

# Privacy Statement

## About Us

This Privacy Statement is provided by C&C Healthcare Ltd who are an Appointed Representative of C&C Insurance Brokers Ltd, Bridge House, 80-82 Compstall Road, Romiley, Stockport, Cheshire SK6 4DE who are authorised and regulated by the Financial Conduct Authority under firm reference number 309053. The main switchboard number is 0161 406 4800.

We are acting as a Controller in respect of your personal data in carrying out our contractual services on behalf of our clients - it is therefore our responsibility to ensure that any sharing or processing of this data is compliant with the General Data Protection Regulations.

A data 'controller' means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data 'processor' means the individual or organisation which processes personal data on behalf of the controller.

For us to arrange a policy, we need to collect and process certain information about the policyholder and those who will be covered on the policy to. In addition, to administer a claim we will need to collect and process certain information about the claimant and other people involved. The lifecycle of your insurance may involve sharing your personal data with other companies within our group and other market participants, some of which you may not have direct contact with.

## The purpose of this Privacy Statement

This Privacy Statement is designed to help you understand what kind of information we collect in connection with our products and services and how we will process and use this information. In the course of providing you with products and services we will collect and process information that is commonly known as personal data.

This Privacy Statement describes how we collect, use, share, retain and safeguard personal data.

This Privacy Statement sets out your individual rights; we explain these later in the Statement but in summary these rights include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.

We will process your personal data in line with:

- The UK's updated Data Protection Act 2018, which was initially the UK's enactment of the EU GDPR
- The UK retained provisions of the EU's General Data Protection Regulation ('UK GDPR') (retained by virtue of the European Union (Withdrawal) Act 2018)
- Regulations based on wider EU legislation such as the Privacy and Electronic Communications Regulations (EC Directive) 2003 (PECR) and future updates.

Wider guidance from the Information Commissioners Office – [www.ico.org.uk](http://www.ico.org.uk)

## How we obtain personal data from you

We may obtain and process personal data from you via our website, from you directly by telephone, face to face, or e mail or written correspondence such as a claim form. Occasionally we may obtain your personal data from your employer, third party organisations or individuals with whom you have agreed to share your information. We may also receive it from insurers, other insurance intermediaries, firms handling claims and finance providers.

## The personal data that we collect and hold

Depending on the products or services we supply to you, or your employer or the nature or capacity within which we access, receive or administer your products or services, we may collect and hold the following data:

Name, address, contact details including email, telephone, gender, marital status, date and place of birth, racial or ethnic origin. Employer detail, job title and employment history will be obtained and details of beneficiaries or claimants in relationship to the policyholder. Driver's licence, social security, national insurance and passport details will be taken where necessary.

Bank account number, sort code, income, tax identification and other financial information will be retained and any fraud or criminal convictions or allegations of crime, including driving offences. Sanctions relating to anti-fraud databases or law enforcement agencies may be obtained. Current and previous claims information including health data.

Medical conditions, health status, injury, disability and medical procedures performed may be obtained relating to relevant policies. Details relating to habits such as smoking or alcohol consumption may be obtained, as well as prescription and medical history. Where insurers require genetic or biometric data this may also be obtained.

Information about your use of our website such as your IP address, which is a unique number identifying your computer, including personal data gathered using cookies.

## Purpose of processing and lawful basis

In providing your personal data you acknowledge we will process your data for the specific purpose of obtaining and administering insurance products and other related services from us or insurers. This processing is necessary for yours or your employer's legitimate interests to enable us to administer these policies on your behalf. It is also necessary to enable us to take specific steps before you enter into a contract. We will process your personal data for the purpose of marketing either our own or carefully selected third party providers, only if you have consented to receive this or we believe it is in your legitimate interest.

In order to arrange insurance cover and administer insurance claims, in some circumstances, we might need to process special categories of personal data, such as medical records and criminal convictions – we will gain your consent to do this either directly to ourselves or through another party if relevant.

If we are relying on a basis other than consent:

Purpose for which we process your data	The legal basis upon which we can do this
In order to perform our contractual obligations to you. This includes us fulfilling your requests for insurance services (including obtaining insurance for you, fulfilling requests for mid-term adjustments and obtaining renewals)	The processing is necessary in connection with any contract you may enter in to with us
To let you know about similar products and services that we feel may be of interest to you	The processing is necessary to pursue our legitimate interest in operating our business
To assist in the prevention and reduction of financial crime (including Fraud)	The processing is necessary for us to comply with the law and our own legal requirements
'Special categories' of data	The processing is necessary for reasons of substantial public interest relating to insurance purposes
To administer your account, including financial transactions	The processing is necessary in connection with any contract you may enter in to with us

## How we use your personal data

We use your personal data for the following purposes:

- To provide insurance quotations which may include fraud, anti-money laundering and sanctions checks, and subsequently accepting cover on your behalf.
- For the general administration of policies, including the collection or refunding of premiums, paying of claims, processing and facilitating other payments.
- Managing any claims including the defence or prosecution in any litigation, investigating and prosecuting fraud.

- Contacting you in order to arrange the renewal of a policy

These activities will involve us sharing your personal data with insurers and may involve our sharing it with other insurance intermediaries, advisers, agents, contractors, and service and finance providers. This is normal practice within the insurance industry where it is necessary to share information in order to place, quantify and underwrite risks, to assess overall risk exposure and to process claims. It is also necessary to determine the premium payable and to administer our business.

We may retain and disclose your personal data in order to comply with any statutory, legal or regulatory obligations. We are required to report any suspicious transactions to the National Crime Agency (NCA) and may need to provide them with information including your personal data or related organisations. Similarly, we may also need to disclose information about our clients, including personal data, to certain bodies that have statutory powers, for example, the Department of Work and Pensions.

We may use your data to provide you with marketing, newsletters or promotional materials, if you have opted to receive these communications.

We do not sell your personal data to any other organisations or transfer it outside the EU and we do not use automated decision making including profiling.

### Retention period

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

### Individual's rights

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data.

These rights are known as Individual Rights under the Data Protection Act 2018. The following list details these rights:

- The **right to be informed** about the personal data being processed;
- The **right of access** to your personal data;
- The **right to object** to the processing of your personal data;
- The **right to restrict** the processing of your personal data;
- The **right to rectification** of your personal data;
- The **right to erasure** of your personal data;
- The **right to data portability** (to receive an electronic copy of your personal data);
- Rights relating to automated decision making including profiling.

Under data protection law you have the right to change or withdraw your consent. Where we have no legitimate reason to continue to hold your information, you have the right to be forgotten. (Please note that your right for your Personal Data to be erased could be overridden by policy terms and conditions and our regulatory and legal based compliance requirements to retain such data).

In exercising your Individual Rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for taxation, prevention of crime and for regulatory and other statutory purposes.

You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

The flow of data within the insurance sector is complex and we ask you to keep this in mind when exercising your 'rights of access' to your information. Where we may be reliant on other organisations to help satisfy your request this may impact on timescales.

If you require further information on your Individual Rights or you wish to exercise your Individual Rights, please contact please contact the Head of Compliance at [compliance@cc-insure.com](mailto:compliance@cc-insure.com)

If you wish to inform us of changes in consent for marketing please contact us using the address or telephone number indicated in any recent correspondence or emails you have received from us. Further details of your rights can be obtained by visiting the ICO website at <https://ico.org.uk>

Should you wish to obtain, transfer, update, rectify or delete your data please send your request to [compliance@cc-insure.com](mailto:compliance@cc-insure.com). Upon receipt, your request will be actioned within one calendar month.

### **Security and Protecting your data**

The security of your personal information is important to us. We have in place appropriate safeguards relevant to the sensitivity of the information we maintain and will take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data. Data will only be provided to those who lawfully require information for legitimate and relevant business needs.

### **How to complain**

We are committed to complying with all relevant data protection legislation including the General Data Protection Regulations and Privacy and Electronic Communications Regulations

Should you wish to make a complaint about any aspect of the processing of your personal data please contact the Head of Compliance at [compliance@cc-insure.com](mailto:compliance@cc-insure.com)

If you are not happy with our response, you may contact the ICO directly on 0303 123 1113 or via their website [ico.org.uk](http://ico.org.uk)

### **How to contact us**

If you have any questions regarding this Privacy Statement, the use of your data or your Individual Rights please contact the Head of Compliance at C&C Insurance Brokers Ltd, Bridge House, 80-82 Compstall Road, Romiley, Stockport, Cheshire SK6 4DE or by e-mailing [compliance@cc-insure.com](mailto:compliance@cc-insure.com) or by telephoning 0161 406 4800.