



JOHN CLARK INSURANCE SERVICES

PRIVACY POLICY

Updated: 14th September 2026

1. About Us

John Clark Insurance Services is a trading name of Provenance Insurance Brokers Ltd, which is authorised and regulated by the Financial Conduct Authority in respect of General Insurance business. Our Firm Reference Number is 804047, which can be checked on the Financial Services Register at www.fca.org.uk. Provenance Insurance Brokers Ltd is registered in England and Wales, Company Number 11131702.

John Clark LTD and Provenance Insurance Brokers Ltd are separate and independent businesses. They are not part of the same corporate group and operate under a commercial introducer partnership arrangement. Provenance Insurance Brokers Ltd may operate under introducer arrangements with other businesses from time to time.

Provenance Insurance Brokers Ltd (**Provenance**) is committed to protecting your privacy and ensuring your personal data is handled securely. We comply with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, as upheld by the **Information Commissioner's Office (ICO)**. Our processing of personal data is conducted lawfully, fairly, and transparently.

1a. Definitions

For the purposes of this Privacy Notice:

Personal data means any information that identifies or relates to an identifiable living individual.

Special category data means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data, health data, sex life or sexual orientation.

Data controller means the organisation that determines how and why personal data is processed.

Third party means any organisation or individual other than you or us.

1b. Data Controller & Trading Status

Provenance Insurance Brokers Ltd is the data controller responsible for your personal data.

Where we operate under different trading names, we hold the appropriate regulatory permissions to do so. A full list of our permissions and trading styles can be viewed on the Financial Services Register.

2. What Information We Collect & Why

We collect personal data to provide insurance brokerage services and ensure regulatory compliance. The types of data we collect include:

- **Personal Identifiers:** Name, address, email, phone number.
- **Financial Information:** Bank details, payment records.

- **Insurance Details:** Existing policies, claims history, coverage needs.
- **Sensitive Data (if required):** Medical conditions or criminal records (only when necessary for policy arrangements).

We collect this data through:

- Website forms and customer interactions.
- Third party lead generators who have obtained your consent to share your details with insurance intermediaries such as us.
- Public records to verify information where applicable.

If you use third-party links on our website, please be aware that their Privacy Policy will also apply, as we act only as an introducer.

3. How We Use Your Information

Your personal data is used for the following purposes:

- **Insurance Brokerage Services** – To provide policy advice, arrange cover, and liaise with insurers.
- **Customer Support** – To handle queries, claims, and renewals.
- **Regulatory Compliance** – To fulfil legal obligations under the **FCA and ICO**.
- **Marketing & Communication** – To provide updates about new products or services (where consent has been given).
- **Fraud Prevention & Security** – To detect and prevent fraud or financial crime.

3a. Lawful Basis for Processing

We process personal data only where we have a lawful basis to do so. These include:

Performance of a contract:

Where processing is necessary to provide quotations, arrange insurance, administer policies, manage claims, or provide customer support.

Legal obligation:

Where processing is required to comply with regulatory, legal, or statutory duties including FCA and data protection requirements.

Legitimate interests:

Where processing is necessary for fraud prevention, financial crime controls, business administration, risk management, service improvement, and complaint handling, provided this does not override your rights.

Consent:

Where you have given clear consent, particularly for marketing communications. You may withdraw consent at any time.

4. Website Tracking & Cookies Policy

4a. What Are Cookies?

Cookies are small text files placed on your computer or device when you visit a website. They help websites remember your preferences, improve user experience, and provide insights into website performance.

4b. Types of Cookies We Use

We use the following types of cookies on our website:

- **Strictly Necessary Cookies:** These are essential for the operation of our website, such as allowing secure logins and protecting against fraud. Without these cookies, the website cannot function properly.
- **Performance & Analytics Cookies:** These cookies collect anonymous data on how visitors interact with our website. We use **Google Analytics** to track user activity, which helps us improve website usability. These cookies do not store personal information.

- **Functionality Cookies:** These allow the website to remember choices you make, such as your language preferences or login details.
- **Targeting & Advertising Cookies:** These cookies track browsing habits to provide targeted advertising. We may work with third-party advertisers who use cookies to display relevant ads.

4c. Managing Cookies

You have the option to manage your cookie settings:

- **Accept All Cookies:** Allows full website functionality.
- **Reject Non-Essential Cookies:** Disables analytics and advertising cookies but keeps essential ones active.
- **Customise Preferences:** Adjust individual cookie settings in your browser.

You can control and delete cookies via your browser settings:

- **Google Chrome:** [Manage Cookies](#)
- **Mozilla Firefox:** [Manage Cookies](#)
- **Microsoft Edge:** [Manage Cookies](#)
- **Safari:** [Manage Cookies](#)

Cookies are placed only after you have provided consent via our cookie consent tool except for strictly necessary cookies required for the operation of the site.

5. Who We Share Your Data With

We only share your personal data where necessary, including:

- **Insurers & Underwriters** – To arrange policies.
- **Regulatory Bodies (FCA, ICO)** – If legally required.
- **Fraud Prevention Agencies** – If fraud is suspected.
- **Credit Providers** – If financing options are used.
- **Third-Party Professionals** (e.g., solicitors, financial advisors) – Only if requested.

We are supported by Lloyd & Whyte Group Limited, which provides certain operational, compliance, and business support services.

Where necessary, limited personal data may be shared with Lloyd & Whyte Group Limited or processed by them on our behalf, subject to appropriate contractual and data protection safeguards, and only for the purposes of supporting the operation of our business. This does not involve marketing to you by Lloyd & Whyte Group Limited or the provision of insurance or other services to you by them.

5a. Automated Processing and Profiling

Some of your personal data may be processed using automated systems, including for quotation, risk assessment, fraud detection, eligibility checks, or pricing support.

We apply appropriate safeguards to ensure automated processing is fair and proportionate. Where automated decision making materially affects pricing or eligibility you have the right to request human review and to challenge the decision where permitted by law.

5b. Industry Databases and Information Sharing

Where relevant to the insurance being arranged, we may share or verify information using industry databases and bodies, including insurers' claims databases, fraud prevention systems, licensing authorities, and motor insurance databases.

These checks are carried out to assess risk, validate information, prevent fraud, and administer policies and claims lawfully.

We **do not** sell personal data to third parties for marketing purposes.

5c. Introducer Relationship – John Clark Motor Group

Where you have been introduced to us by John Clark Motor Group, we may share limited personal data with them strictly for the purposes of referral validation, commission reconciliation, compliance oversight, and performance reporting in connection with the introducer arrangement.

The information shared will be proportionate and limited to what is necessary to administer the introducer arrangement.

John Clark Motor Group does not provide insurance advice via John Clark Insurance Services, arrange insurance, or process your personal data for independent marketing purposes unless you have separately consented to receive communications from them. All insurance servicing is provided by Provenance Insurance Brokers t/as John Clark Insurance Services.

6. Data Security & Retention

We implement strict security measures to protect personal data from unauthorised access, loss, or misuse.

- **Retention Period:** Data is stored for **six years** after policy arrangement (in line with FCA regulations).
- **Secure Storage:** We apply appropriate technical and organisational measures to protect personal data, including encryption and access controls. Data is hosted securely by us or our service providers.

6a. International Transfers

Your personal data is primarily stored and processed within the United Kingdom or European Economic Area.

We do not routinely transfer personal data outside the United Kingdom.

Personal data may be processed outside the UK or European Economic Area by third-party service providers acting on our behalf, including where we use externally hosted systems or platforms, or where required in connection with certain insurance arrangements or claims.

Where this occurs, we ensure that appropriate safeguards are in place in accordance with UK data protection law, including contractual protections and adequacy arrangements.

6b. Retention Rationale

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, regulatory, and business requirements.

In most cases, client data is retained for six years following the end of the relevant policy or business relationship. This allows us to respond to claims, complaints, disputes, and regulatory requests.

In some circumstances, data may be retained for longer, for example where required for ongoing claims, legal proceedings, or occurrence-based insurance policies. In other cases, data may be retained for a shorter period, such as where a quotation does not result in a policy being taken out.

7. Your Data Rights

Under **UK GDPR**, you have the right to:

- **Access** your personal data (Subject Access Request).
- **Rectify** inaccurate or incomplete data.
- **Request Erasure** where applicable.
- **Restrict Processing** under certain conditions.
- **Object** to processing for direct marketing.
- **Withdraw Consent** at any time for marketing purposes.

To exercise these rights, please email: contact@john-clarkinsurance.co.uk

7a. Vulnerable Customers

Where we identify that a customer may be vulnerable, we take additional care to ensure personal data is handled sensitively and appropriately, in line with regulatory expectations and our internal policies.

8. Complaints & ICO Contact Details

If you have concerns about how we handle your data, you can contact us directly. If unresolved, you may raise a complaint with the **Information Commissioner's Office (ICO)**:

- **Website:** www.ico.org.uk
 - **Phone:** 0303 123 1113
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9. Marketing Scope

Marketing communications will only be sent by us, or where permitted by law and where you have provided consent or have not opted out.

You may opt out of marketing communications at any time.

10. Updates to This Privacy Notice

We regularly review our privacy policy. Any significant changes will be communicated.

11. Contact Us

For any questions regarding this Privacy Notice:
Provenance Insurance Brokers t/as John Clark Insurance Services
34 Lime Street, Leadenhall, London, EC3M 7AT

- **Phone:** 0203 808 9863
- **Email:** contact@john-clarkinsurance.co.uk
- **Website Contact Form:** <https://john-clarkinsurance.co.uk/contact-us/>

John Clark Insurance Services

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