



HANSARD  
INTERNATIONAL



# Privacy Policy

Hansard International Limited

## Privacy Policy

This Privacy Policy sets out details of the personal information that we may collect from you and how we may use that information.

Please read this Privacy Policy carefully. The headings of this Privacy Policy are as follows:

1. Who we are and how to contact us or our Data Protection Officer
2. What personal information do we collect and why do we collect it?
3. From whom we obtain your personal information and with whom we share it
4. The purposes for which your personal information is used
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## 1. Who we are and how to contact us or our Data Protection Officer

In this Privacy Policy references to “we” or “us” or “Hansard” are references to Hansard International Limited, Harbour Court, Lord Street, Box 192, Douglas, Isle of Man, IM99 1QL, British Isles. “Hansard Group” means the group of companies under ownership of, or common ultimate ownership with, Hansard International Limited.

You can contact us at this postal address or at the following email address [data.protection@hansard.com](mailto:data.protection@hansard.com) or by telephone on the following number +44 1624 688000.

We are the data controller of any personal information you provide to us. This means that we are responsible for complying with relevant data protection laws. The data protection supervisory authority in the Isle of Man is the Isle of Man Information Commissioner – the website of which is: [www.inforights.im](http://www.inforights.im).

We have appointed a Data Protection Officer to oversee our handling of personal information. If you have any questions about how we collect, store or use your information, you may contact our Data Protection Officer at the address above. If you have any complaints regarding our use of your personal information, you can contact our Data Protection Officer at the address above or the Isle of Man Information Commissioner at the website address above.

## 2. What personal information do we collect and why do we collect it?

This Privacy Policy describes what personal information we may collect from you, about you and describes how and why we use your personal information.

Personal data consists of any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. For example, your name, date of birth, nationality and address would be considered personal data. We collect information about you, initially when you request a quote for any of our products or services, either directly or through third parties. Should you decide to purchase one of our products we will need to collect additional personal information, such as your bank account details, beneficiary details, etc. The collection of personal information is necessary for the administration of your contract with us or to otherwise perform the services you have requested from us. In addition, we may require information from you and from third parties about you to allow us to comply with legislation and regulations that apply to us – an example of this may be for anti-money laundering purposes.

Sometimes we will ask for or obtain “special category personal data” because it is relevant to your contract or claim (for example, ethnicity and health information from you and/or your doctor).

If you provide personal information to us about other people (e.g. beneficiaries under your contract with us) you must provide them with a copy of this Privacy Policy and obtain their consent as required for the processing of that person’s information in accordance with this Privacy Policy.

### Personal information

To allow us to provide services, we will require the following personal information about the proposed contract holder and in some cases other related persons:

- (a) name, date of birth, address and telephone number;
- (b) gender;
- (c) relationship to the contract holder;
- (d) identification information such as national insurance number, passport number or driving licence number;
- (e) job title or other information about that person’s job;
- (f) information relating to the advice that is requested or the services that we are providing;
- (g) information relating to previous insurance contracts and claims in order to advise on future needs;
- (h) financial information such as financial history and needs, income, bank details, payment details and information obtained as a result of our credit checks;
- (i) we may carry out credit and regulatory checks and these may be carried out by third parties on our behalf;
- (j) information obtained through our use of cookies. Please see below for more information;
- (k) information on relevant family members and beneficiaries of the contract;
- (l) information captured during telephone calls;
- (m) marketing preferences.

### Special categories of personal data

- details of current or former physical or mental health;
- information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction);
- details of race and/or ethnicity, political opinions, religious or philosophical beliefs or trade union membership;
- data concerning sex life and/or sexual orientation.

### 3. From whom we obtain your personal information and with whom we share it

We collect personal information from a number of different sources including:

- directly from you or from someone else on your behalf;
- from other third parties involved in the contract or claim, such as an independent financial advisor;
- from other third parties who provide a service in relation to the contract or claim such as loss adjusters, claims handlers, experts, healthcare providers and other service providers;
- via publicly available sources, such as internet search engines and social media sites;
- from other companies within the Hansard Group;
- through customer satisfaction surveys and market research;
- from fraud prevention databases and sanctions screening;

We may share your personal information with other members of the Hansard Group or with third parties for the following administrative purposes;

- providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;
- to facilitate the service that we and your independent financial advisor give to you;
- responding to your enquiries and complaints;
- administering offers, competitions, and promotions;
- undertaking financial reviews;
- facilitating secure access to online platforms; and
- IT and hosting services.

If you would like further information regarding disclosure of your personal information, please see section 1 for our contact details.

In order to provide our services your personal information is shared with other companies in the Hansard Group. Your personal information might be shared for our general business administration purposes or for the prevention and detection of fraud.

We also disclose your information to the third parties listed below for the purposes described in this Privacy Policy. This might include:

- our partners such as intermediaries, fund advisors, insurers, reinsurers or other companies who act as distributors;
- other third parties who assist in the administration of contracts such as loss adjusters, claims handlers, accountants, auditors, lawyers and other experts;
- fraud detection agencies and other third parties who operate and maintain fraud detection registers;
- investigative firms we ask to look into claims on our behalf in relation to suspected fraud;
- our regulators;
- the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime;
- other insurers who provide our own insurance;
- industry bodies;
- debt collection agencies;
- credit reference agencies;
- credit card scheme providers (e.g. Visa or MasterCard);
- our third-party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and tax advisers;
- your doctor and other medical professionals;
- selected third parties in connection with the re-organisation, sale, transfer or disposal of our business.

We will share your personal information with your independent financial advisor to allow us to administer our contract with you. If you change your independent financial advisor you must advise us of this immediately.

#### 4. The purposes for which your personal information is used

We will rely on the following legal grounds to process personal information about you:

- the processing is necessary to perform our contract with you (for example, where you are the contract holder);
- 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 have a legal or regulatory obligation to use such personal information, and it is necessary to process your personal information to comply with such;
- where the use is necessary to establish, exercise or defend our legal rights;
- where you have provided your explicit consent to our use of your personal information.

You will find further details of our legal grounds for each of our processing purposes below:

##### **(a) To set you up as a client including carrying out fraud, credit and anti-money laundering checks and to administer the contract we have with you**

In these instances our processing of your personal information is:

- necessary to perform a contract with you;
- necessary for us to comply with law and our regulatory obligations;
- 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.

##### **Additional legal ground for special categories of personal data**

- You have provided your explicit consent;
- In accordance with conditions set out in data protection legislation which are specific to the insurance sector.

##### **(b) Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice)**

- 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.

##### **(c) Provide marketing information to you in accordance with your marketing preferences**

- 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.

##### **(d) Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by us and other members of the Hansard Group**

- 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;
- Tracing and recovering debt.

##### **(e) Monitoring usage of any of the various Hansard websites**

- 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.

##### **(f) Transfers outside of the Isle of Man and European Economic Area**

- Where it is necessary for the performance of the contract between us as it involves the transfer of your personal information to your independent financial advisor. We may also send your personal information to third party aggregators that may be outside the Isle of Man and European Economic Area - for further details see paragraph 4(g) below and also paragraph 12 below.

##### **(g) Transfers to third party aggregators**

- 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. For further details on transfers to third-party aggregators, please see paragraph 12 below.

## 5. Change of purpose

We will only use your personal information for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information 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 information without your knowledge or consent, where this is required or permitted by law.

## 6. Sending information overseas

We (or third parties acting on our behalf) may store or process information that we collect about you in countries outside the Isle of Man and European Economic Area. Where we make a transfer of your personal information outside of the Isle of Man and European Economic Area we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards. If you would like further information regarding the steps we take to safeguard your personal information, in this regard, please contact us using the details set out in section 1.

## 7. What marketing activities do we carry out?

We may, in accordance with your marketing preferences, from time to time provide you with information about our products or services or those of our partners or those of the Hansard Group.

An “unsubscribe” link appears in all our marketing emails. To unsubscribe from marketing emails sent by us, simply click on the link at any time.

## 8. Cookies

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. **Our cookies policy is available for you to read on our website [hansard.com](https://www.hansard.com)**

## 9. Telephone calls

We may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

## 10. How long do we keep personal information for?

We will only store your personal information for as long as reasonably necessary to fulfil the purposes set out in this notice and to comply with our regulatory and/or legal obligations. Our maximum retention period is six years from the end of our relationship with you. For further information regarding how long your personal information will be kept, please see our contact details in see section 1.

## 11. Your duty to inform us of changes

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

## 12. Third-party aggregators

We, like many businesses in the insurance sector, use third-party aggregators to aggregate data to assist in the administration of your contract and to facilitate the provision of the service we and your independent financial advisor give to you. Some of these aggregators may be outside the Isle of Man and European Economic Area. In the event that we send data to these aggregators, we will put in place contractual obligations to protect your personal information to adequate standards and will not send your name or address to the aggregators.

### 13. Your rights

Under data protection law you have the right to make certain requests in relation to the personal information that we hold about you. We will not usually make a charge for dealing with these requests. If you wish to exercise these rights at any time please contact us using the details set out in section 1.

There may be cases where we may not be able to comply with your request (such as where this would conflict with our obligation to comply with other regulatory and/ or legal requirements). However, if we cannot comply with your request, we will tell you the reason provided we are allowed to do so by law, and we will always respond to any request you make.

There may also be circumstances, depending on the right and the point in time, during your contract term when you contact us, where exercising some of these rights (such as the right to erasure, the right to restriction of processing and the right to withdraw consent), where you may lose certain contract benefits. However, once you contact us to exercise any of the rights below, we will explain any applicable consequences to your individual contract at that time so that you are able to have the best information possible to make informed choices.

Your rights include:

- **The right to access your personal information**

You are entitled to a copy of the personal information we hold about you and certain details of how we use it.

We will usually provide you with your information in writing, unless you request otherwise, or where you have made the request using electronic means, in which case the information will, where possible, be provided to you by electronic means.

- **The right to rectification**

We take reasonable steps to ensure that information we hold about you is accurate and complete. However, you can ask us to amend or update it if you do not believe this is the case.

- **The right to erasure**

You have the right to ask us to erase your personal information in certain circumstances, for example where you withdraw your consent or where the personal information we collected is no longer necessary for the original purpose. This will need to be balanced against other factors however. For example, we may have regulatory and/or legal obligations which mean we cannot comply with your request.

- **The right to restriction of processing**

In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that we no longer need to use your personal information or where you think that the personal information we hold about you may be inaccurate.

- **The right to data portability**

You have the right, under certain circumstances, to ask that we transfer personal information you have provided to us, to another third party of your choice.

- **The right to withdraw consent**

We will ask for your consent for certain uses of your personal information. Where we do this, you have the right to withdraw your consent to further use of your personal information.

Please note that for some purposes, we need your consent in order to provide a contract. If you withdraw your consent, we may need to cancel the relevant contract or be unable to pay a claim. We will advise you of this at the point you seek to withdraw your consent.

- **The right to make a complaint to the Isle of Man Information Commissioner**

You have a right to complain to the Information Commissioner's Office if you believe that any use of your personal information by us is in breach of applicable data protection laws and/or regulations. More information can be found on the Isle of Man Information Commissioner's Office website: [www.inforights.im](http://www.inforights.im)

This will not affect any other legal rights or remedies that you have.

#### **14. How we protect your personal information**

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

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

To protect your information we use a range of organisational and technical security measures.

Where we have given you (or you have chosen) a password, you are responsible for keeping this password confidential. Please do not share your password with anyone.

Within the Hansard Group, we restrict access to your information as appropriate, to those who need to know that information for the purposes set out above.

We use firewalls to block unauthorised traffic to the servers and the actual servers are located in a secure location which can only be accessed by authorised personnel. Our internal procedures cover the storage, access and disclosure of your information.

#### **15. 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 the information (or to exercise any of your other rights). This is to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **16. Updates to this Privacy Policy**

We reserve the right to make changes to this Privacy Policy, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website from time to time to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on: 08/05/2018.

#### **Hansard International Limited**

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Regulated by the Isle of Man Financial Services Authority