



# PRIVACY NOTICE

## ABOUT US

We Risk Management & Corporate Insurance Services Limited (RMCI) are a Registered Company in England No: 4127123.

Our Registered address is:

3 – 4 Tannery House  
Tannery Lane  
Send  
Surrey  
GU23 7EF

## 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, and 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 arrange 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 arrange 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. If our site contains links to other websites we are not responsible for the Content or privacy policies of such sites. Please ensure that if you click on any of our links that you read the Privacy and Cookie policy of the site you are visiting as you may be required to pass your personal information to that third party.

**We** will share your personal data within **our** firm, group of companies, business, including affiliates, subsidiaries 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 to perform underwriting activities and to process claims. Some examples follow:

- Insurers;
- Underwriters;
- Credit reference agencies;
- Debt recovery agencies;
- Claims handling companies;
- Loss adjusters;
- Insurance brokers;
- Reinsurers;
- Regulators.
- Other Insurance Market participants
- Anti-fraud databases, sanctions lists, court judgements and other databases

- Public available sources such as Open electoral register and Companies House
- Your family members, Employer or Representatives
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For example we might collect your personal data where;

You have taken out an insurance policy through us (you are the policyholder), in which case we might collect your personal data from you, credit reference agencies, anti-fraud databases and sanctions list etc.

A third party (such as a family member or your Employer) has taken out an insurance policy through us for your benefit (you are the insured or beneficiary) in which case we might collect your data from a family member, Employer etc.

You are a claimant or other person involved in a claim or relevant to a policy. E.g. you are taken out through us for your benefit, or you are making a claims against a third party's insurance policy that was taken out through us, or a third party is making a claim against an insurance policy you have taken out through us, in which case we might collect your personal data from you, other insurance market participants, witnesses, experts,( including medical experts, loss adjusters , solicitors and claims handlers etc

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.

**We** may record your communications with **us** when contacting **our** customer care, complaints and other customer focused functions. **We** also collect personal data through the use of telematics or similar locational tracking services, where you have agreed to the use of this particular service.

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.

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 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' by e-mailing [enquiries@rmci.co.uk](mailto:enquiries@rmci.co.uk)

## Cookies

### What is a cookie?

Cookies are files containing small amounts of information which are downloaded to the device you use when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies do lots of different and useful jobs, such as remembering your preferences, and generally improving your online experience. There are different types of cookies. They all work in the same way, but have minor differences.

### Using cookies

Year Abroad Insurance is committed to protecting you and any data that we collect about you online. This section tells you how we use cookies, why, and how this allows us to improve our service. It also tells you how you can manage what cookies are stored on your device.

By using our website you agree that this Cookie Policy applies to that use in addition to any other terms and conditions which may apply.

We reserve the right to make changes to our Cookie Policy. Any such changes shall become effective immediately. Your continued use of our website is taken as meaning that you agree to any such changes.

### Session cookies

Session cookies last only for the duration of your visit and are deleted when you close your browser. These facilitate various tasks such as allowing a website to identify that a user of a particular device is navigating from page to page, supporting website security or basic functionality. The only session cookie we currently use on our Site is: ASP.NET\_SessionID which is a first party cookie.

## Functionality cookies

Persistent cookies last after you have closed your browser, and allow a website to remember your actions and preferences. We do not use persistent cookies.

## First and third party cookies

Whether a cookie is a first or third party cookie depends on which website the cookie comes from. First party cookies are those set by or on behalf of the website visited. All other cookies are third party cookies. The only first party and third party cookies we currently use on our Site are:

\_\_utma - Google Analytics, third party  
\_\_utmb - Google Analytics, third party  
\_\_utmc - Google Analytics, first party  
\_\_utmz - Google Analytics, third party

## Strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features and security. Without these cookies services you have asked for, such as applying for the product cannot be provided. Examples of these type of cookies used by Year Abroad Insurance are navigation and content management systems.

## Performance cookies

These cookies collect information about how visitors use our web site, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor although they may collect the IP address of the device used to access the site. All information these cookies collect is anonymous and is used to improve how a website works, the user experience and to optimise our advertising. By using our websites you agree that we can place these types of cookies on your device, however you can block these cookies using your browser settings. See "First and third party cookies" above for details of performance cookies currently used on the site.

## Additional information

From time to time, we may embed external content from third party websites within our website. Additionally, we partner with third parties who provide services for us which you can navigate to from our website. These third parties may use cookies, you can find out about their approach to cookies on their websites. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

## What if I don't want to accept cookies?

If you wish to restrict or block the cookies which are set by any website you should do this through the browser settings for each browser you use, on each device you use to access the internet.

Please be aware that some of our services will not function if your browser does not accept cookies. However, you can allow cookies from specific websites by making them "trusted websites" in your internet browser.

Alternatively, you may wish to visit [allaboutcookies.org](http://allaboutcookies.org) which contains information on how to do this on a wide variety of browsers.

## 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 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 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.

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 data privacy representative**.

**We** will retain your personal data at the end of any contractual agreement for a period of *6 years*]. We will retain special category and criminal conviction data for a period of 6 years. Where you have submitted a claim, we will retain your data for a period of 6 years, if it is a non-injury claim; where an individual has been injured (physical and physiological), we will retain your data for *12 years*. Where you have requested a quote, **we** will retain your personal data for *2 years*, where you have contacted **us** for details of **our** services and products, **we** will retain your personal data for *2 years*. Where you make a complaint we will retain the data for *3 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 for statistical analysis (profiling) 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.

You should be aware that **we** use automated decision making (services/tools and techniques) to check for customer suitability to **our** products, for example **we** might perform a credit search to check an individual's solvency and credit rating. **We** also analyse data to identify products and services that 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 techniques).]

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, the retention of your personal data or the use of profiling and automated decision making services/tools and techniques. You can opt out of receiving marketing services by e-mailing enquiries@rmci.co.uk

## INTERNATIONAL TRANSFERS OF PERSONAL DATA

**We** will transfer your data to third parties based outside the European Economic Area. This is necessary for the purposes of administering out 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** data privacy representative 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);
- 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** Data Protection Officer by e-mailing [enquiries@rmci.co.uk](mailto:enquiries@rmci.co.uk) or by writing to 3 – 4 Tannery House, Tannery Lane, Send, Surrey, GU23 7EF

## 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, group of companies, business, including affiliates, subsidiaries 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:

In writing                      Data Privacy Representative  
   RMCI  
   3/4 Tannery House  
   Tannery Lane  
   Send  
   Surrey  
   GU23 7EF

By phone:                      Telephone: 01483479474

By E-Mail:                      [r.manners@rmci.co.uk](mailto:r.manners@rmci.co.uk)

## COMPLAINTS

If you are dissatisfied with any aspect of the way in which we process your personal data please contact our 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/>, 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:

In writing            Data Privacy Representative  
                             RMCI  
                             3/4 Tannery House  
                             Tannery Lane  
                             Send  
                             Surrey  
                             GU23 7EF

By phone:            Telephone: 01483479474

By E-Mail:           [r.manners@rmci.co.uk](mailto:r.manners@rmci.co.uk)