

PRIVACY NOTICE

WHO WE ARE

Callaway and Sons Insurance Consultants Limited are authorised and regulated by the Financial Conduct Authority. We are a registered company in England and Wales No. 3914955.

Our registered and office address is: 56 New Writtle Street, Chelmsford, Essex CM2 0SE

Telephone: 01245 265838

Email: info@callaways-web.co.uk

Website: www.callawayinsurance.co.uk

THE PURPOSE AND BASIS FOR OUR LAWFUL PROCESSING OF YOUR DATA

When you contact us you will be expecting us to provide you with a quotation for an insurance product that you have selected.

We do not require your consent in order to process the information you provide to obtain quotations on your behalf, as the processing of the information is necessary for the performance of the contract with you, or in order to enable us to take steps to enter into a contract with you.

Therefore, by completing any forms or requesting a quotation either over the telephone or by electronic means, we have a legal basis for processing your personal data to fulfil your needs.

We collect, use and store your personal information in order to fulfil requests for quotes, products and services as part of our insurance broking, claims handling and risk management business. It may also be used to verify your identity and to enable us to carry out anti-money laundering and other financial crime checks where required. If you pay by instalments your information may also be used to arrange credit.

With your consent, your data may also be used to help us assess your ongoing needs, to inform you about products and services that meet those needs, to communicate with you, to administer your account with us and to carry out internal data analysis.

We may monitor calls, emails, text messages and other communications with you.

Please show this notice to anyone else whose personal information you will be providing to us.

TRANSFER OF YOUR PERSONAL INFORMATION TO THIRD PARTIES

It is not our company's policy to sell or pass on your information to third parties for marketing purposes.

If you do take out an insurance policy with us, in order to ensure the performance of the contract you have entered into, it will be necessary to pass your personal information on to your insurance company, their representatives and business partners such as loss adjusters or legal firms involved in the claims handling process.

TYPES OF DATA AND AUTOMATION

Data will only be used in connection with the insurance product you have purchased from us. If this is not the case then we will ask for your specific permission for the information to be used differently, for which you must consent in order for us to do so.

We collect personal information such as name, contact details, date of birth, gender, marital status, financial details, employment details and other personal details depending on the nature of the insurance and other services we offer.

You understand that we may also collect, use and store sensitive personal information such as criminal convictions and medical conditions as necessary in relation to insurances such as motor, home, travel and health insurance. However, we will not request or store certain sensitive personal data such as your ethnicity, sexual orientation etc.

If you provide personal information about other individuals (such as employees, named drivers, family members etc.), you must obtain their consent prior to disclosing it to us.

You understand and give your explicit consent that we may disclose your information to relevant other parties for the purposes described in this Notice.

There is no significant automated decision making used by ourselves, but may be by your Insurers – please refer to their Privacy Notice for further details.

DATA TRANSFER TO COUNTRIES OUTSIDE THE UK

We do not transfer your data outside of the United Kingdom other than when it is stored on a cloud server. If this is the case, your data will only be stored in an approved EEA member country, as it is against the FCA rules for personal data to be stored outside of this jurisdiction.

We undertake appropriate due diligence when dealing with Cloud Providers as required by our Regulator – the FCA.

RETENTION PERIODS

It is our policy to only keep records of your personal data for as long as required by the Financial Conduct Authority, The Companies Act or other legislation, whichever requirement is longer. Our retention records are currently as follows:

Customer files and records – 40 years after expiry of annual or short period contract, or claim settlement.

Customer Complaints files – 7 years after the finalising of any complaint.

Prospective customer data – 2 years

YOUR RIGHTS

The General Data Protection Regulation provides the following rights for you as individuals.

- 1) The right to be informed
- 2) The right of access
- 3) The right to rectification
- 4) The right to erasure
- 5) The right to restrict processing
- 6) The right to portability
- 7) The right to object
- 8) Rights in relation to automated decision making and profiling

THE RIGHT TO BE INFORMED (IN BRIEF)

The right to be informed encompasses our obligation to provide fair processing, typically through a Privacy Notice such as this. It emphasises the need for transparency over how we use your personal data.

THE RIGHT OF ACCESS (IN BRIEF)

Under the General Data Protection Regulations you have the right as an individual to obtain:

- Confirmation that your data is being processed
- Access to your personal data
- Other supplementary information – this largely corresponds to the information that is provided in a Privacy Notice such as this

THE RIGHT TO RECTIFICATION (IN BRIEF)

You as an individual are entitled to have personal data rectified if it is inaccurate or incomplete.

If we have disclosed your personal data which has to be rectified to third parties we must inform them of the rectification where possible.

THE RIGHT TO ERASURE (IN BRIEF)

The right to erasure is also known as the right to be forgotten. The broad principle underpinning this right is to enable you as an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

THE RIGHT TO RESTRICT PROCESSING (IN BRIEF)

Under the previous Data Protection Act individuals have the right to block or suppress the processing of personal data. The restriction of processing under the GDPR is similar.

When processing is restricted we are permitted to store your personal data but not further processing. We can retain just enough information about you as an individual to ensure the restriction is respected in the future.

THE RIGHT TO DATA PORTABILITY (IN BRIEF)

The right to data portability allows you as an individual to obtain and re-use your personal data for your own purposes across different services. It allows you to move, copy or transfer your data easily from one IT environment to another, in a safe and secure way without hindrance to user ability.

However, we can only offer data portability where we are able to – at the moment this would include providing you with proof of your claims history, policy history etc. and this would be provided to you to pass onto a Third Party. We are unable to exchange other data we hold due to system restrictions.

THE RIGHT TO OBJECT (IN BRIEF)

You as an individual have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling)
- Direct marketing (including profiling)
- Processing for the purposes of scientific/historical research and statistics

Please note we, as a company, do **not** undertake any of these types of data processing.

RIGHTS IN RELATION TO AUTOMATED DECISION MAKING AND PROFILING (IN BRIEF)

The GDPR provides safeguards for you as an individual against the risks that can potentially damage a decision taken without any human intervention. These rights work in a similar way to your existing rights under the previous Data Protection Act.

As a company we do not make any automated decision making using profiling, so this would not apply to ourselves.

I NO LONGER WISH TO RECEIVE INFORMATION FROM YOU OTHER THAN IN RELATION TO THE INSURANCE PRODUCT I HAVE PURCHASED

Where you have opted in to receive information about the other products we offer or other such information where we have previously received your consent, you may withdraw this at anytime by contacting us by telephone or by email using the contact details below:

Telephone: 01245 265838

Email: info@callaways-web.co.uk

I WISH TO BE FORGOTTEN

You have a right under the General Data Protection Act to be removed from our records. However, we can only remove your information from our systems once our regulatory requirements have been fulfilled.

You may request deletion of your data by contacting us using the details and methods below.

If we are unable to remove your records due to data retention periods, this will be disclosed to you at the time of your request, or you can refer to the information provided above.

Telephone: 01245 265838
Email: info@callaways-web.co.uk

I WISH TO MAKE A COMPLAINT

If you wish to make a complaint about the way we hold your personal data, in the first instance please write to Mr Jim Callaway, Director, Callaway and Sons Insurance Consultants Ltd, 56 New Writtle Street, Chelmsford CM2 0SE. In the event that we are unable to satisfy your complaint, you are able to complain to the Information Commissioners Office:

Telephone: 0303 123 1113
Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Website: www.ico.gov.uk

COOKIES

We use Cookies to store session information so that we can identify you for quotation purposes and for retrieval by you of your previous quotation data. This information is also used for payment purposes using the HSBC secure e-payments.

EXTERNAL SITE LINKS

Our websites do link to other websites on the internet such as Twitter, Facebook, etc.

Content and Privacy Policies are the responsibility of their respective owners and it will be made clear to you when you are leaving our website when we are sending you to another.

ADVERTISERS

We do not have any third party advertising on any of our websites.

IP ADDRESSES & LOGIN

We log information about visitors including your IP address, date and time visited, referring website, length of stay etc. This information is purely used for visitor analytics only and we do not store personal data along side this information.

CREDIT CARD TRANSACTIONS

It is our policy not to store any details of your credit card. We use Lloyds Bank plc, one of the UK's leading banks that process your payment on our behalf. We send them very limited information including the amount of the transaction to be created, your card details and address identifier. All other information is undertaken by Lloyd's and is not stored or sent back to us and therefore remains fully secure.

QUESTIONS AND CONCERNS

If you have any questions or concerns about our Privacy Policy or the General Data Protection Regulation, please do not hesitate to contact us.

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