

## Privacy Statement

### Applying to General Insurance Customers

Please take time to read this document carefully as it contains details of the basis on which we will process (collect, use, share, transfer) and store your information. You should show this notice to all parties related to this insurance arrangement. If you have given us information about someone else, you are deemed to have their permission to do so.

If you have any questions or need further information you can e-mail [info@edeninsurance.co.uk](mailto:info@edeninsurance.co.uk)

### Company Controller and Contact Details

Eden Insurance Services Ltd, 6 King Street, Clitheroe, Lancs, BB7 2EP Tel: 01200 453920 Email: [info@edeninsurance.co.uk](mailto:info@edeninsurance.co.uk)

Eden Insurance Services Ltd is authorised and regulated by the Financial Conduct Authority. Our Firm Reference Number (FRN) is 308350. You can check this on the FCA register by visiting the FCA's website [www.fca.org.uk](http://www.fca.org.uk) or by telephoning the FCA on 0800 1116768.

### Data Controller and Data Processor

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)

The contractual arrangements we have in place with our suppliers (e.g. Insurance Companies, our Client Database software provider, and similar providers of services to us, including other third-party companies who use our services), are governed by and shall be deemed to operate strictly in accordance with the terms of such contracts. Importantly, from your perspective these contracts set out to define how data will be processed between us, including circumstances when we act as a processor or controller as is required by the GDPR.

When acting as a controller of your data, we will, in certain circumstances determine the purposes and means of processing your data; in particular this will include the data processed by brokers who use our services.

### Lawful Bases

#### Collecting information about you

When we collect information about you, we may collect personal data which may include a variety of information about an individual (e.g. their name, address of residence, communication and contact details, and other personal information such as a date of birth). Where relevant to do so we may also collect information relating to an individual, indirectly by reference to an identifier (e.g. an IP address, which is a unique number identifying your computer, laptop or similar portable device).

Where required and appropriate to so, we will also collect more sensitive personal information (such as details about an individual's motoring or criminal convictions, details of health, credit worthiness and other similarly sensitive information).

In certain circumstances (e.g. when an Insurance Company or similar provider of services to us requires us to do so) we will collect information from a variety of different sources (e.g. publicly available sources, such as social media and networking sites; third party databases generally available to the financial services sector, and the wider commerce and industry including, MGA's, Lloyd's of London, claims management firms, loss adjusters and or other suppliers appointed in the process of handling a claim or credit reference and similar agencies), this may include information from you regarding your past insurance policies and arrangements.

#### Using information about you

We will use information, including sensitive information, about individuals, and other parties related to this insurance, because it is principally:

- a) necessary for the performance of or to take steps for an individual to enter into a contract of insurance; or
- b) it is necessary for compliance with a legal obligation; or
- c) it is necessary to protect the vital interests of a data subject or another person; and
- d) necessary for our own legitimate interests or those of other controllers or third parties (e.g. to search at credit reference agencies, monitor e-mails, calls and other communications or for market research, analysis and developing statistics) except where such interests are overridden by the interests, rights or freedoms of the data subject.

These bases include, providing an insurance quotation, arranging and placement of a policy or underwriting facility, and providing administration through-out the lifecycle of an insurance arrangement as well assisting with making a claim.

In certain circumstances, such as when a quotation is requested, or changes are made to an existing policy or at each renewal of an insurance arrangement, our assessment may involve a decision to determine whether we are able to provide an insurance arrangement.

We will also use your information when there is a justifiable reason for doing so, such as compliance with legal obligation

(e.g. for the prevention and detection of fraud and financial crime.)

### Sharing your information

We will share information, including sensitive information, about you, and other parties related to this insurance because it is:

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

This includes sharing your information with carefully selected third parties providing a service to us or on our behalf, these include, our Insurance Providers, (you can write to our Compliance Department should you wish to view a list of all the insurance companies with whom we have arrangements), and or Premium Credit Limited (who are our selected finance providers governed by consumer credit legislations).

### 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.

### How long we will keep information

We will only keep and or maintain information about an individual for as long as is necessary in providing our products and services or for compliance with a legal or regulatory obligation, including our legitimate interests or of a controller.

This means, we will only keep, information that is necessary to keep so that we can sufficiently deal with administrative issues, queries, claims and or for compliance with legal reasons; usually we will keep information for a minimum retention period of 7 years and or maximum period of 40 years, after cessation of a product or service we have provided.

However, we will keep information for much shorter periods if that information related merely to a quotation which did not then result in a contract of insurance being arranged; in these circumstances we will keep information for a minimum retention period of 12 months and or maximum period of 2 years unless such information becomes manifestly out-of-date in which case we may keep quotation information for shorter periods.

In any event all information shall be stored in strict compliance with the GDPR legislation at all times; and using appropriate technical or organisational measures we will regularly:

- a) review the length of time we keep and or maintain information about you;

- b) consider the purpose or purposes why we hold the information about you in deciding whether (and for how long) to retain it;
- c) securely delete information about you that is no longer needed for this purpose or these purposes; and
- d) update, archive or securely delete information about you if it goes out of date.

### 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:

- a) necessary for the performance of or to take steps for you to enter into a contract of insurance; or
- b) necessary for compliance with a legal obligation
- c) necessary to protect your vital interests;
- d) necessary for our own legitimate interests or those of other controllers or third parties; and
- e) 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:

- a) about an individual's health including medical conditions;
- b) motoring or other criminal convictions; and
- c) racial or ethnic origin or religious beliefs.

We will always apply additional organisational and technical measures for this category of data, including restrictions to access this data (this is where data may be secured with additional layers of security to prevent misuse and protect personally identifiable information).

### Use and storage of your information overseas

We will never knowingly transfer, store, or process information about you or an individual, outside the European Economic Area (EEA). In any event, if we are compelled to transfer your information outside the EEA (e.g. because it is an insurance arrangement with an Insurance Company who is outside the EEA or part of a larger group of companies who pass information outside the EEA) it shall be in compliance with the conditions for transfer set out in the GDPR and or restricted to a country which is considered to have adequate data protection laws. All reasonable steps shall typically have been undertaken to ensure the firm to which information is being transferred has suitable standards in place to protect such information.

### 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 the website and you will typically have to accept the cookie to benefit from the services the 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 primarily enable the website to remember an individual's preferences, recording information the individual may have entered into the web pages.

These same rules also apply if any individual accesses or uses any other type of technology to gain access to information stored electronically by us (e.g. using a smartphone or similar portable device).

## Individual Rights

Individuals have a number of rights relating to the information we hold these rights include but are not limited to:

- a) a copy of the personal information we hold (once requested, we have a maximum of one month to give an individual such information);
- b) rectify information, if it is inaccurate or incomplete;
- c) request the deletion or removal of an individual's personal data where there is no compelling reason for its continued processing;
- d) suppress processing of an individual's personal data, when processing is restricted, we are permitted to store the personal data, but not carry out further processes. We will retain sufficient information about the individual to ensure that the restriction is respected in future (see Marketing);
- e) object to certain uses of an individual's personal information (see Marketing);
- f) withdraw any permission you or an individual may have previously provided; and
- g) complain to the Information Commissioner's Office at any time if you or an individual is not satisfied with our use of such information.

Individuals can request a copy of the personally identifiable information we hold by contacting us about them, including the right to have such information in a portable form '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, sometimes in a CSV format, should an individual require it in that format to ensure information can be exchanged easily with other organisations.

If you would like further information or wish to make a Subject Access Request (SAR) you can e-mail [richard@edeninsurance.co.uk](mailto:richard@edeninsurance.co.uk)

## Marketing

When marketing to you as an individual (including, individual sole traders and partnerships), we will either rely on the permission we have (if we are able to do so) or we will 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;

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

We will typically ask for permission when you first contact us, however, you will maintain the right to easily withdraw such consent when-ever you wish (unsubscribe). We will regularly

review any such consent to check that your relationship with us and any processing including the purposes have not changed.

In all situations where we market to a business we will observe both the market standards and those rules and guidelines of the Privacy and Electronic Communication regulations (PECR).

We have in place such a process to ensure we refresh your consent at appropriate intervals, including any parental, or third-party consents (where relied upon) and act on withdrawals of consent (unsubscribe) as soon as we can and not penalise you if you choose to give and later decide to withdraw your consent.