McCarroll McConnell & Co Ltd – Privacy Notice

INTRODUCTION

The Data Protection Act 2018 ("DPA 2018") and the General Data Protection Regulation ("GDPR") impose certain legal obligations in connection with the processing of personal data.

McCarroll McConnell & Co Ltd are deemed to be data controllers within the meaning of the GDPR and we process personal data. The firm's contact details are as follows: 17 Pennybridge industrial Estate, Ballymena, BT42 3HB

We may amend this privacy notice from time to time. If we do so, we will supply you with or otherwise make available to you a copy of the amended privacy notice.

OUR LEGAL BASIS

Our intended processing of personal data has the following legal basis:

- at the time you instructed us to act, you gave consent to our processing your personal data for the services required
- the processing is necessary for the performance of our contract with you
- the processing is necessary for our legitimate interests and legal obligations.

It is a requirement of our contract with you that you provide us with the personal data that we request. If you do not provide the information that we request, we may not be able to provide our services to you. If this is the case, we will not be able to commence acting or will need to cease to act.

THE INFORMATION WE COLLECT

- Information that you provide to us for the purpose of registering with us including your email address, name, address, business name and address and details of other policies that you hold.
- Under certain circumstances we may also need to obtain information about Race or Origin, Gender, Religion, Health, Sex or Sexual Orientation.
- We might also need details of criminal convictions.
- We will only collect what is necessary and protect it with appropriate security measures.
- Information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters.
- Information that you provide to us relating to the risk or services which you have asked us to provide a quotation for
- Any other information that you choose to send to us.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to these.
- Details of your visits to our website including, but not limited to, traffic data, location data, webchats, browser usage and other communication data.

WHY DO WE NEED THIS INFORMATION

The information which we ask for is necessary for the following reasons:

1. Offering and providing insurance and related products and services to you
2. Establishing and maintaining communications with you
3. Verifying your identity and the accuracy of your Personal Information with government agencies, industry associations, insurance companies, underwriting agents, insurance brokers or other insurance intermediaries
4. To analyse and assess risks on a prudent basis prior to submission to those parties identified under
5. 3. above
6. Facilitating your payment of premiums, commissions and fees
7. Investigating claims
8. Detecting and preventing fraud or other illegal activities
9. Compiling statistics
10. Complying with the law or the requests of law enforcement agencies or regulators; and
11. Notifying you or allowing our affiliated companies to notify you of certain products or services offered by our affiliated companies.

SENSITIVE DATA

In carrying out our duties as Data Controller and Data Processor we will collect sensitive information, about you, and other parties related to this insurance because it is:

- necessary for the performance of or to take steps for you to enter into a contract of insurance, or
- necessary for compliance with a legal obligation
- necessary to protect your vital interests
- necessary for our own legitimate interests or those of other controllers or third parties; and
- necessary for a task carried out in the public interest or for an exercise of an official authority (e.g., a regulatory body)

What we mean by sensitive data includes information such as:

- about your health including medical conditions
- motoring or other criminal convictions

We will always apply additional organisational and technical measures for this category of data, including restrictions to access this data.

YOUR DATA SECURITY

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the provision of information you have requested. By submitting your personal data, you agree to this transfer, storing or processing. Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this privacy notice.

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure servers. All electronic transactions you make to or receive from us will be encrypted using SSL technology.

In addition to this, we adhere to strict Data Protection policies within our office locations which includes the physical security of your data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

WHO WE MAY SHARE YOUR DATA WITH

On your behalf and during the course of providing quotations and services to you, we may approach the following:

- Insurance Companies
- Reinsurers
- Underwriting Agents
- Other Insurance Intermediaries
- Other Insurance Brokers or Agents
- Surety/Bonding companies
- Credit Providers
- HMRC Sanctions
- Credit Referencing Agencies
- Claims Management Companies
- Debt Recovery Agencies
- Claim Management Companies
- Uninsured Loss Recovery Agents
- Auditors
- External Consultants
- Banks
- Financial Transaction Processors
- Crime and Fraud Prevention Agencies
- Regulators
- Data Processors*

* We rely on third-party service providers to perform a variety of business operations on our behalf. In so doing, we may need to share your personal information with them. We provide our service providers with only the personal information they need to perform the services we request and we require that they respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your data for their own purposes and only permit them to process your personal data for specific purposes and in accordance with our instructions

DATA RETENTION

When acting as a data controller and in accordance with recognised good practice within the insurance sector we will retain all of our records relating to you as follows:

- where we have placed insurance for you, we will retain the records for a minimum of 7 years after the policy or our services to you end
- where you have issued a complaint to us, we will retain the records for 7 years after the finalisation of your compliant
- Where you have provided services or products to us and the service agreement is no longer in force, we will retain all relevant records for 7 years from the date the business relationship ceased
- Where you have contacted us for a quotation but did not proceed with this, we will retain your records for 3 years.

YOUR RIGHTS UNDER THE GDPR:

RIGHT TO VIEW THE INFORMATION WHICH WE HOLD

You may make a subject access request (SAR) at any time to find out more about the personal data which we hold about you. We will usually respond to SARs within one month of receipt (this can be extended by up to two months in the case of complex and/or numerous requests, and in such cases the data subject shall be informed of the need for the extension).

Subject access requests received must be forwarded to our Compliance Manager at the address given above or by emailing info@mccmcc.co.uk

We do not charge a fee for the handling of normal SARs. We do however reserve the right to charge reasonable fees for additional copies of information that has already been supplied to you, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

RIGHT TO RECTIFY INACCURATE OR INCORRECT INFORMATION

If the information which we hold is inaccurate or incomplete, you may contact us using the details above stating which part(s) are incorrect and the relevant amendments. We will contact you to notify when the data has been rectified which we aim to complete within one month.

RIGHT TO HAVE YOUR DATA ERASED

You may contact us using the details above if you wish for your details to be deleted from our records. Please note that these requests are subject to our need to hold data for legal reasons. Where we believe we are unable to delete your details for these reasons, we will provide our decision and the rationale behind this within one month.

RIGHT TO WITHDRAW YOUR CONSENT

Where you have consented to our processing of your personal data, you have the right to withdraw that consent at any time. Please inform us immediately if you wish to withdraw your consent.

Please note:

- the withdrawal of consent does not affect the lawfulness of earlier processing
- if you withdraw your consent, we may not be able to continue to provide services to you
- even if you withdraw your consent, it may remain lawful for us to process your data on another legal basis (e.g. because we have a legal obligation to continue to process your data).

RIGHT TO SUPRESS PROCESSING OF DATA

You have the right to suppress processing of your personal data, when processing is restricted, we are permitted to store the personal data, but not further process.

RIGHT TO OBJECT TO AUTOMATED PROCESSING

You have right in certain circumstances to not be subject to a decision when it is based on automated processing; and/or it produces a legal effect or a similarly significant effect on you.

RIGHT TO DATA PORTABILITY

You have a right to data portability, so we will normally, not only provide the information free of charge (however we may apply a charge where information requests are excessive) but we will provide that information in a format that is easily accessible, typically in a CSV format, should you require it to allow your information to be exchanged easily with other organisations.

MARKETING

Separately, we will always ask for your permission (consent) to contact you, including 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 will maintain 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 will 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.

COMPLAINTS

If you have requested details of the information we hold about you and you are not happy with our response, or you think we have not complied with the GDPR or DPA 2018 in some other way, you can complain to us. Please send any complaints to the 'Compliance Manager' at the address above.

In addition, if you require further information regarding the GDPR legislation, you can contact the Information Commissioners Office (ICO) as follows:

- www.ico.org.uk
- Telephone – 0303 123 1113

McCarroll McConnell & Co Limited is authorised and regulated by the Financial Conduct Authority under the Registration Number 306066. McCarroll McConnell & Co Limited is part of Adler Fairways Insurance Group and is registered in England and Wales under registration number NI049105.
Our registered address is 17 Pennybridge Industrial Estate, Ballymena, County Antrim, BT42 3HB.