



# PRIVACY POLICY

Qdos Broker and Underwriting Services Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## 1 IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Qdos Broker and Underwriting Services Limited collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase and/or use a product or service.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### CONTROLLER

Qdos Broker and Underwriting Services Limited is the controller and responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this privacy notice). Its registered office is Unit D, Troon Way Business Centre, Thurmaston, Leicestershire LE4 9HA and its registered number is 06012716. The Company owns the information collected on the website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### CONTACT DETAILS

Name or title of data privacy manager: Jessica Martin

Email address: [jmartin@qdoscontractor.com](mailto:jmartin@qdoscontractor.com)

Postal address: Qdos Broker and Underwriting Services Limited, Unit D, Troon Way Business Centre, Thurmaston, Leicestershire LE4 9HA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on in July 2018. This privacy policy may change from time to time so please check it periodically.

The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) until May 2018 as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, correspondence address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Previous and current claims** information about previous and current claims
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data and Previous and current claims by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - (1) apply for our products or services;
  - (2) create an account on our website;
  - (3) subscribe to our service or publications;
  - (4) request marketing to be sent to you;
  - (5) enter a competition, promotion or survey; or
  - (6) give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy (<https://www.qdoscontractor.com/cookie-policy>) for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - (1) Technical Data from analytics providers such as Google based outside the EU.
  - (2) Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Sage Pay based inside the EU.
  - (3) Identity and Contact Data from publicly available sources such as Companies House based inside the EU.
  - (4) Identity and Contact Data and Previous and current claims from recruitment agencies and/or other related parties, to include engagers, lawyers and claim handlers.

### 4 HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Please refer to the [Glossary](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
<b>Quotation</b>		
To register you as a new customer	(a) Identity (b) Contact (c) Previous and current claims	Performance of a contract with you
Evaluating the risks to be covered and matching to appropriate policy and premium	(a) Identity (b) Contact (c) Previous and current claims (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to determine the likely risk profile and appropriate insurance product)
<b>Customer Administration</b>		
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) General client care, including communicating with customers	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Usage	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services and to correspond with customers in order to facilitate the placing of orders and claims under insurance policies)
<b>Claims Processing</b>		
Managing insurance claims, which will include defending or prosecuting claims	(a) Identity (b) Contact (c) Profile (d) Transaction (e) Previous and current claims	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to assist our customers in assessing and making claims)
<b>Renewals</b>		
Contacting customers in order to arrange the renewal of the insurance policy	(a) Identity (b) Contact (c) Profile (d) Transaction (e) Previous and current claims	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to correspond with customers to facilitate the continuation of insurance cover)
<b>Consultancy Services</b>		
To provide consultancy services, to include providing advice, general client care and evaluation of risk	(a) Identity (b) Contact (c) Profile (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to correspond with customers in order to assess the risks and provide the agreed consultancy services)

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## Website and marketing activities

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To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

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## Legal and Regulatory

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Complying with our legal or regulatory obligations	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile (f) Usage (g) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to take pre-emptive steps to ensure legal and regulatory compliance)
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## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

### THIRD-PARTY MARKETING

We will obtain your express opt-in consent before we share your personal data with any company outside our corporate group for marketing purposes.

## **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions. As your insurance broker we have a duty to act in your best interests. Where you opt out of receiving marketing messages, we will continue to communicate with you via telephone, email and post where we need to:

- collect information that we may require from you in order to provide our products/services;
- notify you in advance of policy renewals;
- inform you of any changes to our products and services;
- make you aware of any potential gaps in your insurance coverage, and to recommend products/services to help address those gaps.

## **COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see (<https://www.qdoscontractor.com/cookie-policy>).

## **CUSTOMER REVIEWS / FEEDBACK**

Where relevant and necessary for the purpose of the processing activity, we may disclose your personal data to other appropriate organisations who have a need to know (so-called 'third party recipients'), based on our legitimate interest.

With the purpose of helping us understand more about your experience using our services, we may for example share your personal data with Feefo Holdings Ltd, an independent market research company, who will enable you to provide us with feedback and reviews of our products and services.

Feefo shall only be permitted to contact you once in relation to each order you place with us, for the sole purpose of inviting you to submit a review of your experience of our services. Your details will not be used by Feefo for any other purpose. Further information regarding Feefo can be found at [https://www.feefo.com/business/gb\\_en/about/b2c-customers](https://www.feefo.com/business/gb_en/about/b2c-customers).

When we share your personal data externally as described above, it will be subject to strict data processing agreements whereby Qdos remains the data controller and the third party acts as data processor. The access and transfer of your personal data shall be restricted to trusted third party recipients who demonstrate an adequate level of data protection. Moreover, these third-party recipients will be required to delete or return all the personal data to Qdos after the end of the provision of services relating to the processing and delete existing copies, unless the law requires storage of the personal data.

You may object at any time to the processing of your personal data by Qdos or any third-party recipient for this purpose, where such processing is carried out based on our legitimate interests.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5 DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6 INTERNATIONAL TRANSFERS

Data collected via our website is shared with our cloud-based customer relationship management software provider, which utilises servers in the United States of America. Our contract with the software provider ensures that data remains strictly confidential, is only processed in accordance with our instructions, and at all times is subject to the EU-US Privacy Shield, which protects the fundamental rights of EU data subjects whenever their data is transferred outside the EEA.

## 7 DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8 DATA RETENTION

### HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

Our retention periods for personal data are based on business needs and legal requirements. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, and any other permissible related purpose.

For example, we retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When personal data is no longer needed, we either irreversibly anonymise the data (in which case we may further retain and use the anonymised information) or securely destroy the data.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

## 9 YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data](#)
- [Request correction of your personal data](#)

- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact us.

### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10 GLOSSARY**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **External Third Parties**

- Service providers acting as processors in the United Kingdom and the United States of America who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Parties you are contracted with, directly or indirectly, which will include (but not be limited to) those who will be in receipt of the assessment we carry out on your IR35/tax status.



## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.