

Data protection and privacy notice

Who are we?

We are Bartlett Group (Holdings) Limited (company registration number 00945137) and subsidiary companies (referred to as “Bartlett”, “we”, “us” or “our”). We are the providers of the following websites:

www.bartlettgroup.com

www.arborisk.co.uk

www.comparecreditinsurance.co.uk

Our address is: Broadway Hall, Horsforth, Leeds, LS18 4RS.

In the UK, Bartlett group companies are registered with the Information Commissioner’s Office as Data Controllers with the following registration numbers:

Bartlett & Company Limited Z8268752

Bartlett Wealth Management Limited Z826877X

Bartlett Employee Benefits Limited ZB818943

Bartlett Underwriting Limited ZB929393

We are committed to protecting and respecting your privacy. This Notice explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. We will process your personal information on the basis of “Legitimate Interests” and “Explicit Consent” (as defined by the Data Protection Act 2018 in the UK or the General Data Protection Regulation in the EEA).

Bartlett & Company Limited is licensed by the Jersey Financial Services Commission (“JFSC”) to undertake general insurance mediation business in Jersey. We process the personal data of individuals located in Jersey, in accordance with the Data Protection (Jersey) Law 2018 (DPJL). Your personal data may be processed in the UK or via cloud services hosted outside Jersey. We ensure that any international transfers of Jersey residents’ data comply with DPJL requirements regarding adequate safeguards.

Further information about Bartlett Wealth Management’s data protection and privacy provision can be found [here](#)

What is personal data?

Personal data is information which relates to an individual and from which he or she can be identified either directly or indirectly through other data which the firm has or is likely to have in its possession. These individuals are sometimes referred to as data subjects. Personal data does not include information about companies and organisations.

How do we collect information from you?

We obtain information about you when you use our websites, contact us about products and services or engage with us to renew existing products or services. We may also collect data, with your consent via a letter of authority, from your existing product providers.

Where relevant, we also collect special category data such as details regarding your health, credit history, and/or data about criminal convictions.

To ensure we carry out your instructions accurately and to help us to continually improve our service, we record and may monitor your telephone communications or conversations with us. When you attend a video meeting (e.g. via Microsoft Teams) we may record the meeting. During a recorded meeting we will collect your personal data such as your name, photo and your contributions to the meeting. Video images will also be captured where your camera is enabled, and we may use AI software (such as the Microsoft Team transcription and summation facilities) to transcribe the meeting and/or create meeting minutes.

We also work with third parties including regulators and business partners. We may receive information about you from them.

Recording telephone calls and video meetings

To ensure we carry out your instructions accurately, and to help us to continually improve our service and in the interests of security, we will record and may monitor your telephone communications, conversations and video meetings with us. We may retain copies of our telephone recordings and video meetings in line with the Bartlett Group Data Retention Policy (see 'Data Retention').

How will we use the information about you?

- We will use your personal information to administer your account and to provide the products and services you have requested from us, to provide advice to you and to complete transactions on your behalf. We analyse and assess your data in order to maintain the suitability of our advice and provide you with ongoing services.
- We may share your information with, and obtain information about you from, credit reference agencies or agencies responsible for verifying an individual's claims history and/or the prevention of fraud and financial crime. Information provided by you may be put onto a register of claims and shared with other insurers to prevent fraudulent claims.
- Any information you give to us, including special category data such as health and medical records, may be disclosed to selected third parties for the purposes of finding the best available product for you and for processing any application you make.
- We will disclose information held about you to insurance companies, other product and platform providers, researchers, compliance consultants and other professional advisors or anyone we may engage to process your application or provide professional services to you on our behalf.
- We may be required to share your information with regulatory authorities and/or fraud prevention agencies, to meet our responsibilities under the law.
- We will use your information to notify you of changes to our services which are necessary and relevant to the products you have with us along with information and communications in relation to additional products we feel may be of interest.
- We will send you marketing communications subject to appropriate consent being provided.
- We will seek your views or comments on the services we provide.

- We will not share your personal information with any companies outside the Bartlett Group for the purposes of marketing.

Retention

We will retain your data in line with the Bartlett Group Data Retention Policy. We have different retention periods dependant on the requirements of each business division. We can provide details of specific retentions periods relevant to your data.

Please submit all requests to dataprotection@bartlettgroup.com.

Use and storage of your information overseas

Your information may be transferred to, stored, and processed outside, the United Kingdom or European Economic Area (EEA). We will not transfer your information outside the UK or the EEA unless it is to a country which is considered to have equivalent data protection laws or where we have taken all reasonable steps to ensure the firm has suitable standards in place to protect your information. Transfers between the UK and the EEA are subject to Standard Contractual Clauses (SCCs) between the relevant parties.

Your choices

Your personal information may be accessed by companies within the Bartlett Group to provide information regarding services we offer.

You have a choice about whether or not you wish to receive information from us. If you do not want to receive marketing communications from us about the work we do for other clients and information about our products and services, please ensure that your preferences are provided to your Bartlett representative.

You can change your marketing preferences at any time by contacting us by email or directly contacting your Bartlett representative:

Bartlett Group Ltd, Broadway Hall, Horsforth, Leeds LS18 4RS

Telephone Number: +44 (0)845 605 4155

Email: dataprotection@bartlettgroup.com

Your rights

You have the right to request deletion of information where:

- personal data is no longer necessary in relation to the purpose for which it was originally collected and processed;
- you are withdrawing your specific consent;
- you object to the processing of the data and there is no overriding legitimate interest for continuing the processing;
- the personal data was unlawfully processed; or
- the personal data has to be erased in order to comply with a legal obligation.

The request to delete your personal data can be refused; should this situation arise, we will provide you with the specific rationale to support the decision.

You have the right to restrict processing of personal data under the following circumstances:

- if there is any discrepancy in respect of your personal data, we will restrict the processing until we have verified the accuracy;
- if there is any individual objection to the processing of personal data if data processing isn't being carried out for the original purpose(s) for which it was collected; or
- if we no longer need the personal data but you require the data to establish, exercise or defend a legal claim.

Access to your information and correction

You have the right to access information we hold about you. You can request a copy of these records by contacting our Head Office. If any of the information we hold is incomplete or inaccurate, please tell us and we will correct it. Contact details are as follows:

Bartlett Group Ltd, Broadway Hall, Horsforth, Leeds, LS18 4RS

Telephone Number: +44 (0)845 605 4155

Email: dataprotection@bartlettgroup.com

We will endeavour to provide you with requested information within one month. We can impose a charge for this information if the request is manifestly unfounded or excessive.

If we refuse a request for information, we will advise you accordingly within one month.

Data complaints and concerns

If you have any concerns about how your personal data is being used or the refusal of a request for information, you have the right to raise a complaint with us in the first instance. Data concerns should be emailed to: dataprotection@bartlettgroup.com in the first instances

We will acknowledge and investigate your complaint promptly and fairly, in line with the Data (Use and Access) Act and applicable data protection legislation.

Where possible, we will seek to resolve any issues directly with you. If you are not satisfied with our response, or believe we have not handled your personal data lawfully, you have the right to lodge a complaint with the relevant Data Protection Authority (DPA).

The details are listed below for your information:

- If you are a UK resident or if your complaint relates to a Bartlett UK company, please contact the Information Commissioner's Office (ICO) <https://ico.org.uk/concerns/> ICO Helpline: 0303 123 1113
- If your complaint relates to Bartlett & Co. GmbH, you may contact the Hamburgische Beauftragte für Datenschutz und Informationsfreiheit ('the Hamburg Commissioner for Data Protection and

Freedom of Information'). The details are listed below for your information: <https://datenschutz-hamburg.de/> Tel: 040/428 54 – 4040, EEA residents outside of Germany may also contact their national DPA.

- If you are a Jersey resident, you may contact the Jersey Office of the Information Commissioner (JOIC): <https://jerseyoic.org/> | Phone: +44 (0)1534 716530

Our liability to you

Security precautions are in place to protect the loss, misuse, or alteration of your information. When you provide us with personal information, we take steps to ensure that it is treated securely. Any sensitive information, including credit or debit card details, are encrypted to ensure protection. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems.

Changes to our data protection and privacy notice

We may change this Notice from time to time. This Notice was last updated in May 2026.

Third party Links

Our website may contain links to other websites run by other organisations. External software such as Microsoft Teams has its own privacy policy and practices which will apply. This Data Protection and Privacy Notice applies only to our website, so we encourage you to read the privacy statements on any other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

We do not endorse the content of any external sites, and we are not responsible or liable, directly, or indirectly, for any loss however caused to you by your use of any external site.

Miscellaneous

The information on our website is for residents of the UK and EEA only. These Terms shall be governed by and construed in accordance with English law and the English courts shall have jurisdiction over any disputes between us.

Contact us

Any questions regarding this Notice and our privacy practices should be sent by email to: dataprotection@bartlettgroup.com or alternatively please contact us at:

Bartlett Group Ltd, Broadway Hall, Horsforth, Leeds LS18 4RS
Telephone number: +44 (0)845 605 4155

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