our Compliance Consultant

## Data Processors

- The company that hosts our website
- The company that stores all our company files, including our client files, on remote secure servers that are located in the UK
- The company that provides our secure encrypted e-mail service
- Our IT software provider and internet security provider
- Our telephone service providers.

## Data Retention

- Your personal data will only be retained by us for as long as you remain a client of Halcyon HealthCare and for a period thereafter in accord with the rules of our regulators, the FCA and the ICO.
- Your payment data will not be retained by us after your policy has been accepted by your insurer.

## Your Rights

You have the right to review the data that we hold about you and you have the right to request that your data be removed from our systems, if there is no good reason for us to continue to hold it and subject to the rules of our regulators.

## Contact

Please address any questions you may have regarding our privacy policy to [advice@halcyon-healthcare.co.uk](mailto:advice@halcyon-healthcare.co.uk).

Halcyon HealthCare is authorised and regulated by the Financial Conduct Authority Reg. No. 308569  
Halcyon HealthCare is registered with the Information Commissions Office Reg. No.Z7912457.