Privacy Notice

S Rankin & Company are committed to ensuring your privacy is protected.

Data Controller and Data Processor

Principally we will ensure data is processed lawfully, fairly and in an open and transparent manner and ensure appropriate security measures are in place against unauthorised or unlawful processing or accidental loss, destruction or damage using appropriate technical or organisational measures (such as restricting access to key people within our organisation for certain aspects of your information; and periodically checking the level of security we apply to prevent unauthorised use, accidental loss, or misuse of your information).

We are governed by and shall operate strictly in accordance with contracts we have in place with our suppliers (e.g., Insurance Companies, our Software Provider, and similar providers of services to us) which set out our relationship as a processor as required by the GDPR. As a controller we in certain circumstances also determine the purposes and means of processing data

Collection

We may collect the following information:

- Information required to produce an insurance quote
- Name, address, date of birth, job title, licence details, contact numbers, including email address, gender, payment details, vehicle and property details
- it may be necessary to collect sensitive data, such as medical history
- or criminal convictions
- We also collect information about you from other persons and this also forms part of your personal data. This includes information from: Policyholders, named persons or other parties acting on your behalf: where you are the holder of a policy or named on a policy, we may collect information about you from another person. We will ask them to confirm that they have your consent to provide this information about you. When you provide information on others, you must ensure you have their permission to do so

Use of the information

We mainly use your information so that we can provide a quote, set up, administer and manage your policy, but also

- to administer claims,
- for the detection and prevention of fraud, money laundering and other offences
- for storage and back up of data
- for credit and financial assessments
- making payments
- recovering monies
- to verify your identity
- staff training & management

Our legal Basis for processing

The legal bases we rely on for using your personal data

- the processing is necessary for the performance of an insurance contract
- claims handling
- the processing is necessary for compliance

Sharing of Information

In providing our services to you we may share your personal data with:

- our service providers
- our financiers
- Insurers, associated companies, agents and reinsurers
- credit or financial assessment
- credit check from a credit reference agency. Searches will appear on your credit report whether or not your application proceeds.
- · Your information may be shared with the police, law enforcement agencies, recognised governing and regulatory bodies
- Other insurance businesses when we are verifying insurance history and entitlement to no claims bonus

What we will not do with your information

Unless required to do so by law, or for other similar reasons, other than those outlined (see sharing your information) we will never otherwise share personal information without good reason and without ensuring the appropriate care and necessary safeguards are in place; we will in any other event ask for your consent to share that information and explain the reasons.

Profiling

We will use your personal data to engage in profiling with the use of our computer system. Our computer will make certain decisions about you which will be based on comparing you with other people. This is important because:

- In providing insurance services it assists us to evaluate your risks in order to provide you with an appropriate insurance product and pricing
- In detecting criminal activity, it assists us to detect, for example fraud and other criminal activities

Your rights

You have the right to:

- · Withdraw your consent where we are processing your information on the legal basis of consent
- · Access to the personal data concerning you that we hold and to be informed why and how we process that data
- Require us to correct any inaccurate information about you (including missing details). In certain cases, you are required by the terms of your insurance policy to make such corrections
- Erasure/right to be forgotten, which means you have a right to have personal data concerning you erased.
 However, you may only request the deletion of your data in specific situations
- Not to be subjected to the decision-making bases solely on automated processing
- Data portability, which means you may request from us all personal data that you have provided to us
- Object to the processing of your personal data
- Restrict processing of your personal data, where you feel it is inaccurate, that we are processing it unlawfully or that we no longer need it or where you have invoked your right to object.

We will retain your information for 7 years after cancellation of a policy, to satisfy FCA requirements.

Your information may be transferred to countries outside the EU, when this happens measures will be taken to ensure your information is adequately protected.

We may provide your information to anyone we transfer our rights and duties to e.g. in the event of the sale of our business If you would like to contact us in relation to any aspect of our use of your personal data, please contact our Data Protection Officer, by telephone on 02892676235 or write to DPO, S Rankin & Co, 21-23 Bachelors Walk, Lisburn, BT28 1XJ

You have the right to complain how we treat your personal data and sensitive personal data to the Information Commissioner's Office (ICO). The ICO can be contacted on https://ico.org.uk/global/contact-us/

Marketing

It is extremely important that all parties insured under your policy understand how we process information, including that set out in the Marketing Section of our Privacy Policy and this Terms of Business Agreement.

In distributing any marketing, we will act honestly, fairly, and professionally and in the best interests of a customer or potential customer, including asking you separately for your permission (consent) to contact you, and the means to contact you (such as by phone, or e-mail, push notifications, SMS text, or post) to tell you about:

- new products or services we have or are developing;
- trialling products and services which we think may improve our service to you or our business processes;
- offer you rewards;
- enter you into a competition.

We will typically ask for your permission when you first contact us, but you have the right to easily withdraw your consent whenever you wish (unsubscribe). We will regularly review your consent to check that your relationship with us and the processing and the purposes have not changed.

We have processes in place to refresh your consent at appropriate intervals, and act on withdrawals of consent (unsubscribe) as soon as we can and not penalise you if you choose not to give or later choose to withdraw your consent.

Using our Website and Cookies

You will be asked to accept a cookie, which is a small file of letters and numbers that is downloaded on to your computer when you visit our website. This will be clearly explained to you when you visit our website, and you will typically have to accept the cookie to benefit from the services our website can offer. Cookies are operated in strict accordance with Privacy and Electronic Communications Regulations 2011 (PECR) and are widely used by many websites and enable our website to remember your preferences, recording information you have entered. These same rules also apply if you access or use any other type of technology to gain access to information stored electronically by us.

 $We may update this Privacy \ Notice from time to time. \ We will notify you of the changes \ where \ we are required by law to \ do \ so.$