

# HENCILLA CANWORTH LTD - PRIVACY NOTICE

## ABOUT US

Hencilla Canworth Ltd (also referred to as “we”, “us”, or “our”) are a registered company in England (Company no. 01593583). Our registered address is Simpson House, 6 Cherry Orchard Road, Croydon, Surrey, CR9 6AZ. We also use a trading name of First Act Insurance.

## 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 and contact details.

Personal data may contain information which is known as special categories of personal data. This may be information relating to an individual’s health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to 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 provide and administer insurance 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, customer events, promotions and campaigns.

We may also need to collect personal data relating to others in order to provide and administer 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 you contact us via the telephone, when writing to us directly or where we provide you with paper based forms for completion or we complete a form in conjunction with you.

We will share your personal data within our firm 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 quote for, source, place and administer your insurances including arranging insurance premium finance, to perform underwriting activities and to process claims. Some examples follow:

- Insurers;
- Your trade union or association
- Underwriters;
- Premium finance providers;
- Credit reference agencies;
- Debt recovery agencies;
- Claims handling companies;
- Loss adjusters;
- Insurance brokers;
- Reinsurers;
- Regulators.

We will record your communications with us when contacting us, for 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 they may also process your data in which circumstance we will be a joint data controller of your personal data. If you would like information on how they process your personal data you should read the relevant privacy policy available on their website.

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, address, date of birth, gender, contact details and details of historic claims

- Special categories of personal data such as trade union membership, health and details on historic claims resulting in injury (physical and physiological)
- Data relating to criminal convictions and offences such as details of driving offences or insurance fraud

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 Data Privacy Representative. Contact details are [mail@hencilla.co.uk](mailto:mail@hencilla.co.uk)

## **HENCILLA ONLINE**

When dealing with us online we will collect your personal data when you visit our website, 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. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating our website and when using features. For more information please see our Cookie Policy below.

## **COOKIES**

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of our website and enable us to compile reports on our website activity. Google may share the information with other website operators or use this to provide other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser.

However, in a few cases some of our website features may not function as a result. Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## **WHY DO WE NEED YOUR PERSONAL DATA?**

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

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.

We will retain your personal, special category and criminal conviction history data at the end of any contractual agreement indefinitely. Where you have submitted a claim, we will retain your data for a period of 6 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 retaining of data is necessary where required for contractual, legal or regulatory purposes or for our legitimate business interests. The nature and scope of regulatory reviews and our ongoing liability for advice given requires us to keep data indefinitely.

Please contact our Data Privacy Representative if you object to the use of, or you have any questions relating to the use of, your data, or the retention of your personal data. Contact details are [mail@hencilla.co.uk](mailto:mail@hencilla.co.uk)

## **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);
- 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.

## **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 our firm and authorised third parties.

## **CHANGES TO OUR PRIVACY POLICY**

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on April 2018.

## **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: David Pollard- e mail [David.pollard@hencilla.co.uk](mailto:David.pollard@hencilla.co.uk).

## **COMPLAINTS**

If you are dissatisfied with any aspect of the way in which we process your personal data please contact Data Privacy Representative. 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 helpline on 0303 123 1113.

## **HOW TO CONTACT US**

If you have any questions regarding this Notice, the use of your data and your Individual Rights please contact our Data Privacy Representative at Simpson House, 6 Cherry Orchard Road, Croydon, Surrey, CR9 6AZ or by e-mailing [mail@hencilla.co.uk](mailto:mail@hencilla.co.uk) or by telephoning 020 8686 5050.