



# Fair Processing Notice

## Definitions

To be clear on what we mean in this notice:

- “personal data” means any information that can be used to identify a living individual;
- “sensitive personal data” means personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, health data, sex life, sexual orientation or criminal convictions/offences;
- “controller” means an organisation that decides why and how to collect personal data from or about an individual;
- “processor” means an organisation that is engaged by a controller to process personal data on its behalf;
- “Howden UK&I” means Howden UK&I Holdings Limited and any company or organisation in which Howden UK&I Holdings Limited holds significant share capital;
- “third-party” means someone who isn’t you, us, or another company in Howden UK&I.

# 1. Our details

We are a company that is registered in England and Wales under company number 03507147, with a registered address of One Creechurch Place, London, EC3A 5AF. We are registered with the Information Commissioner's Office ('ICO') under registration Z6430011, and act as a controller of personal data. We have appointed a Data Protection Officer ('DPO'), and individuals have the right to contact our DPO with data protection queries or concerns that they may have. You can contact our DPO in the following ways:

**By e-mail:** [dpo@howden-insurance.co.uk](mailto:dpo@howden-insurance.co.uk)

**By post:** FAO The Data Protection Officer, Howden UK & Ireland, Ageas House, The Square, Gloucester Business Park, Brockworth, Gloucester, GL3 4ZP, UK.

Alternatively you can email us at [enquiries@redarc.co.uk](mailto:enquiries@redarc.co.uk) or call us on 01244 625180.

# 2. Who does this notice relate to

This notice relates to the following types of individuals, where we hold your personal data:

- Employees of clients to whom we provide a service;
- Members of a trade or professional organisation;
- Visitors to our website;
- Individuals who contact us with a query, concern or complaint;
- Individuals who request information from us.

# 3. What personal data do we collect

Depending on your relationship with us, we may collect the following types of information from, or about, you:

- **Identity and contact data:** for example, your name, gender, date of birth, telephone number and e-mail address
- **Location data:** for example, your residential address;
- **Correspondence data:** for example, copies of letters and e-mails we send you or you send to us;
- **Sensitive personal data:** for example details of a health-related condition that you discuss with us; and
- **Internet data:** for example, information collected by cookies and other online technologies when you use our website, such as your IP address.

## 4. How do we collect personal data

We may collect personal data from, or about, you through different channels depending on our relationship with you. For example, we may receive your personal data from insurers, employers or membership organisations where they have made our services available to you, and where they have established a lawful basis for providing us with that information. Alternatively we will collect personal data directly from you when you engage us, or we engage you, in writing or over the phone.

## 5. Why do we collect personal data

Under data protection law we are required to establish a lawful basis to justify our use of your personal data. Below are our reasons for processing personal data:

- **To enter into or perform a contract with you;** for example, to arrange and administer a service we have agreed to provide you, to answer any queries you may have in relation to this, and to action your requests;
- **To comply with a legal obligation;** for example, to fulfil your rights under data protection law, to handle complaints, and to comply with other legal record-keeping requirements;
- **To achieve our legitimate business interests;** for example, to monitor and improve our products and services, to undertake internal management reporting, or to demonstrate compliance with applicable laws and regulations;
- **To undertake an activity you have consented to;** for example, if you have consented to us sharing your personal data as part of a specialist referral;
- **To protect your vital interests;** in extreme or unusual circumstances we may need to use your personal data to protect your life or the lives of others.

In addition to the above, the processing of special category data (such as health-related data) requires organisations to satisfy further conditions in order to justify this processing. We therefore only process special category data if:

- You have explicitly consented to this. Please note that if you consent to us sharing details of a health condition with a specialist to provide you with further support, the documentation that you need to complete will include a provision for you to explicitly express this consent;
- This is necessary for the provision of healthcare or treatment; or
- Our processing is necessary to administer a claim or right arising out of an insurance contract.

## 6. Who do we share personal data with

Below are the categories of third parties we may share your personal data, but only where we have a legitimate reason for doing so:

- Sub-contractors and third parties who we engage to provide you with private consultations, counselling, therapy, or to purchase specialist equipment that is required to help us provide our services to you;
- Other companies within Howden UK&I, for example in order to receive Compliance, Legal or IT support;
- Service providers who help us manage our IT and back office systems; and
- Any third party where disclosure is required to comply with legal or regulatory requirements.

## 7. International data transfers

In rare scenarios we may need to transfer your personal data to an overseas party. For example if we are required by law or regulation, or if we utilise a cloud-based data centre.

If the data protection laws of the country where we transfer your data are not recognised as being equivalent to those in the UK, we will ensure that the recipient enters into a formal legal agreement that reflects the standards required.

You have the right to ask us for more information about these safeguards, and can do so by using the contact details set out earlier in this notice.

## 8. Retaining personal data

We retain personal data to meet a number of legal and regulatory requirements, as well as our own legitimate business interests. In most cases we will retain your personal data for 8 years following the end of our relationship with you, however depending on the service you have received from us we may need to retain your personal data for longer.

## 9. Your rights

Data protection law gives you rights relating to your personal data. Should you wish to enforce a right (generally at no cost to you), or make a data protection complaint, please use the contact details set out earlier in this notice. We aim to provide a final response within one month of receiving a request, unless the request is particularly complex in which case we will let you know when we expect to complete it by:

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<b>Access</b>	You have a right to request a copy of the personal data that we hold on you, along with meaningful information on how it is used and who we share it with, however there are some instances where we may not be able to provide you with some or all of the information we hold. Where this is the case we will explain to you why when we respond to your request, unless the relevant laws or regulations prevent us from doing so.
<b>Rectification</b>	You have a right to ask us to correct inaccurate or incomplete personal data that we hold about you. We will either confirm to you that this has been done, or if there is a valid reason that this cannot be done, we will let you know why.
<b>Erasure</b>	You can request that we delete your personal data in certain circumstances, for example if we no longer need the personal data for the purpose(s) for which we collected it. We will either confirm to you that this has been done, or if we are unable to delete it due to a compelling overriding reason we will let you know why.
<b>Restrict processing</b>	You can ask us to restrict the processing of your personal data in certain circumstances. If you do so, we will either confirm that this has been done, or if we are unable to do so, we will let you know why.
<b>Data portability</b>	In certain circumstances you have the right to request that your personal data be transferred to yourself or a nominated third party in a common, machine readable format. If you request this, we will either act upon your instruction and confirm to you that we have done so, or if there is a valid reason that this cannot be done, we will tell you why.

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**Object to direct marketing**

Please note that while this right exists under data protection law, we do not undertake marketing

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**Object to our legitimate interests**

Where we process your personal data to achieve a legitimate business interest of ours, for example those described under Section 6, you have the right to challenge this. If you do so, we will either confirm to you that the processing has stopped, or explain why we believe our interest in the relevant activity outweighs your interest.

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**Object to automated decision-making**

Please note that while this right exists under data protection law, we do not undertake automated decision-making

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Should you submit a request or complaint to us and remain unhappy with our response, you may raise a complaint directly with the ICO whose contact details can be found at [www.ico.org.uk](http://www.ico.org.uk)

