

## FAIR PROCESSING NOTICE

1. This Fair Processing Notice tells you what we do with information we collect about you. The notice is addressed to individuals who are users of our services i.e. policyholders, prospective policyholders, website users and third parties. We refer to all these individuals as "customers" or "you" in this notice.

2. We are AB&C Insurance ("we", "us" and "our"), a general insurance broker.

3. We may record and monitor telephone calls for training, regulatory compliance, quality evaluation and verification of information provided and received.

4. When providing an insurance quote or discussing insurance needs we will ask for information about you, such as your name, address, date of birth, occupation, bank and/or credit card details, driving history, previous claims experience and information about your insurance needs, such as car and/or property details, depending on the type of insurance required. This is known as your "Personal Data". We may also ask you for some 'sensitive' information (for example criminal convictions, motoring offences and about your health). This is known as "Sensitive Personal Data".

5. We also collect information about you from other persons and this also forms part of your "Personal Data". This includes information from:

5.1 Policyholders, named persons or other parties acting on your behalf: where you are the holder of a policy or named on a policy we may collect information about you from another person. We will ask them to confirm that they have your consent to provide this information about you. When you provide information on others you must ensure you have their permission to do so.

5.2 Other insurance businesses when we are verifying insurance history and entitlement to a no claims bonus.

5.3 Fraud prevention agencies.

5.4 The police, law enforcement agencies, recognised governing and regulatory bodies.

5.5 Credit reference agencies.

6. We use your Personal Data and Sensitive Personal Data in the following ways:

6.1 To evaluate your request for a quote, provide insurance cover and insurance premium credit facilities

6.1.1 We need to evaluate the level of insurance cover that you need in order to match you to an appropriate policy and premium, provide advice on the appropriate insurance product, arrange and administer the insurance contract and offer, arrange and administer premium credit facilities for you.

6.1.2 We also carry out certain checks including:

(a) Credit checks;

(b) Anti-money laundering checks and identity verification;

(c) Other sanction checks (e.g. terrorism financing checks).

(d) Fraud checks

We cannot provide you with a quote and/ or arrange insurance cover for one of our insurance products unless we use the information to make checks and evaluate the level of insurance cover that you need. We are also required to use your Personal Data under (b) and (c) in this way by law.

6.2 To administer our service

6.2.1 This includes administering payments and engaging with debt collection agencies for recovery of debt.

We can use your Personal Data in this way because we cannot provide our services to you unless we do.

6.3 To analyse our customer base

6.3.1 This includes to carry out research and analysis, including analysis of our customer base, and other individuals whose personal information we use to analyse behaviour, preferences and interests, develop new products, improve our services, identify usage trends and understand the interests of our users.

We can use your Personal Data in this way because it is in our interests to improve our services.

6.4 To plan and execute business transactions (including joint ventures and business sales)

We can use your Personal Data in this way where we are required to do so pursuant to a contractual obligation to a third party.

6.5 To manage our IT environment and business operation and ensure security of your data and our IT operations

We can use your Personal Data in this way because we cannot provide our services to you unless we do and we have a legal duty to ensure the security of your data.

6.6 To monitor and assess compliance with AB&C insurance policies and procedures and to comply with our legal, regulatory and good governance obligations

We can use your Personal Data in this way because we have a legitimate interest to do so and it will assist us to provide the best service to you.

6.7 For training purposes

We can use your data in this way because we have a legitimate interest to do so and it will assist us to provide the best service to you.

6.8 To interest you in other insurance products and services (marketing)

6.8.1 We may use your information to make decisions about what other products and services you might be interested in and contact you by email, text, telephone, post or other means about these products and services.

We can use your data in this way because it is in our interest in promoting and managing our business to do so. We balance this interest with the impact on you, and at any time you can ask us to stop using your information for this purpose. Please see section 9 of this Fair Processing Notice for information on how to ask us to stop.

Please note, even if you do not proceed with an insurance policy with us, or after your policy comes to an end, we will continue to use your personal data in this way, unless you have asked us not to.

## 7. Sharing Personal Data

7.1 We can share your information including Personal Data and Sensitive Personal Data with the

following parties for the purposes set out above. This is done in line with our Data Protection Policy and Procedures.

### 7.1.1 Insurance Agents and Companies

Third party insurance providers with whom AB&C Insurance has a commercial relationship for the purposes of providing you with a quote and insurance cover. Your information may also be shared with their associated companies, agents and reinsurers.

Insurance agents and companies may at any time, use publicly available and privately held data which may be obtained from a variety of sources, including a credit check from a credit reference agency. Searches will appear on your credit report whether or not your applications proceed.

Details of how your insurer uses your information are included in your policy documentation.

### 7.1.3 Our Service Providers

External third-party service providers in a service provider role, such as accountants, financiers, debt collection agencies, auditors, lawyers and other outside professional advisors; call centre service providers; IT systems and management, IT support and security service providers including cloud-based providers; research and analytics service providers; claim investigators and adjusters; and similar third-party service providers that assist us in carrying out business activities connected with your policy and our administration of your policy.

### 7.1.4 Other Third Parties

To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); to reinsurance companies.

### 7.1.5 As we believe to be necessary or appropriate

To comply with legal process, to respond to requests from public and government authorities including public and government authorities outside your country of residence, to enforce our terms and conditions, to protect our operations, to protect our rights, privacy, safety or property, and/or that of you or others; to detect and prevent crime, including fraud; and to allow us to pursue

available remedies or limit the damages that we may sustain.

#### 7.1.6 Persons acting on your behalf

Your spouse or partner who calls us on your behalf, provided they are named on the policy. If you would like someone else to deal with your policy on your behalf on a regular basis please let us know. In some exceptional cases we may also deal with other people who call on your behalf, but only with your consent. If at any time you would prefer us to deal only with you, please let us know.

#### 7.1.7 Fraud and Credit Agencies

We may share your personal information with these agencies for the purposes of identity verification, detecting fraud and for credit referencing purposes.

These agencies may undertake a search with credit reference agencies to verify identity. The credit reference agency will check the details supplied against any database, public or otherwise. A record of searches will be retained. The credit reference agency may use the details provided to assist other companies for verification and identification purposes.

#### 7.1.8 Motor & Home Insurance Anti-Fraud Registers

Insurers share information with each other via the Claims and Underwriting Exchange Register and the Motor Insurance Anti-Fraud and Theft Register, to aid the detection and prevention of fraudulent claims. In the event of a claim, the information you supply on the claim form, together with any other information relating to the claim, will be put on the Registers.

### 8. Data Processing overseas

8.1 We may share Personal Information with one or more of our service providers or with third parties for the purposes described in this Policy. Some of these affiliated companies, service providers and third parties may be based in other countries and may not be subject to the laws of the UK.

8.2 We will take all steps reasonably necessary in such cases to ensure that your Personal Information is treated securely and in accordance

with this Fair Processing Notice. This includes putting in place agreements with the people we send your information to, to require them to treat your information with similar protections to those that apply in the UK. But it is possible that the agreements would not stop governments in other parts of the world using your information as they may in some cases have power to overrule any agreements we make.

### 9. Contacting Us about this Notice

9.1 Our Data Protection Officer is in charge of dealing with questions you may have about this privacy notice or dealing with your requests to exercise your rights which are described below. Our Data Protection Officer can be contacted [info@abcni.co.uk](mailto:info@abcni.co.uk) or at AB&C Insurance, 67 William Street, Lurgan, Craigavon BT66 6JB

9.2 You can contact us at the address above for one or more of the following reasons:

9.2.1 To ask us to fix information about you that is wrong or incomplete, this is known as a right to rectification.

9.2.2 To ask us to delete information about you, this is known as the right to erasure.

9.2.3 To tell us you no longer agree to us using information about you and ask us to stop, this is known as a right to object.

9.2.4 To tell us to stop using information about you to sell you products and services, which is known as the right to restrict processing. In addition to contacting us using the details above you may change your marketing preferences at any time by contacting us at [info@abcni.co.uk](mailto:info@abcni.co.uk).

9.2.5 To make a "subject access request", which is a request for us to send you the information we have about you.

9.2.6 To ask us to provide you or someone else (on your request) in a structured, commonly used and machine-readable format with the information you have provided to us about yourself. This is known as a "data portability" right.

9.2.7 To ask us not to use information about you in a way that allows computers to make decisions about you based solely on automated processing.

9.3 Sometimes we will not stop using your information when you ask us to, for the reasons

described in this notice, but we will tell you about this if you make a request.

9.4 In other cases, if we stop using your information we will not be able to provide the services that you are asking us to give you. We will tell you about this if you make a request.

## 10. Complaints

10.1 You have the right to complain about how we treat your Personal Data and Sensitive Personal Data to the Information Commissioner's Office (ICO). The ICO can be contacted at:

<https://ico.org.uk/global/contact-us/>

10.2 We are only allowed to keep your information if we need it for one of the reasons we describe above.

10.3 We will keep it for up to 7 years to satisfy industry, regulatory and contractual requirements. Recordings of telephone calls are kept for a period of 3 years.

## 11. Profiling

11.1 We will use your personal data to engage in profiling with the use of our computer system. Our computer will make certain decisions about you which will be based on comparing you with other people.

This is important because:

11.1.1 in providing insurance services it assists us to evaluate your risks in order to provide you with an appropriate insurance product and price;

11.1.2 in detecting criminal activity as it assists us to detect, for example fraud and other criminal activities;

11.1.3 in selling you other products it helps us decide which other products might be useful to you.

## 12. Changes to this Fair Processing Notice

12.1 We may update this Fair Processing Notice from time to time. We will notify you of the changes where we are required by law to do so.

12.2 Last modified February 2018. Previous versions can be requested using the detail in section 9.1 above.