

Version 1.3

Last updated: 21/02/26

About us

We BareRock Limited (also referred to as “we”, “us”, or “our”) are a registered company in England (Company no. 12667957). **Our** registered address is 2nd Floor, 4C Albion Street, Halifax, HX1 1DU. We are registered with the ICO as a data controller under registration number ZB107713.

The purpose of this notice

This Notice is designed to help you understand what kind of information we collect in connection with our products and services and how we’ll process and use this information. In the course of providing you with products and services we’ll collect and process information that is commonly known as personal data.

This Notice describes how we collect, use, share, keep and safeguard personal data.

This Notice sets out your individual rights; we explain these later in the Notice but in summary these rights include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.

What is personal data?

Personal data is information relating to an identified or identifiable natural person. Examples include an individual’s name, age, address, date of birth, their gender and contact details.

Personal data may contain information which is known as special categories of personal data. This may be information relating to an individual’s health, racial or ethnic origin,

political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to or sexual orientation.

Personal data may also contain data relating to criminal convictions and offences.

For the purposes of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data, where we are legally required to comply with specific data processing requirements.

Personal data we collect

In order for us to arrange and administer insurance for you, we'll collect and process personal data about you & your firm. We'll also collect your personal data where you ask for information about our services, customer events, promotions and campaigns.

We may also need to collect personal data relating to others to arrange and administer insurance. In most circumstances, you'll give us this information. Where you disclose the personal data of others, you must make sure you're entitled to do so.

You may give us personal data when completing online quote or contact forms, when you contact us via the phone, when writing to us directly or where we give you paper based forms for completion or we complete a form with you.

We'll share your personal data within our firm, group of companies, including affiliates, subsidiaries and with business partners. This is normal practice within the insurance industry where it's necessary to share information to place, quantify and underwrite risks, to assess overall risk exposure and to process claims. It's also necessary to determine the premium payable and to administer our business.

We also share personal data with authorised third parties, this is necessary where we need to do so by law, where we need to administer our business, to quote for, source, place and administer your insurances, including arranging insurance premium finance, to perform underwriting activities and to process claims. Some examples of these are:

- Insurers
- Underwriters

- Premium finance providers
- Credit reference agencies
- Debt recovery agencies
- Claims handling companies
- Loss adjusters
- Insurance brokers
- Reinsurers
- Regulators

We'll also collect electronic personal data when you first visit our website where we'll place a small text file that is commonly known as a 'cookie' on your computer. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating our website and when using features. For more information, please see our Cookie Policy.

We may record your communications with us when contacting our customer care, complaints and other customer focused functions.

Where we collect data directly from you, we are considered to be the controller of that data i.e. we are the data controller. Where we use third parties to process your data, these parties are known as processors of your personal data. Where there are other parties involved in underwriting or administering your insurance, they may also process your data in which circumstance we'll both be a data controller of your personal data.

A data 'controller' means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data 'processor' means the individual or organisation which processes personal data on behalf of the controller.



More simply put:

When we get information directly from you, we are the ones responsible for that data, and we call this the data controller. If we involve other companies to handle your information, they are called data processors.

Sometimes, other authorised parties may also be involved in managing your insurance, and in such cases, both they and we will be considered data controllers for your personal information.

As a provider of insurance services, we'll process the following categories of data:

- Personal data such as an individual's name, address, date of birth, gender, contact details and details of historic claims
- Data relating to your firm to enable us to undertake credit and sanction checking

If you don't agree to the collection, sharing and use of your personal data we may be unable to provide you with our products and services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

If you need more information about our insurance processes or more specific information about how we gather personal data and who we share it with, please get in touch with our data privacy representative by emailing info@barerock.group.



More simply put:

We might not be able to offer you our products and services if you don't agree to us collecting, sharing, and using your personal information.

Why do we need your personal data?

We'll use your personal data for the performance of our contract with you, to quote for and provide you with insurance products and services, to process claims and renewals, to administer your policy and our business, to respond to any requests from you about services we provide and to process complaints. We'll also use your personal data to manage your account, perform statistical analysis on the data we collect, for financial planning and business forecasting purposes and to develop new and market existing products and services.

We'll use the special category data we collect about you for the performance of our contract with you which is deemed to be necessary for reasons of substantial public interest. This allows us to quote for and provide you with insurance products and services, to process claims and renewals and to administer your policy.

In purchasing our products and services you should understand that you're forming a contract with us. If you contact us for a quote or ask for details on the services we provide, we consider ourselves as having a legitimate business interest to give you more information about our services.

In some situations, we may ask for your consent to market our products and services to you. Where we need consent, your rights and what you're consenting to will be clearly communicated to you. Where you give consent, you can withdraw this at any time by contacting our data privacy representative.

We keep your personal data only for as long as necessary under our document retention policy and keeping to legal, regulatory, tax or accounting requirements, or for dealing with complaints, legal challenges or prospective litigation.

For example, where you buy our insurance product, information will be held for the duration of your insurance cover and a period of several years after the end of our relationship. We keep information after our relationship ends to comply with applicable laws and regulations and for use in connection any legal claims brought under or in connection with your policy. Where you have started an application for insurance, we'll keep your data to save you time for future quotes.

Where you have contacted us for details of our services and products, we'll keep your personal data for one year and one month. Where you make a complaint, we'll keep the data for six years. Where you or law enforcement agencies inform us about any active investigation or potential criminal prosecution, we'll comply with legal requirements when retaining this data.

The retaining of data is necessary, where needed, for contractual, legal or regulatory purposes or for our legitimate business interests and product development and marketing purposes.

Sometimes we may need to keep your data for longer, for example if we are representing you or defending ourselves in a legal dispute or as needed by law or where evidence exists that a future claim may occur.

Please contact our data privacy representative if you object to the use of, or you have any questions relating to the use of, your data, the retention of your personal data. You can opt out of receiving marketing by emailing info@barerock.group.

International transfers of personal data

Most data processing for BareRock services takes place within the UK, however when we use AI tools, personal data may be processed and stored in the United States under Standard Contractual Clauses that ensure appropriate data protection safeguards.

We use AI tools for document production, risk analysis, trend analysis, and production of management information. We maintain human oversight of all AI processing and do not use AI for automated decision-making that significantly affects you.

We have conducted a Transfer Risk Assessment and documented appropriate protections for international transfers. Personal data is not used to train AI models.

We share your personal data within the BareRock Holdings Group, which is based within the UK. However, some of our External Third Parties are based outside of the UK, for example, Microsoft, LinkedIn and AWS.



More simply put:

When you buy our insurance, we'll keep your information throughout the duration of your coverage and for several years after our relationship ends.

We do this to comply with laws, regulations, and to handle any legal claims related to your policy.



More simply put:

We use a secure AI assistant to help with business tasks like creating documents and analysing risks. Some of your information might be processed in the United States, but we've made sure strong protections are in place through legal contracts and security measures which are equivalent to those in place in the UK.

We will only transfer personal data outside the UK if permitted by UK GDPR or the Data Protection Act 2018.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we use specific contracts approved for use in the UK which give personal data the same protection it has in the UK and/or we require specific technical and organisational measures to be implemented to safeguard your personal data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Your rights

People have specific legal rights concerning the use of their personal information. These rights include the ability to know what personal data is being held about them, why it's collected and used, who it's shared with, where it's stored, and the right to object to its use. They can also request corrections to inaccurate data, obtain copies of their information, and limit how it's processed. Additionally, individuals have the right to ask for their personal data to be deleted.

These rights are known as Individual Rights under the Data Protection Act 2018. Here's a list of these rights:

- The right to be informed about the personal data being processed;
- The right of access to your personal data;
- The right to object to the processing of your personal data;
- The right to restrict the processing of your personal data;
- The right to rectification of your personal data;
- The right to erasure of your personal data;
- The right to data portability (to receive an electronic copy of your personal data);
- Rights relating to automated decision making including profiling.

Individuals can use their Individual Rights whenever they want. By law, we won't charge a fee to handle these requests. However, if we find a request to be repetitive, unfounded, and/or excessive, we may charge a reasonable administration fee.

In exercising your Individual Rights, it's essential to know that in certain cases, we might not be able to fulfill your request entirely. For example, if you ask us to delete all your personal data, we may need to retain some information for reasons like taxation, crime prevention, and compliance with regulatory or legal requirements.

You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

The flow of data within the insurance sector is complex and we ask you to keep this in mind when exercising your 'rights of access' to your information. Where we may be reliant on other organisations to help satisfy your request this may impact on timescales.

If you need more information on your Individual Rights or you wish to exercise your Individual Rights, please contact our data privacy representative by emailing info@barerock.group or by writing to 2nd Floor, 4C Albion Street, Halifax, HX1 1DU.

Protecting your data

We'll take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data, including when sharing your data within our firm, group of companies, including affiliates, subsidiaries and authorised third parties.

Data Privacy Representative

To make sure data privacy and protection has appropriate focus within our organisation we have a Data Privacy Representative who reports to our senior management team. The Data Privacy Representative's contact details are: John Netting, john@barerock.group

Complaints

If you're unhappy with how we handle your personal data, please get in touch with our **data privacy representative**. You also have the right to file a complaint with the UK's data protection supervisory authority, the Information Commissioner's Office (ICO). You can contact ICO via its website which is <https://ico.org.uk/concerns/>, by [live chat](#) or by calling their helpline on 0303 123 1113.

How to contact us

If you have any questions about this Notice, the use of your data or your Individual Rights please contact our data privacy representative at **2nd Floor, 4C Albion Street, Halifax, HX1 1DU** or by emailing info@barerock.group or by phoning **020 3984 7340**.

Changes to Our Privacy Policy

We may change, update, or modify this Policy without giving you prior notice. Any changes we make will take effect immediately once we post the updated Policy. However, if we make material changes to this Policy we'll notify you by means of a prominent notice on the Website before the change becomes effective, or in other ways as needed by law. Please review the Policy whenever you access or use this Website.

To the extent any provision of this Policy is found by a competent tribunal to be invalid, illegal or unenforceable, such provision shall be deemed to be severed to the extent necessary, but the remainder shall be valid and enforceable.