

### Scope

- 1.1** GDPR replaces the EU Data Protection Directive of 1995 and supersedes the laws of individual Member States that were developed in compliance with the Data Protection Directive 95/46/EC. The purpose of the GDPR is to protect the 'rights and freedoms' of natural persons (data subjects) by ensuring their personal data is only processed with their explicit consent and knowledge.
- 1.2** GDPR applies to both automated and manual processing of personal data. This means regardless of whether your personal data is processed via electronic devices such as computers, or via paper-based methods, the principles of GDPR shall still apply.
- 1.3** GDPR applies to all Data Controllers that are based within the European Union and/or process personal data relating to any data subject's resident within the European Union.

### Data Controller

- 2.1** The Data Controller responsible for the processing of personal data for Connect Insurance Brokers Ltd is the Company Director, Mr. David Mackenzie.
- 2.2** If you have any questions about the processing of your personal data, the Data Controller can be contacted by email at: [data-control@connect-insurance.co.uk](mailto:data-control@connect-insurance.co.uk)

### Processing

- 3.1** For Connect Insurance Brokers Ltd to carry out our duties, we require explicit informed consent to collect, store and process data relating to our customers.
- 3.2** The personally identifiable information that we may collect includes:
  - 3.2.1** Full name.
  - 3.2.2** Date of Birth.
  - 3.2.3** Address(es).
  - 3.2.4** Telephone Number(s).
  - 3.2.5** Email Address(es).

**3.2.6** Driving Licence Number.

**3.2.7** Medical Data.

**3.2.8** Driving Convictions.

**3.2.9** Criminal Convictions.

**3.3** There are many reasons that we may collect and process this data:

**3.3.1** We are unable to provide an **insurance quotation** without collecting, storing, and processing the personal data of our prospective customers; we therefore collect store and process personal data in relation to the calculating of insurance quotations and the arrangement of insurance policies. Personal data collected for the purpose of insurance quotations will be shared with third parties relevant to the generation of insurance quotations; examples of the third parties include:

**3.3.1.1** Regulatory Bodies

**3.3.1.2** Insurance Underwriters/MGA's

**3.3.1.3** Credit Reference Agencies

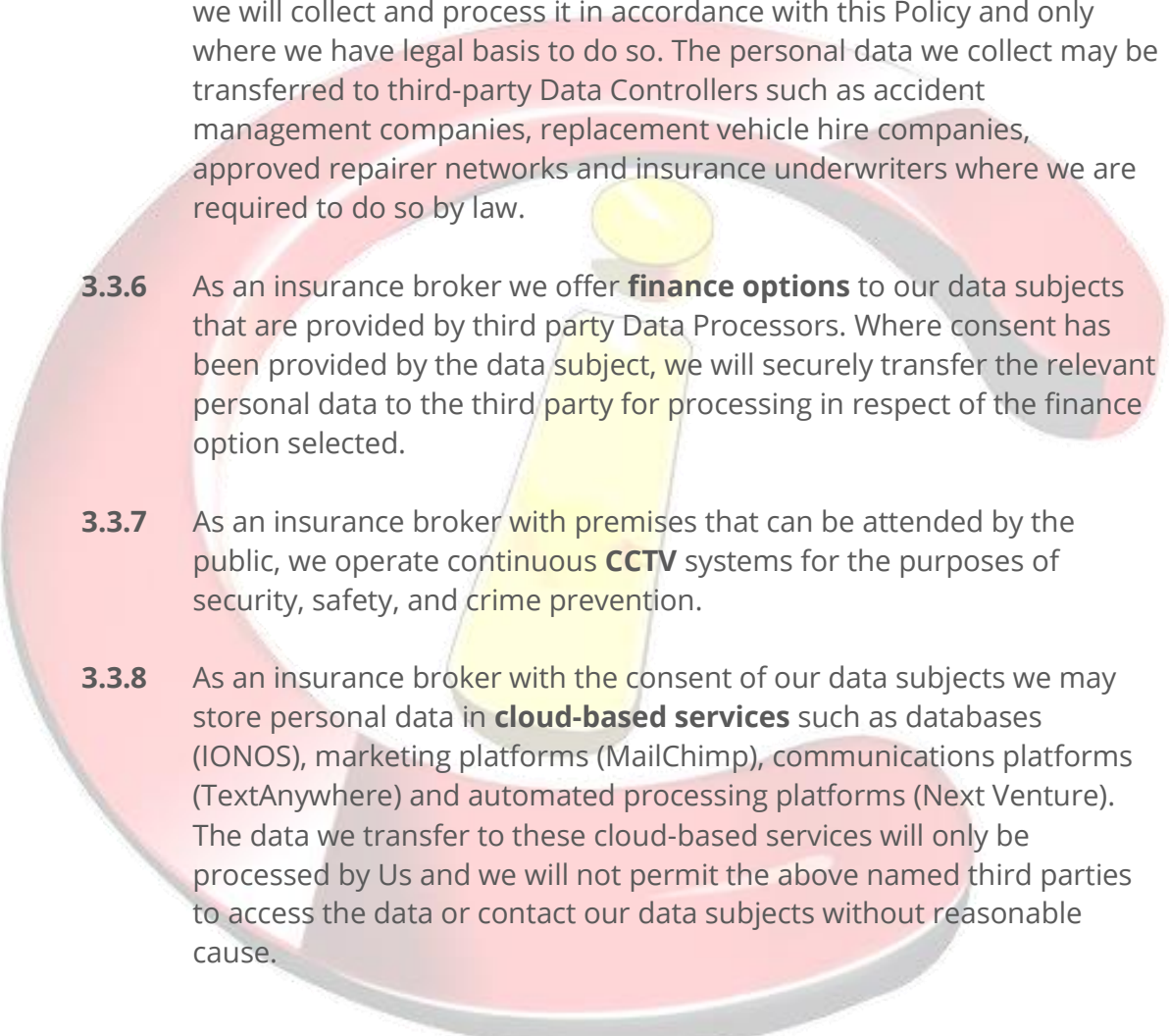
**3.3.1.4** MyLicence

**3.3.2** The third party(s) will never contact our data subjects.

**3.3.3** As an insurance broker we are unable to provide **insurance cover** without collecting, storing, and processing the personal data of our prospective customers. Where a data subject is satisfied with an insurance quotation we offer and provides explicit consent, we shall process their personal data for the purposes of providing a service, a contract of insurance. Where necessary we will transfer the data subject's personal data to third party Data Controllers relevant to the insurance contract including insurance underwriters and finance providers. Where an Insurance Contract has been enacted, the third-party Data Controllers will have consent to communicate directly with the data subject where necessary.

**3.3.4** As an insurance broker who is informed of available products within the insurance market, we have a duty to our customers to keep them aware of other products that may be of value to them. The marketing we undertake is minimal, discreet, and infrequent; we will typically only send marketing materials shortly after an insurance contract has been arranged to promote awareness of additional products provided by us

that may be of interest. We will never send **marketing promotions** on behalf of a third party, nor sell/exchange personal data with a third party for the purposes of marketing. We may utilise third party services to facilitate marketing.

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- 3.3.5** As an insurance broker who is required to be involved in the **handling of claims**, we may need to collect and process personal data in relation to reporting, updating, and communicating with all parties involved. Where the personal data of a third-party data subject is provided to us, we will collect and process it in accordance with this Policy and only where we have legal basis to do so. The personal data we collect may be transferred to third-party Data Controllers such as accident management companies, replacement vehicle hire companies, approved repairer networks and insurance underwriters where we are required to do so by law.
- 3.3.6** As an insurance broker we offer **finance options** to our data subjects that are provided by third party Data Processors. Where consent has been provided by the data subject, we will securely transfer the relevant personal data to the third party for processing in respect of the finance option selected.
- 3.3.7** As an insurance broker with premises that can be attended by the public, we operate continuous **CCTV** systems for the purposes of security, safety, and crime prevention.
- 3.3.8** As an insurance broker with the consent of our data subjects we may store personal data in **cloud-based services** such as databases (IONOS), marketing platforms (MailChimp), communications platforms (TextAnywhere) and automated processing platforms (Next Venture). The data we transfer to these cloud-based services will only be processed by Us and we will not permit the above named third parties to access the data or contact our data subjects without reasonable cause.

## Retention

- 4.1** Our data retention policy ensures that we only retain personal data for the time necessary to conduct our business.
- 4.2** Each category of personal data has a varying retention period attributed to it dependant on the purpose of collection. A summary of this can be seen overleaf;



<b>4.2.1</b>	Insurance Quotations:	24 months
<b>4.2.2</b>	Insurance Policies:	Indefinitely
<b>4.2.3</b>	Marketing:	24 months
<b>4.2.4</b>	Claims:	Indefinitely
<b>4.2.5</b>	Finance Arrangement:	Indefinitely
<b>4.2.6</b>	Unsuccessful Job Applications:	12 months
<b>4.2.7</b>	CCTV Footage:	45 days
<b>4.2.8</b>	Call Recordings:	Indefinitely
<b>4.2.9</b>	Employee Details:	Indefinitely

### Your Rights

**5.1** To better protect the 'rights and freedoms' of natural persons, GDPR provides a more structured and simplified series of eight fundamental Rights that apply to all data subjects.

- 5.1.1** Right of Access
- 5.1.2** Right to Rectification
- 5.1.3** Right to Erasure
- 5.1.4** Right to Restriction of Processing
- 5.1.5** Right to be Informed
- 5.1.6** Right to Data Portability
- 5.1.7** Right to Object
- 5.1.8** Right to Not Be Subject to a Decision Based Solely on Automated Processing

**5.2** In addition to the eight fundamental Rights specified above, the data subject also has additional assumed rights including:

- 5.2.1 Right to receive communications (even if they have opted out) in the event of a personal data breach
  - 5.2.2 Right to withdraw consent at any time (where relevant)
  - 5.2.3 Right to complain to a supervisory authority
  - 5.2.4 Right to receive compensation.
- 5.3 Consent preferences can be updated at any time at:
- <https://www.connect-insurance.uk/more/consent-management>

## Security

- 6.1 We take data security very seriously and boast a very robust and resilient environment that is structured from the ground up with security at its heart.
- 6.2 Our premises have appropriate physical, electronic and managerial procedures to prevent unauthorised access including continuous CCTV, alarm systems and secure access doors that cannot be bypassed without authorisation.
- 6.3 Our electronic environment includes a state-of-the-art firewall and unified threat management platform, anti-virus solutions, reporting schedules and auditing that ensure continuous transparency and visibility over data access and processing.
- 6.4 Personal Data is only transferred outside of our environment in an encrypted format or via a secure communication channel; this can be either in the form of encrypted data streams, Virtual Private Networks, secure email channels, or as encrypted data stored on magnetic tape.
- 6.5 Where personal data is stored on a third-party server, we take adequate precautions to ensure that the respective environment is safe and secure, and that the risk of a personal data breach is as minimised as possible without impeding our ability to conduct business.

## Marketing Partners

- 7.1 As part of our data processing for Supplementary Marketing we may securely transfer personal data to additional Data Processors so that we can make use of the functionality they offer.



- 7.2** Our data subjects will never be contacted by the third party unless consent has been secured in advance.
- 7.3** The third-party data processors we may transfer personal data to are listed below:
- 7.3.1** We use **TextAnywhere** to enable us to contact data subjects via SMS (text) message for marketing purposes, and in relation to Insurance Quotations and Insurance Policies.
  - 7.3.2** We use **MailChimp** to enable us to contact data subjects via email for marketing and update purposes. The only data stored by MailChimp are email addresses.
  - 7.3.3** We use **Next Venture** for the automated processing of personal data to improve efficiency of generating Insurance Quotations for our data subjects.
  - 7.3.4** We use cloud-based databases hosted by **IONOS** to store and organise personal data that is collected for the purpose of Insurance Quotations via our Websites.

## Complaints

- 8.1** Under Article 51 of GDPR, all data subjects have the right to complain to a supervisory authority. If you are dissatisfied with how We collect, store, or process your personal data, you are within your rights to raise a formal complaint.
- 8.2** You can raise a formal complaint with Connect Insurance directly using the following methods:
- 8.2.1** Post     Connect House, Foundry Street, S-o-T, Staffordshire, ST1 5HE
  - 8.2.2** Email     [complaints@connect-insurance.co.uk](mailto:complaints@connect-insurance.co.uk)
  - 8.2.3** Phone     01782 280 280
- 8.3** If you are dissatisfied with the outcome of the formal complaint, you can escalate this to the supervisory authority. The supervisory authority for the United Kingdom is The Information Commissioner's Office [ICO].
- 8.3.1** Post     Water Lane, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

**8.3.2** Email [international.team@ico.org.uk](mailto:international.team@ico.org.uk)

**8.3.3** Phone 01625 545 745

