

PRIVACY POLICY

Introduction

We recognise our responsibility to treat your personal information with care and to comply with all relevant legislation, in particular the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR). This notice covers our requirement to provide you with information on how and why we use your personal data and of your rights under the legislation.

Data Controller

We have provided you with a quotation and/or administer your insurance policy and are classed as the "data controller" which means we process your data. The contact details are shown at the foot of this notice. Your data may be passed to other parties, including Insurers, for the purposes of quoting for or arranging your insurance. These parties could also be data controllers and where necessary will issue their own Data Protection Privacy Notices.

What personal information do we collect?

We collect personal data about you (whether over the phone or if you have submitted it via our website), which includes your name, address and contact information. For quotation purposes, we will also need to collect additional sensitive personal information about you such as date of birth and medical history.

If there are other people to be covered under the policy, we will need to collect similar personal information about them. Before you tell us personal details about any other person, you must have their consent to do so and they must understand how we intend to use it.

What happens to your personal data?

We use your personal data to obtain insurance quotes that you have asked us to provide. If you accept a quotation, then we will use your data to arrange a policy and administer it on your behalf. If you need to make a change or a claim, we may need some further information from you in order to help. However, we will never collect any personal data from you that we do not need.

Your data is treated as confidential and will be processed exclusively by Cransford, who are solely based in the UK. However, during the process of obtaining quotes or arranging policies, your personal data will be shared with third parties, for example; insurance companies. (Please refer to the Data Controller section above.) This could mean your data travels outside the EEA (European Economic Area) if any insurance company stores information on servers outside the EEA. We will take every reasonable step possible to protect your data in these circumstances.

Please be assured that we will only share relevant personal data with third parties who are necessary to the fulfilment of any request you make.

In asking us to provide quotations and/or administer your policy you will automatically agree to us sharing all relevant information with the appropriate third parties.

We will use your name and contact information to tell you about any changes that may affect your insurance. We would also like to send you information about other products and services that we offer that will compliment your existing insurance policy. You have the option to unsubscribe from this service at any time.

We may use your data for research or statistical analysis, but nothing contained within any report could identify you or any other person you have provided personal data for.

We will not give anyone else your personal information except on your instructions or authority, or where we are required to by law, or due to regulatory requirements.

Cookies

This section relates specifically to when you visit our website.

A cookie is a small information file that is sent to your computer and is stored on your hard drive. Cookies are what are often used so that sites can remember who you are to save you time when you re-visit a site. Our site statistics software currently also uses cookies to allow us to measure the level of activity occurring on the site. You can change the settings on your browser to prevent cookies being stored on your computer without your explicit consent, or download a web browser which prevents cookies from being stored at all

<http://www.google.com/policies/privacy/ads/>

Retention of Your data

If we arrange a policy on your behalf, the terms of business we hold with insurers require us to retain your information for a minimum of seven years after the policy lapses. After this point we will delete it unless there is a regulatory, business or legal reason for us not to.

If you ask us for a quote but do not take this up, we will not keep your personal information longer than is necessary for the purpose for which it was provided unless we are required by law or have other legitimate reasons to keep it for longer (for example if necessary for any legal proceedings).

If you have given us permission to use your information for other purposes, we will keep your data until you notify us that you no longer wish us to use it for that purpose.

Other uses for Your data

We would like to contact you at a point in the future if you have asked us for a quote but have not taken it up or have lapsed a policy. If you provide us with consent, you will have the option to withdraw this at any point in the future by unsubscribing from emails or phoning or emailing us.

We will remind you of your choices when your policy comes up for renewal.

Updates to our Privacy Policy

From time to time we may need to update our privacy policy to comply with changes in the law or regulation or to ensure best practice. The most up to date policy will always be available on our website.

Your Rights

If at any point you have concerns over the information we hold or how we process it, you can get in touch to ask us to update it or correct it. You can also ask to see the information we hold or ask for it to be deleted. However, please be aware that asking us to delete your information will mean we can no longer administer or offer advice relating to your policy.

Contacting us

If you have a concern about how we use your personal information please contact our Data Protection Officer, by calling 028 9073 5207 or writing to: Data Protection Officer, Cransford, Unit 1 Potters Quay, 5 Ravenhill Road, Belfast BT6 8DN

If you remain dissatisfied, you can complain to the Information Commissioners Office (ICO) by calling their helpline on 0303 123 1114 or at www.ico.org.uk

FAIR PROCESSING NOTICE

The privacy and security of your information is important to us. This notice explains who we are, the types of information we hold, how we use it, who we share it with and how long we keep it. It also informs you of certain rights you have regarding your personal information under current data protection law. The terms used in this Fair Processing Notice are based on the Information Commissioner's Office. You can find out more about the ICO here: www.ico.org.uk/.

Who are we?

Insure Ltd t/as Cransford the Data Controller of the information you provide us and is registered with the Information Commissioner's Office for the products and services we provide to you.

You can contact us for general data protection queries by email to enquiries@cransford.com in writing to The Data Protection Officer, Cransford, Unit 1 Potters Quay, 5 Ravenhill Road, Belfast BT6 8DN. Please advise us of as much detail as possible to comply with your request.

What information do we collect?

To enable us to provide you with the right product or service to meet your needs we will collect personal information which may include your name, telephone number, email address, postal address, occupation, date of birth, additional details of risks related to your enquiry or product and payment details (including bank account number and sort code).

We may need to request and collect sensitive personal information such as medical history for us to provide you with the product or service.

We only collect and process sensitive personal data where it is critical for the delivery of a product or service and without which the product or service cannot be provided. We will therefore not seek your explicit consent to process this information as it is required by us to provide the product or service you have requested and is legitimised by its criticality to the service provision. If you object to use of this information, then we will be unable to offer you that product or service.

How do we use your personal information?

We will use your personal information to

- Assess and provide the products or services that you have requested
- Communicate with you
- Undertake statistical analysis

We may also take the opportunity to

- Contact you about products that are closely related to those you already hold with us
- Provide additional assistance or tips about these products or services
- Notify you of important functionality changes to our websites

Only where you have provided us with consent to do so, we may also from time to time use your information to provide you with details of marketing or promotional opportunities and offers relating to other products and services from the Kingsbridge Healthcare Group.

From time to time we will need to call you for a variety of reasons relating to your products or service (for example, to discuss renewal of your insurance contract). We are fully committed to Ofcom regulations and have strict processes to ensure we comply with them.

To ensure the confidentiality and security of the information we hold, we may need to request personal information and ask security questions to satisfy ourselves that you are who you say you are.

We may aggregate information and statistics on website usage, and we may also provide this information to third parties. These statistics will not include information that can be used to identify any individual.

Securing your personal information

We follow strict security procedures in the storage and disclosure of your personal information in line with industry practices, including storage in electronic and paper formats.

We store all the information that you provide to us, including information provided via forms you may complete on our websites; information which we may collect from your browsing (such as clicks

and page views on our websites); information you provide for us to produce quotes; as well as applications and switch declarations you complete when purchasing a product or service.

Any new information you provide to us may be used to update an existing record we hold for you.

When do we share your information?

We provide statistical information to the Financial Conduct Authority (FCA), but no information that can identify individuals.

In addition to Cransford, third parties (for example insurers) deliver some of our products or provide all or part of the service requested by you. In these instances, while the information you provide will be disclosed to these companies, it will only be used for the provision and administration of the service provided (for example, the verification of any quote given to you; or claims processing, underwriting and pricing purposes or to maintain management information for analysis). As well as insurance providers this may also include companies which process information before passing it on to insurance companies for quotation and pricing purposes.

We will only share your information for any direct marketing of additional services and products where we have your consent to do so.

The data we collect about you may be transferred to, and stored at, a destination outside of the European Economic Area ("EEA"). It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. Such staff may be engaged in, amongst other things, the provision of information you have requested.

If we provide information to a third party, we will require it and any of its agents and/or suppliers to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Fair Processing Notice, and with the Data Protection Act 2018.

We may of course be obliged by law to pass on your information to the police or other law enforcement body, or statutory or regulatory authority including but not limited to the Employer's Liability Tracing Office (ELTO).

We may also share your information with anyone you have authorised to deal with us on your behalf.

How long do we keep your information for?

We will not keep your personal information longer than is necessary for the purpose for which it was provided unless we are required by law or have other legitimate reasons to keep it for longer (for example if necessary for any legal proceedings).

We will normally keep information for no more than 6 years after termination or cancellation of a product, contract, or service we provide. In certain cases, we will keep your information for longer, particularly where a product includes liability insurances or types of insurance for which a claim could potentially be made by you or a third party at a future date, even after your contract with us has ended.

Your rights

Under data protection law you have the right to change or withdraw your consent and to request details of any personal data that we hold about you.

Where we have no legitimate reason to continue to hold your information, you have the right to be forgotten.

We may use automated decision making in processing your personal information for some services and products. You can request a manual review of the accuracy of an automated decision if you are unhappy with it.

If you wish to inform us of changes in consent for marketing, please contact us at the address or telephone number indicated in any recent correspondence or emails you have received from us.

Terms of Business

Status

The Financial Conduct Authority (FCA) is the independent watchdog, that regulates the selling of general insurance products. Cransford is the trading name of Insure I Ltd which is authorised and regulated by the Financial Conduct Authority. Insure I Ltd also own H3 Insurance. Our Reference Number is 505255. You can check our authorisation on the FCA Register by visiting the FCA website www.fca.org.uk or by contacting them on 0800 111 6768.

Our Service to You

Cransford is an insurance intermediary providing advice about products and services, arranging cover on your behalf and helping with any ongoing changes. The information we provide should enable you to make an informed choice about which product best suits your needs and requirements. We do not provide financial advice.

Treating Customers Fairly

It is our policy to treat customers fairly in all areas of our business. We do this by the following means:

- Our product meets the needs and expectations of our clients.
- We provide clear information at all times.
- We provide an high level of service.
- Our staff understand that the needs of our clients are central to the decisions we make.
- We are transparent in all our dealings with our clients and will not impose unreasonable barriers that stop them using the policy for the intended purpose.

Client Money

Insure I Ltd is authorised to hold monies on behalf of clients and are governed by strict rules pertaining to client money set down by the FCA. Interest may be earned on monies held which will be retained by Insure I Ltd. Client money is held separately from Insure I Ltd.'s own money with an approved bank, segregated in a client bank account designated as subject to a Statutory Trust.

Cransford DOES NOT RETAIN CLIENT MONIES. All payments due in respect of policies issued will be made directly to the provider of the policy.

Data Protection

We collect and maintain personal information in accordance with the Data Protection Act 2018. We will only share your data with other parties necessary for the underwriting and administration of the policies we place on your behalf.

All personal information is treated with the utmost confidentiality and with appropriate levels of security. We will not keep your information longer than is necessary. Your information will be protected from accidental or unauthorised disclosure.

Privacy

We act as a data controller for the information you supply. We only collect and hold data that is relevant for the service you have asked us to provide. We only share your information with other parties necessary in the performance of the service you have asked us to provide. In asking us to provide a service, you automatically agree to us sharing all relevant information with the appropriate third parties. Our Privacy Policy is available on request or available on our website www.cransford.com.

Disclosure of Information

When incepting, renewing or amending your insurance policy you must take reasonable care to answer questions honestly and not provide information that you know to be incorrect. If you fail to do this your claim could be rejected, your policy could be cancelled or treated as if it never existed.

Fees

Cransford receives commission from insurers for the policies we place on your behalf. In certain circumstances we may elect to forgo

commission and instead charge a fee. In such circumstances we will discuss this with you.

Cancellation

You have the right to cancel your policy without penalty within the first 14-30 days (depending on Insurer). This is known as the 'cooling off period' and runs from the date your policy starts or on which you receive your policy booklet and certificate, whichever is later. The right only exists for policies where the duration of cover is greater than 30 days and where there have not been any claims. If you cancel within this period, you will only be charged for services received up to the date of cancellation including any administration costs involved in setting up and/or the cancelling of the policy. If you wish to do so, please notify us immediately by writing to us.

Statement of Demands and Needs

The policies we sell are designed to meet the needs of individuals / businesses who want quicker access to medical treatment and have additional choice and benefit over what would normally be available under the NHS. We advise you to read all policy documents including the policy summary and certificates and contact us if you have any queries or concerns.

Claims

Claims should be reported directly to the policy provider. Information on how to claim will be given in the policy wording. Detailed information of individual claims will never be voluntarily shared by the provider with Cransford. However, in managing the performance of your policy Cransford may require certain claims information to assess suitability for other products and services. Cransford will contact the provider to obtain this information.

Complaints

We always endeavour to provide the highest standard of service, however, if you have cause to complain please write to:

Dispute Resolution Manager

Cransford
Unit 1 Potters Quay
5 Ravenhill Road
Belfast
BT6 8DN

Telephone: 028 9073 5207

We will make every effort to resolve your complaint quickly and efficiently and keep you informed throughout the process. Full details of our complaints policy is available on request.

If you are not satisfied with our final response you may decide to refer your complaint, without prejudice, to The Financial Ombudsman Service at:

South Quay Plaza
183 Marsh Wall London E14 9SR

Telephone: 0300 1239 123

Website: www.financial-ombudsman.org.uk

Financial Services Compensation Scheme (FSCS) - We are covered by the FSCS. You may be entitled to compensation if we cannot meet our obligations. Further information is available from the Financial Services Compensation Scheme. Telephone 020 7892 7300 or visit the website at www.fscs.org.uk