



Privacy Notice

About us

We, CCRS Brokers Limited, (also referred to as “we”, “us”, or “our”) are a registered company in Scotland (Company Number SC345403). Our registered address is 15 Newton Place, Glasgow G3 7PY.

The purpose of this notice

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

This Notice sets out your individual rights; we explain these later in the Notice 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.

What is personal data?

Personal data is information relating to an identified or identifiable natural person. Examples include an individual’s name, age, address, date of birth, their gender, contact details, salutation, job title, preferences and interests.

Personal data may contain information which is known as special categories of personal data. This may be information relating to an individual’s race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation.

Personal data may also contain data relating to criminal convictions and offences. For the purposes of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data, where we are legally required to comply with specific data processing requirements.

Personal data we collect

In order for us to advise on, quote for, arrange and administer insurance and services ancillary to your insurances (and in arranging insurance premium finance where applicable) for you we will collect and process personal data about you. We will also collect your personal data where you request information about our services, events, promotions and campaigns.

We may also need to collect personal data relating to others in order to advise on, quote for, arrange and administer insurance (and services ancillary to insurance). In most circumstances, you will provide us with this information. Where you disclose the personal data of others, you must ensure you are entitled to do so.

You may provide us with personal data when completing online quote or contact forms, when contact is made via the telephone, text, picture or video messaging, participating in online chats, via social media messaging, when creating or amending user account and log in details for online services, during meetings, risk audits or surveys (whether face to face or remote), participating in customer surveys, when writing to us directly or where we provide you with paper or electronic based forms for completion or we complete a form in conjunction with you.

We may also collect personal data from publicly available sources in order to advise on, quote for, arrange and administer insurance (and services ancillary to insurance). Examples may include Companies House, Health and Safety Executive, HM Treasury List of Consolidated Targets, information from your website and information on social media platforms.

We will share your personal data within CCRS Brokers Limited and with business partners. 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 also share personal data with authorised third parties, this is necessary where we are required to do so by law, where we need to administer our business, to advise on, quote for, source, place and administer your insurances and services ancillary to your insurances (for example, insurance premium finance), to perform underwriting activities and to process claims. Some examples are as follows:

- Insurers;
- Reinsurers;
- Underwriting agencies and/or managing general agencies;
- Lloyd's of London syndicates;
- Insurance brokers including wholesale brokers and Lloyd's of London brokers;
- Premium finance providers;
- Credit reference agencies;
- Debt recovery agencies;
- Claims handling companies;
- Claims management companies;
- Claims repair, rebuild, replacement and the like service providers;
- Claims rehabilitation service providers;
- Loss adjusters;
- Loss assessors;
- Public relations service providers;
- Solicitors and legal services providers;
- Accountants and/or auditors;
- Sanctions screening service providers;
- Health and safety service providers;
- Risk management service providers;
- Business continuity service providers;
- Compliance service providers;
- IT service providers;
- Inspection service providers;
- Surveyors;
- Professional and/or trade bodies; and
- Regulators.

We will collect your personal data when you visit our websites, where we will collect your unique online electronic identifier; this is commonly known as an IP address.

We will also collect electronic personal data when you first visit our website where we will place a small text file that is commonly known as a cookie on your computer. A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes, and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our websites in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We may record your communications with us when contacting our complaints and other customer focused functions.

Where we collect data directly from you, we are considered to be the controller of that data i.e. we are the data controller. Where we use third parties to process your data, these parties are known as processors of your personal data. Where there are other parties involved in underwriting or administering your insurance (and services ancillary to insurance) they may also process your data in which circumstance we will be a joint data controller of your personal data.

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.

As a provider of insurance services, we will process the following categories of data:

- Personal data such as an individual's name, age, address, date of birth, their gender, contact details, salutation, job title, preferences, interests, personal circumstances relevant to material facts disclosure and underwriting information and/or details of historic claims;
- Special categories of personal data such as sexual orientation, health and/or details on historic claims resulting in injury, illness or disease (physical, physiological and/or psychological); and
- Data relating to criminal convictions and offences (including driving / motoring offences).

If you object to the collection, sharing and use of your personal data we may be unable to provide you with our products and services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

If you require more information about our insurance processes or further details on how we collect personal data and with whom we share data with, please contact our Compliance Manager by e-mailing brokingteam@ccrsbrokers.com or by writing to CCRS Brokers Limited, 15 & 16 Newton Place, Glasgow G3 7PY.

Links to other websites

Our websites may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site(s), you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Why do we need your personal data?

We will use your personal data for the performance of our contract with you, to advise on, quote for, provide you with insurance products and services, to process claims and renewals, to administer your policy and our business, to respond to any requests from you about services we provide and to process complaints. We will also use your personal data to manage your account, perform statistical analysis on the data we collect, for financial planning and business forecasting purposes and to develop new and market existing products and services.

We will use the special category and criminal conviction data we collect about you for the performance of our contract with you and/or which is deemed to be necessary for reasons of substantial public interest. This allows us to advise on, quote for and provide you with insurance products and services (and services ancillary to insurance), to process claims and renewals and to administer your policy (and ancillary services).

In purchasing our products and services you should understand that you are forming a contract with us. If you contact us for a quote or request details on the services we provide, we consider ourselves as having a legitimate business interest to provide you with further information about our services.

In some situations we may request your consent to market our products and services to you, to share your data or to transfer your data outside the European Economic Area. Where we require consent, your rights and what you are consenting to will be clearly communicated to you. Where you provide consent, you can withdraw this at any time by contacting our Compliance Manager by e-mailing brokingteam@ccrsbrokers.com or by writing to CCRS Brokers Limited, 15 & 16 Newton Place, Glasgow G3 7PY.

Where you have requested a quote (or have otherwise contacted us for details of our products and services or requested our advice on an insurance or ancillary service matter where you are not a customer of us), we will retain your personal data for 10 years. Where you make a complaint we will retain the data for 10 years. Where you or law enforcement agencies inform us about any active investigation or potential criminal prosecution, we will comply with legal requirements when retaining this data.

The duration we will retain your personal data at the end of any contractual agreement will be dependent on the nature of the insurance cover arranged or ancillary service provided. For classes of insurance cover which could result in injury, illness or disease claims being made at a future date, we will retain your personal data for a period of 40 years. For classes of insurance cover which could allege responsibility for losses as a result of past actions, errors, omissions or legal liability, we will retain your personal data for a period of 40 years. For other classes of insurance and for ancillary services provided we will retain your personal data for a period of 10 years.

Where you have submitted a claim (or a third party has submitted a claim under your insurance policy or an incident or circumstance which may give rise to a claim is reported), the duration we will retain your personal data at the end of any contractual agreement will be dependent on the nature of the claim. Where a claim involves (or is alleged to involve or could involve) an individual being injured and/or suffering an illness or disease (physical, physiological and/or psychological), we will retain your personal data for 40 years. Where a claim relates to marine losses where there may be future salvage we will retain your personal data for 80 years. For other types of claim we will retain your personal data for a period of 10 years.

We will retain special category and criminal conviction data at the end of any contractual agreement for a period of 10 years unless this is in the context of a class of insurance cover or claim type as referenced above in which case we will retain the data for the same time period as stated above.

The retaining of data is necessary where required for contractual, legal or regulatory purposes or for our legitimate business interests and product development and marketing purposes.

Sometimes we may need to retain your data for longer, for example if we are representing you or defending ourselves in a legal dispute or as required by law or where evidence exists that a future claim may occur.

We do not use automated decision making services, tools and/or techniques to check for customer suitability to our products or services, however authorised third parties we share personal data with may do so (for example to check against an insurer's acceptable risk criteria or a premium finance provider carrying out a credit search to check an individual's solvency and credit rating). We will (and authorised third parties may) analyse data to identify products and services which customers may be interested in. This is commonly known as profiling. You have the right to object to the use of profiling activities and the use of automated decision making services, tools and/or techniques.

Please contact our Compliance Manager by e-mailing brokingteam@ccrsbrokers.com or by writing to CCRS Brokers Limited, 15 & 16 Newton Place, Glasgow G3 7PY or by telephoning 0141 212 8820 if you object to the use of, or you have any questions relating to the use of, your data, the retention of your personal data. You can opt out of receiving marketing services by e-mailing brokingteam@ccrsbrokers.com .

International transfers of personal data

While CCRS Brokers Limited are solely based in the United Kingdom we utilise the services of specialist IT service providers to process and store data. By their nature, such specialist IT service providers are likely to have international operations with data stored in a jurisdiction which may be outside of the United Kingdom and/or outside of the European Economic Area. Authorised third parties with whom we share data may themselves transfer this outside of the United Kingdom and/or outside of the European Economic Area (for example, many insurers have operations and/or outsourcing arrangements based outside of the European Economic Area where data could be held and processed). This international transfer of personal data is necessary for the purposes of administering our business and underwriting and claims processing purposes. Such parties are not permitted to use your personal data for any other purpose than for what has been agreed with us. These parties are also required to safeguard your personal data through the use of appropriate technical and organisational data security measures and are prohibited from disclosing or sharing your data with other third parties without our prior authorisation, or unless as required by law.

Please contact our Compliance Manager by e-mailing brokingteam@ccrsbrokers.com or by writing to CCRS Brokers Limited, 15 & 16 Newton Place, Glasgow G3 7PY or by telephoning 0141 212 8820 for a list of countries and organisations your personal data is transferred to and/or for further information on the measures undertaken to safeguard your data.

Your 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); and
- Rights relating to automated decision making including profiling.

Individuals can exercise their Individual Rights at any time. As mandated by law we will not charge a fee to process these requests, however if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

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 our Compliance Manager by e-mailing brokingteam@ccrsbrokers.com or by writing to CCRS Brokers Limited, 15 & 16 Newton Place, Glasgow G3 7PY.

Protecting your data

We will take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data, including when sharing your data within CCRS Brokers Limited and authorised third parties.

Data Privacy Representative

To ensure data privacy and protection has appropriate focus within our organisation we have a Data Privacy Representative who reports to our senior management team. The Data Privacy Representative's contact details are as follows:

The Compliance Manager
CCRS Brokers Limited
15 & 16 Newton Place
Glasgow
G3 7PY
Telephone – 0141 212 8820
E-mail – brokingteam@ccrsbrokes.com

Complaints

If you are dissatisfied with any aspect of the way in which we process your personal data please contact our Compliance Manager by e-mailing brokingteam@ccrsbrokers.com or by writing to CCRS Brokers Limited, 15 & 16 Newton Place, Glasgow G3 7PY or by telephoning 0141 212 8820. You also have the right to complain to the UK's data protection supervisory authority, the Information Commissioner's Office (ICO). The ICO may be contacted via its website which is <https://ico.org.uk/concerns/>, by live chat or by calling their telephone helpline on 0303 123 1113.

Changes to this Privacy Notice

We may amend this Privacy Notice from time to time, for example, to keep it up to date or to comply with legal requirements. You should regularly check this Privacy Notice for updates. If there will be any significant changes made to the use of your

personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our websites.

How to contact us

If you have any questions regarding this Privacy Notice, the use of your data or your Individual Rights please contact our Compliance Manager by e-mailing brokingteam@ccrsbrokers.com or by writing to CCRS Brokers Limited, 15 & 16 Newton Place, Glasgow G3 7PY or by telephoning 0141 212 8820.