

# **Privacy Policy**

Last updated 3<sup>rd</sup> February 2025

## This Privacy Policy tells you what data we collect, why we collect it and what we do with it. You can also find information on the controls you have to manage your data within these pages.

#### **Contents**

Section	Page Number
1. Our Privacy Principles	3
2. Where we might collect your personal data from	3
3. The data we may collect about you (your personal data)	3
4. How do we use your personal information?	4
5. Who do we share your personal information with?	9
6. How long do we keep records for?	10
7. Your Rights	10
8. Marketing	12
9. Download a copy of the Privacy Policy	12
10. Identities of data controllers and data protection contacts	12
11. Regent Facilities Limited Company Details	13
12. Regent Facilities Limited privacy declaration	14

Regent Facilities Limited operate under a number of different trading names, including Mobile Homes Insurance Service, Horse and Rider Insurance Direct and Regent Insurance Group. We are committed to ensuring your privacy and personal information is protected. For the purposes of this Privacy Policy, references to "we" or "us" shall refer to Regent Facilities Limited and their associated trading names.

This Privacy Policy should be brought to the attention of any party who is included in your Policy, where they have given you consent to act on their behalf.

By providing your personal information or the personal information of someone included in your policy, you acknowledge that we may use it only in the ways set out in this Privacy Policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

From time to time we may need to make changes to this privacy policy, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up to date privacy policy.

## 1. Our Privacy Principles

When we collect and use your personal information, we ensure we look after it properly and use it in accordance with our privacy principles set out below, keep it safe and will never sell it.

Our Principles are:-

- 1. Personal information you provide is processed fairly, lawfully and in a transparent manner
- 2. Personal information you provide is collected for a specific purpose and is not processed in a way which is incompatible with the purpose which we collected it
- 3. Your personal information is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
- 4. Your personal information is kept accurate and, where necessary kept up to date
- 5. Your personal information is kept no longer than is necessary for the purposes for which the personal information is processed
- 6. We will take appropriate steps to keep your personal information secure
- 7. Your personal information is processed in accordance with your rights
- 8. We may need to transfer your data to insurance market participants or their affiliates or subcontractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the GDPR. If you would like further details of how your personal data would be protected if transferred outside the EEA, please contact the data protection contact detailed in section 10
- 9. We do not sell your personal information and we also do not permit the selling of customer data by any companies who provide a service to us

## 2. Where we might collect your personal data from

Your personal information is collected to allow us to administer an Insurance Policy for you through our Underwriters. There are a variety of ways we collect this information, primarily directly from you during our correspondence with you, but also from Third Parties in specific circumstances.

We collect personal information directly from you:-

- via enquiry and claim forms;
- via feedback forms, forums and social media;
- when you purchase any of our products or services;
- through quotes and application forms;
- via our telephone calls with you, which may be recorded;
- via website cookies;
- any other occasion when you provide your details to us either online or offline

We collect personal information from Third Parties in the following ways:-

- directly from an individual who has a policy with us under which you are insured, for example you are a named rider on an Equine Policy
- from credit reference agencies who will supply us with information, including information from the Electoral Register and credit information. Please note that the agencies may record details of the search whether or not your application proceeds;
- from social media where fraud is suspected; and
- via other third parties including your family members where you may be incapacitated or unable to provide information relevant to your policy; medical professionals and hospitals; aggregators; third parties who assist us in checking that we are permitted to make claims payments; and third parties such as companies who provide consumer classification for marketing purposes e.g. market segmentation data

### 3. The data we may collect about you (your personal data)

The information that we collect will depend on our relationship with you. Where other people are named on your policy, we may ask you to provide the information below in relation to those people too, if this is relevant to your insurance.

Data is categorised under Personal Data and Special Categories of Personal Data (previously referred to as sensitive data). The following are examples of what information we collect about our customers:-

#### Personal data

- Individual details Name, address, other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
- Identification details Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number
- Financial information such as bank details and Debit Card details
- Risk details Information relevant to your insurance policy such as details about your property, previous policies or claims, recent damage, your occupation status, destination, planned activities and dates of travel, all dependant on which product it is you are discussing with us. This may also include data relating to criminal convictions or special categories of personal data e.g. health data.
- Policy information Information about the quotes you receive and policies you take out
- Credit and anti-fraud data Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you
- Previous and current claims Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports
- details of bankruptcies and other financial sanctions such as HMRC investigations
- your marketing preferences

#### Special categories of personal data

Certain categories of personal data which have additional protection under the GDPR. The
categories are health, criminal convictions, racial or ethnic origin, political opinions, religious
or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning
sex life or sexual orientation

## 4. How do we use your personal information?

We mainly use your personal information in association with our Underwriters to provide you with an insurance policy and to provide you with the right services based on your situation. However, there are a number of other reasons why we use your personal information.

We may process your personal information for a number of different purposes and these are set out in more detail further down in this section. Under data protection laws we need a reason to use and process your personal information and this is called a legal ground. We have set out below the main reasons why we process your personal information and the applicable circumstances when we will do so. When the personal information we process about you is classed as Special categories of personal data (such as details about your health or sexual orientation) we must have an additional legal ground for such processing, or where appropriate, we apply a specific exemption for Insurance purposes.

- Processing is necessary for the provision of your insurance policy and services, such as
  assessing your application and setting you up as a policyholder, administering and managing
  your insurance policy, providing all related services, providing a quote, handling and paying
  claims and communicating with you. In these circumstances, if you do not provide such
  information, we will be unable to offer you a policy or process your claim.
- Where there is a legal or regulatory obligation to use such personal information, for example, when our regulators, the Prudential Regulatory Authority, (PRA), the Financial Conduct Authority (FCA) and our data protection regulator, the Information Commissioner's Office (ICO) wish us to maintain certain records of any dealings with you.
- Where your personal information is needed to establish, exercise or defend legal rights, for example when Insurers or us are faced with any legal claims or where we want to pursue any legal claims ourselves.
- Where your personal information is needed for reasons of substantial public interest, such as investigating fraudulent claims and carrying out fraud, credit and anti-money laundering checks.
- Where there is a specific legal exemption to process sensitive personal data for insurance purposes. This exemption applies where your information is processed as an essential part of the insurance cover, for example health data.
- Where you have provided your consent to our use of your personal information. We will usually only ask for your consent in relation to processing your special categories of personal data or when providing marketing information to you (including information about other products and services). This will be made clear when you provide your personal information. If we ask for your consent we will explain why it is necessary. Without your consent in some circumstances, it may not be possible to provide cover or handle claims or you may not be able to benefit from some services. Where you provide sensitive personal information about a third party we will ask you to confirm that the third party has provided his or her consent for you to act of their behalf.
- Where we have appropriate legitimate business needs to use your personal information such
  as maintaining our business records, developing and improving our products and services, all
  whilst ensuring that such business need does not interfere with your rights and freedoms and
  does not cause you any harm.

The table below outlines the categories of personal data you may provide us with as a client to administer your Insurance Policy. Each Purpose may have more than one Legal Ground stated and this is because we have one specific Legal Ground applicable for each individual category of data. If you wish to have anything further elaborated for you, please contact us and we will answer any of your queries. Regent Facilities Limited is committed to providing information about our processing of your personal data in a fair, lawful and transparent manner.

Purpose	Categories of Data	Legal Grounds
Quotation/Inception: Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks  Disclosures: Banks	Personal data:	Personal Data:  Performance of the contract with you  Compliance with a legal obligation  Legitimate interests (to ensure that the client is within our acceptable risk profile  To assist with the prevention of crime and fraud
	<ul><li>Special categories of personal data:</li><li>Credit and anti-fraud data</li></ul>	<ul> <li>Special categories of personal data:</li> <li>In the substantial public interest</li> <li>Consent</li> </ul>

Quotation/Inception: Evaluating the risk to be covered and matching to appropriate Policy/Premium  Quotation/Inception and Policy	Personal data:	Personal Data:
Administration: Collection or refunding of Premium	Financial information	Legitimate interests (to recover debts due to us)
Policy Administration: General client care, including communicating with you regarding administration and requested changes to the Insurance Policy. Sending you updates regarding your Insurance Policy.	Personal data:	Personal Data:
Claims Processing: Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks	Personal data:	Personal Data:      Perform contract     Legitimate interests (to assist our clients in assessing and making claims)
Disclosures:      Claims     handlers     Solicitors     Loss adjustors     Experts     Third parties     involved in the     claim	Special categories of personal data:	Special categories of personal data:
Claims Processing: Defending or prosecuting legal claims	Personal data:     Individual details     Identification details     Financial information     Policy information	Personal Data:
Disclosures:      Claims     handlers     Solicitors     Loss adjustors     Experts     Third parties	Special categories of personal data:	Special categories of personal data:

involved in the		
claim  Claims Processing: Investigating and prosecuting fraud  Disclosures:  Claims handlers Solicitors Private investigators Police Experts Third parties involved in the investigation or prosecution Other insurers Anti-fraud databases	Personal data:     Individual details     Identification details     Financial information     Policy information  Special categories of personal data:     Credit and anti-fraud data     Health data     Criminal records data     Other sensitive data     Credit and anti-fraud data     Risk details     Previous claims     Current claims	Personal Data:
Renewals: Contacting you in order to renew the insurance Policy	Personal data:	Personal Data:     Perform contract     Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies)     Consent  Special categories of personal data:
	Risk details     Previous claims     Current claims	Consent
Throughout the Insurance Lifecycle: Transferring books of business, company sales and reorganisations  Disclosures:  Courts	Personal data:	Personal Data:      Legitimate interests (to structure our business appropriately)     Legal obligation  Special categories of personal data:     Consent
Purchaser	<ul><li>Risk details</li><li>Previous claims</li><li>Current claims</li></ul>	Substantial Public interest
Throughout the Insurance Lifecycle: General risk modelling & underwriting	Personal data:	Personal Data:  • Legitimate interests (to build risk models that allow placing of risk with appropriate insurers)  Special categories of personal data:
	<ul> <li>Credit and anti-fraud data</li> <li>Risk details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	Consent

Throughout the Insurance Lifecycle: Complying with our legal or regulatory obligations  Disclosures: PRA, FCA, ICO and other regulators Police Other insurers (under court order) Insurance Fraud	Personal data: <ul> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> <li>Marketing data</li> </ul> <li>Special categories of personal data:         <ul> <li>Credit and anti-fraud data</li> <li>Risk details</li> <li>Previous claims</li> <li>Current claims</li> </ul> </li>	Personal Data:
database		
Provide marketing information to you	Personal data:     Individual details     Marketing data	Personal Data:  • Consent

#### Legal Grounds

For processing personal data and special categories of personal data

- Perform Contract Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
- Compliance with a legal obligation Processing is necessary for compliance with a legal obligation to which we are subject.
- Protection of vital interests of you or another person Processing is necessary in order to protect the vital interests of you or of another natural person.
- In the public interest Processing is necessary for the performance of a task carried out in the public interest.
- For our legitimate business interests Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you are a child. These legitimate interests are set out next to each purpose.

For processing special categories of personal data

- You explicit consent (optional) You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting our Data Protection Contact.
- Your explicit consent (necessary) You have given your explicit consent to the processing of
  those personal data for one or more specified purposes, where we are unable to procure,
  provide or administer insurance cover without this consent. You are free to withdraw your
  consent by contacting our Data Protection Contact. However withdrawal of this consent will
  impact our ability to provide insurance or pay claims.
- Protection of vital interests of you or another person where you are unable to consent -Processing is necessary to protect the vital interests of you or of another natural person where you are physically or legally incapable of giving consent.
- For legal claims Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
- In the substantial public interest Processing is necessary for reasons of substantial public interest, on the basis of EU or UK law.

## 5. Who do we share your personal information with?

We won't share any of your personal information other than for the purposes described in this Privacy Policy. If we share anything outside the company, it'll be kept strictly confidential and will only be used for reasons that we've described.

#### Who might we disclose your personal information to?

We also disclose your information to the third parties listed below for the purposes described in this Privacy Policy. This might include:

- Your relatives, guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with you such as your insurance broker or your solicitor
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us
- Insurance partners such as Insurers, brokers, other insurers, reinsurers or other companies who act as insurance distributors
- Other third parties who assist in the administration of insurance policies such as another Insurance Company if there has been an accident which requires a claim to or from that Insurance Company
- We may share the personal information of any persons named on the policy with third parties to obtain information which may be used by us to inform our risk selection, pricing and underwriting decisions
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- Passing information to a third party for the purpose of validating your No Claims Discount (NCD) entitlement and this may be made available to other insurers
- Our third party services providers such as IT suppliers, actuaries, auditors, solicitors, marketing agencies, document management providers and tax advisers
- Other suppliers, providers of goods and services associated with this insurance and/or to enable us to deal with any claims you make
- Financial organisations and advisers
- Central Government
- The Financial Ombudsman Service and regulatory authorities such as the Financial Conduct Authority and the Information Commissioner's Office
- Loss Adjusters
- Debt collection agencies
- Credit reference agencies
- Selected third parties in connection with the sale, transfer or disposal of our business

Disclosure of your personal information to a third party outside of the company will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- we are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or Prudential Regulatory Authority / Financial Conduct Authority or Information Commissioners Office request; or
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

Some of the recipients set out above may be in countries outside of the EEA. Where we make a transfer of your personal information outside of the EEA we will take the required steps to ensure that

your personal information is protected. Such steps may include placing the party we are transferring personal information to under contractual obligations to protect it to adequate standards.

## 6. How long do we keep records for?

In most cases, we only keep your information for as long as the regulations say we have to. This is usually between three and ten years after our relationship with you ends but it will vary depending on what data we hold, why we hold it and what we're obliged to do by the regulator or the law.

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations.

## 7. Your Rights

With effect from 25th May 2018 the General Data Protection Regulation (GDPR) becomes effective in English law and your rights change. The differences are highlighted in pre and post GDPR sections below.

#### **Prior to 25 May 2018:**

At any time, you can ask us to correct your details, to stop sending you any marketing messages or for a copy of your personal information. We'll either do what you've asked, or explain why we can't – usually because of a legal or regulatory issue.

You have a number of rights in relation to our use of your personal information including the right to:

- ask us to correct your personal information if it is wrong
- object to processing of your personal information in certain circumstances
- object to direct marketing.

You can make any of the requests set out above at any time by using the contact details shown in your documentation. Please note in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

You have the right to obtain a copy of the personal information we hold about you and certain details regarding how we use it. Please note that there will be a £10 charge for this. You can make a request by contacting our office using the details shown in your Terms of Business agreement.

#### 25 May 2018 onwards:

You can ask us to do various things with your personal information. For example, at any time you can ask us for a copy of your personal information, ask us to correct mistakes, change the way we use your information, or even delete it. We'll either do what you've asked, or explain why we can't usually because of a legal or regulatory issue. For further details about your rights please see below

You have the following rights in relation to our use of your personal information.

#### The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. We will not charge you for the provision of this data.

#### The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case, please contact us by using the details shown in your documentation and you can ask us to update or amend it.

#### The right to erasure:

In certain circumstances, you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors, for example according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request. We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim under this insurance, or where we are required to keep your personal data due to legal or regulatory reasons.

#### Right to restriction of processing:

In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to process your personal information.

#### Right to data portability:

You are entitled to ask us to provide you with a copy of your personal data in a structured, commonly used and machine readable form, which will enable other organisations to use your data.

#### Right to object to direct marketing:

You can ask us to stop sending you marketing messages at any time. Please see the Marketing section for more information.

#### Right not to be subject to automated-decision making:

Some of our decisions are made automatically by inputting your personal information into a system or computer and the decision is calculated using certain automatic processes rather than our employees making those decisions. We make automated decisions in the following situations:

#### Deciding your premium

We use the personal information that you and others provide to us about you, your family, property, where you live, your claims history, and other non-personal information to determine your premium and eligibility. The price also depends on what options you have chosen to purchase. We also use information about how long you have been a customer, how many claims you have made and how much you pay in premiums to determine what terms you are offered at renewal.

#### Fraud prevention

We make checks against lists of people known to have undertaken fraudulent transactions and will reject any matching applicants on the basis they are likely to defraud the company.

You have a right not to be subject to automated decision-making in the circumstances described above and where automated decision-making used in the assessment of your application or fraud prevention, you can contact us to request that any declined decision is reconsidered. If you want to opt out of automatic decision-making, let us know, although in some circumstances it may mean we can't offer you a quote or policy as some automated decisions are necessary to provide your insurance policy.

#### The right to withdraw consent:

In order to provide insurance cover and deal with insurance claims in certain circumstances insurance market participants may need to process your special categories of personal data, such as medical and criminal convictions records, as set out against the relevant purpose.

Your consent to this processing may be necessary for the insurance market participant to achieve this. You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.

#### The right to lodge a complaint

You have a right to complain to the ICO at any time if you object to the way in which we use your personal information. More information can be found on the Information Commissioner's Office website: https://ico.org.uk/

You can make any of the requests set out above using the contact details provided to you in your policy documentation. Please note that in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

In some circumstances exercising some of these rights will mean we are unable to continue providing you with cover under your insurance policy and may therefore result in the cancellation of the policy. You will therefore lose the right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before you exercised your right, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your Policy is cancelled.

## 8. Marketing

You're in control of how we may use your information for marketing. We will only contact you if you've provided your consent. Then, we might use your information to tell you about products and services that could interest you. We will never use your personal information in any advertisement campaigns without explicit consent, for example any testimonial you may provide.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to unsubscribe from emails sent by us, you may contact us using the details set out in your documentation to update your contact preferences. In such circumstances, we will continue to send you service related (non-marketing) communications where necessary.

Please note that we may retain any data provided to us on our websites for a limited period, even if you do not complete your quote. The information may be used to enquire as to why you did not complete your quote or for us to better understand your needs but only if you have agreed for us to contact you.

## 9. Download a copy of the Privacy Policy

To download a full copy of this Privacy Policy in PDF format, please visit our website: http://www.regent-group.co.uk/privacypolicy

## 10. Identities of data controllers and data protection contacts

The insurance lifecycle involves the sharing of your personal data between insurance market participants, some of which you will not have direct contact with. You can find out the identity of the initial data controller of your personal data within the insurance market life-cycle in the following ways:

- Where you took out the insurance policy yourself: the insurer and, if purchased through an
  intermediary, the intermediary will be the initial data controller and their data protection
  contact can advise you on the identities of other insurance market participants that they have
  passed your personal data to.
- Where your employer or another organisation took out the policy for your benefit: you should contact your employer or the organisation that took out the policy who should provide you with details of the insurer or intermediary that they provided your personal data to and you should contact their data protection contact who can advise you on the identities of other insurance market participants that they have passed your personal data to
- Where you are not a policyholder or an insured: you should contact the organisation that collected your personal data who should provide you with details of the relevant participant's data protection contact.

If you wish to contact the Data Protection Officer the details are below:

#### The Data Protection Officer:

Regent Facilities Limited Crown House Augusta Place Royal Leamington Spa Warwickshire CV32 5EL

Email Address: <a href="mailto:dpo@regent-group.co.uk">dpo@regent-group.co.uk</a>

If you would like to contact the UK's Information Commissioner's Officer direct; please write to:

The Information Commissioner's Office,

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

https://ico.org.uk/global/contact-us/email/

## 11. Regent Facilities Limited Company Details

#### Regent Facilities Limited

Regent Facilities Limited, registered in England and Wales with company number 7735900. Registered Office: Crown House, Augusta Place, Learnington Spa CV32 5EL.

#### **Mobile Homes Insurance Service**

Regent Facilities Limited trading as Mobile Homes Insurance Service, registered in England and Wales with company number 7735900. Registered Office: Crown House, Augusta Place, Leamington Spa CV32 5EL.

#### **Horse and Rider Insurance Direct**

Regent Facilities Limited trading as Horse and Rider Insurance Direct, registered in England and Wales with company number 7735900. Registered Office: Crown House, Augusta Place, Leamington Spa CV32 5EL.

#### **Regent Insurance Group**

Regent Facilities Limited trading as Regent Insurance Group, registered in England and Wales with company number 7735900. Registered Office: Crown House, Augusta Place, Leamington Spa CV32 5EL.

#### **Insurance Services**

Regent Facilities Limited trading as Insurance Services, registered in England and Wales with company number 7735900. Registered Office: Crown House, Augusta Place, Leamington Spa CV32 5EL.

## 12. Regent Facilities Limited Privacy declaration

We request and use your personal information to allow us to give the best service we possibly can, whilst maintaining compliance with various regulations across the industry. This allows us to provide you with a more personal service. We understand how important it is to safeguard your data and prevent it falling into the wrong hands. We commit to you that we will only use the information you provide us with for the purposes declared and your data will never be sold to a Third Party.

We provide you with up-to-date prevention and protection solutions, through an in-depth and well-informed understanding of the risks you face. To do this, we collect your personal information and use it in compliance with data protection laws. We have in place procedures and contractual arrangements designed to ensure that all employees, sales representatives, advisers and service providers keep client files confidential.