

Privacy Notice

1. Welcome

Welcome to our privacy notice (“Privacy Notice”), at Collinson Insurance Services Limited (“we, us, our,”) we respect and commit to protecting your personal data. Our Privacy Notice, together with our Terms and Conditions, will explain how we collect, use, store, share and look after your data:

- a) When you interact or use our website, or
- b) If you use any of our products, services and or applications (together “services”).

For ease, we have divided our Privacy Notice into sections. At the end of our Privacy Notice, we have also included a [Glossary](#) to explain some of the terms mentioned.

2. About Us

Collinson Insurance Services Limited is a company registered in England and Wales with company number 00758979, Registered office address: 5th Floor, 3 More London Riverside, London, SE1 2AQ, United Kingdom and a subsidiary of Collinson International Limited (“Collinson”).

Under Applicable Data Protection Law, we are the Controller of the Personal Data we process.

3. Contact Details

Collinson has appointed a Group Data Protection Officer (“DPO”). If you would like to contact the DPO or the Data Protection Team please contact us by email at dataprotectionteam@collinsongroup.com or by post to The Data Protection Officer, 5th Floor, 3 More London Riverside, London, SE1 2AQ, United Kingdom.

4. Our Global Presence

As a company with a global presence, we are subject to the varying requirements of data protection and privacy regulation and legislation in jurisdictions we operate. We aim to be as consistent as possible and obey all applicable laws and apply the highest standard of data protection and privacy laws to our approach. For example, If you are in the EU, we are bound by EU local laws, including the General Data Protection Regulation (GDPR).

5. Personal Data we collect about you

We will collect Personal Data about you from:

- You e.g., when you register your interest or sign up to use our services or provide us with your marketing preference.

- Our clients or prospective clients send us your Personal Data to allow us to give you access to our services or communicate with you.
- Your devices e.g., when you connect to our website, use our website.
- Through cookies we use on our websites to secure our website.
- Third parties such as social media platforms where you may interact with our social media pages, companies within Collinson assisting us with services we offer you, service providers carrying out services on our behalf e.g., marketing.

The table below outlines the categories of Personal Data we collect and examples of the type.

Categories of Personal Data	Type of Personal Data
Contact details	Name, email address, telephone number, mobile number
Website use data	Please see our cookie policy .
Your communications with us	Any Personal Data you provide us when you contact us. We also record your calls with us. We collect and store all copies of emails sent.
Fraud data	Any suspicious activities and details.

6. How we use your Personal Data

We will use your Personal Data in the following circumstances:

- To provide contracted services
- For our Legitimate Interest (or those of another company), but only when your rights and freedoms do not override our legitimate interest. Our legitimate interest is, to help us improve our services and products and to obtain feedback from you.
- to comply with a legal and regulatory obligation.
- Where we have your consent:

The table outlines the lawful basis we can rely on to process your Personal Data.

What we use your information for	Our legal basis for doing so
To provide you with access to our website and or our mobile app.	To perform a contract, we have with you or about to enter with you.
To manage our relationship with you as a user of the website which includes notifying you about changes to our websites and the services we offer.	Legitimate Interest (to keep our records updated and to study how customer use our product and services).

To provide you with information you have requested, including without limitation, quotations, Service documentation, brochures, and responses to applications.	Where we have your consent.
To respond to any enquiries from you regarding our services.	To perform a contract, we have with you or about to enter with you.
To provide customer support services	To perform a contract, we have with you or about to enter with you.
To protect the company and you from fraud	Legitimate Interest (to prevent and detect fraud and other financial crime)

Other use

- a. We may also keep and use your Personal Data information to comply with our legal obligations, resolve disputes, and enforce our agreements.
- b. We may access, use, and preserve your Personal Data to comply with law, in anticipation of litigation, or to protect our rights or property or those of third parties, even if your Personal Data is subject to a deletion request from you. We may also provide information to law enforcement or authorities to protect the safety of you, other users of our services or others.
- c. *Sale, acquire, merger, or change of ownership.* If we merge with another company, or our equity securities or all or a part of our assets are sold to a third party, your **Personal Data** may be transferred to the buyer or successor entity. We will notify you and other users of any transfer to a different legal entity.

7. How we share your Personal Data

We may share your Personal Data with the following types of companies, (Controllers or Processors) for the reasons explained in section 6.

Companies (Processors) we will share your Personal Data with include:

- IT service providers, data disposal service providers and data storage service providers.
- Companies within the Collinson Group acting as our processor, to help us provide our services to you e.g., our customer service function to handle your enquiries.
- Our providers who host our websites
- Data analytics services

Where we share your Personal Data with our service providers, we enter contracts to ensure they also protect your Personal Data in line with Applicable Data Protection Law and to this Privacy Notice.

Companies (Controllers) we will share your Personal Data with include:

- Companies within Collinson to offer you services or products, where we have your consent.
- Other third parties outside Collinson to offer you services or products, where we have your consent.
- Payment providers
- Fraud prevention agencies, payment service providers, banks, financial institutions and similar third parties for checking your identity, to help protect you and us from fraud, to combat money laundering, protect our website from illegal use, monitor your behavior on our website.

Where we share your Personal Data with these controllers, we will have contracts with them to ensure they only use your data for the services agreed. As controllers they will also have their obligations to protect and secure your data under Applicable Data Protection Law.

We may also share your Personal Data with law enforcement and statutory authorities when required by the law in the following circumstances:

- To comply with a request for information from a governmental body such as law enforcement (police) or other public authorities;
- To comply with a court order to disclose your Personal Data;
- To comply with a regulatory investigation; and
- The establishment, exercise, or defense of a legal claim (including in connection with an investigation or enquiry by a competent regulatory authority).

There are other circumstances where we share your Personal Data:

- Collinson may transfer all your Personal Data to a third party if the operator of the Website changes, or if there is a sale of all or any part of its business or its assets or if we go out of business, enter bankruptcy, or go through some other change of control. In the event of any of these transfers occurring, the party who acquires the data will assume the rights and obligations described in this Privacy Notice.
- We may share your Personal Data with courts, law enforcement, and governmental authorities and other third parties if required by law, subpoena, a directive from a regulatory authority or as otherwise necessary to comply with legal requirements or to protect our rights or property or those of third parties.

We may have links to other sites promoting our partners and clients. Please read their Privacy Notices available on their website to find out how they process Personal Data. This Privacy Notice will not cover their use of Personal Data.

8. International Transfers of your Personal Data

We may send your data to countries outside the UK or the EEA (transfers outside the EEA include transfers to the UK), where different data protection laws may apply. These transfers will only happen when:

- we use service provider companies outside the UK or EEA;
- there is a legal or regulatory obligation; or
- we have your consent.

Where we transfer your data to a service provider company outside the UK or the EEA, we will implement safeguards so that your data continues to be protected. We protect your data by making sure:

- the country has adequacy protection approved by the European Commission or UK; or
- we conduct a security and data protection transfer assessment and put an appropriate contract in place with approved UK or European Commission standard contractual clauses between the company and us.

9. Retention of your Personal Data

We will not keep your Personal Data for longer than is necessary. When defining the retention period, we take several factors into consideration, the type and sensitivity of the Personal Data in question, the reasons why the data was collected and processed, our legal basis for processing the Personal Data, who the Personal Data relates to and their rights and freedom. We also consider any legal and regulatory requirements to keep the data. Where we are the Processor, we will retain and dispose of the information under instructions from the Controller.

When the retention period has expired, we dispose of your Personal Data securely in the following ways, anonymisation of the data, permanent deletion (including all copies) from our systems. For paper records we use of confidential bins and secure disposal by a certified company.

If you opt-out of receiving marketing, some Personal Data will be retained and added to our suppressive list to ensure we do not market to you again.

10. Security of your Personal Data

We use appropriate technical, organisational, and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. We have written procedures and policies regularly audited, and the audits are reviewed at a senior level.

11. Your rights under Applicable Data Protection Law

Under **Applicable Data Protection Law**, you may have certain rights. The table below outlines your rights. If you would like to request to exercise your rights, please email smartdelaysupport@collinsongroup.com. Your request will be reviewed and responded to as quickly as possible.

Your rights:	Meaning:
The right to object to the processing	<p>You have the right to object to the processing of your Personal Data in certain situations.</p> <p>You have an absolute right to stop your Personal Data being used for direct marketing.</p>
The right to information	You have the right to be informed whether and to what extent we process your data. E.g., this Privacy Notice.
The right of access	You have the right to request access to your Personal Data we hold. You also have the right to request a copy, and we will provide you with this unless legal exceptions apply.
The right to rectification	If the Personal Data that we process is incomplete or incorrect, you have the right to request their completion or correction at any time.
The right to Erasure (also known as the “right to be forgotten”)	<p>You have the right to request we delete your Personal Data.</p> <p>This is not an absolute right and only applies in certain circumstances, for example, we cannot delete information if there is a legal or regulatory obligation on us to keep it.</p>
The right to restrict the processing	You have the right to request that we restrict the processing of your Personal Data in certain situations.
The right to data portability	<p>You have the right to request that we provide your Personal Data to you in a machine-readable format.</p> <p>This right can only be used where the processing relies on your consent or contract and is carried out by automated means.</p>
Your rights in relation to automated decision making and profiling	<p>You have the right to object to decisions based exclusively on the automated processing of your Personal Data.</p> <p>We do not engage in profiling, or any processing related to automated decision-making activity.</p>
The right to withdraw your consent	If your Personal Data is processed based on your consent, you have the right to withdraw your consent at any time.

	If you withdraw your consent, this will not affect the lawfulness of how we used your personal data before you withdrew consent, and we will let you know if we can no longer provide you with your chosen service.
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We will keep a copy of any request. Further, we may charge a reasonable fee or refuse to act on a request if such a request is excessive, repetitive, or manifestly unfounded.

If you make a request, where required, we will confirm your identity and ask you to provide us with information to help us deal with your request. We have one month from receiving your request (provided we have verified your identity) to respond.

Please note that for a complex request, we may extend the one month by two months. To exercise your rights please contact smartdelaysupport@collinsongroup.com.

Making a complaint

If you have any questions, concerns, or complaints about this Privacy Notice, please contact our Data Protection Officer or our Data Protection Team at dataprotectionteam@collinsongroup.com

If you are unsatisfied with our response, you can contact the UK's Supervisory Authority, the Information Commissioner at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire, United Kingdom
SK9 5AF

Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

If located within the EU, you can also make a complaint to our lead supervisory authority in Malta at:

Floor 2, Airways House,
Triq Il-Kbira,
Tas-Sliema SLM 1549, Malta

If outside the UK or EU, you can also make complaint to your local privacy supervisory authority where the matter you are complaining about took place.

12. Updates to the Privacy Notice

We keep our **Privacy Notice** under regular review, and we will make new versions available on our **Privacy Notice** page on our website. This **Privacy Notice** was last updated on 1st June 2023.

13. Glossary

Term	Definition
Applicable Data Protection Law	means all applicable worldwide legislation and regulation relating to data protection and privacy including without limitation UK and European Applicable Data Protection Law, the CCPA.
Controller	is a person(s) or company (either alone or jointly or in common with other persons) who decides how Personal Data will be processed.
Criminal Data	Data about criminal proceedings or convictions. Criminal Data should be treated in the same way as Special Category Data.
Legitimate Interest	Processing Personal Data for our activities and needs including providing you with the best service and experience we can offer. We will balance its interests against any possible impact on to you (both positive and negative), your rights or freedom. Where our interest and needs are overridden by your interests, rights or freedom, we will not process your Personal Data (unless you provide us with your consent or required by law).
Personal Data	Information relating to an identifiable person, who can be directly or indirectly identified by reference to an identifier.
Privacy Notice	Also referred to as a Fair Processing Notice) or a Privacy Policy)– Privacy Notice is a document explaining to data subject what Personal Data is processed and how a company will process it
Processor	is an external company or other third parties that collects and processes Personal Data on behalf of a Controller. We undertake activity as both a Controller, and a Processor
Special Category Data	Also referred to as sensitive data, is defined as Personal Data relating to the following, race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation.