Grafton Insurance Risk Solutions Privacy and Confidentiality Policy

Data Protection

- 1. We will collect and store your personal and financial information which will be handled in accordance with the Data Protection Act 1998 as amended, extended, reenacted or consolidated from time to time (including without limitation the implementation of the General Data Protection Regulation 2016/679/EC) (data protection legislation). For the purposes of data protection legislation, we are the data controller and we will process your Data in accordance with articles 6 (1)(b), 6 (1)(c) and 9 (2)(a) of the General Data Protection Regulation 2016. We will use your information to ensure proper performance of our agreement with you and to comply with our legal obligations when providing the services as further described below.
- 2. We will use your name, address, email address, contact number, date of birth, and financial information ('personal information') to provide our services to you and verify your identity and this may require us to pass your personal information to our group companies, electronic verification providers, product providers or other financial firms such as lenders, banks, insurers, fund managers and platform providers. Should you decide not to proceed with our services, we will delete your personal information.
- 3. We may be required to pass on your personal information to the Financial Conduct Authority (FCA), Financial Ombudsman Service (FOS) or the Financial Services Compensation Scheme (FSCS) to help with an investigation or complaint or other authorities as required by law.
- 4. We may need to collect sensitive personal data including information about your health, ethnic origin, or criminal prosecutions from third parties such as employers and credit reference agencies, fraud prevention agencies and other similar organisations, in order to provide you with our services.

You may exercise your right to withdraw your consent to the processing of your sensitive personal data at any time by contacting Mark Grafton Trading as Grafton Insurance Risk Solutions

You may exercise your right to withdraw your consent and opt-out of receiving any marketing information from us at any time. To opt-out of receiving such information by contacting Mark Grafton Trading as Grafton Insurance Risk Solutions providing us with your name and contact details.

- 5. For further information on how your personal information is used, including your rights to access the personal information, please contact Mark Grafton Trading as Grafton Insurance Risk Solutions.
- 6. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

- 6.1 In accordance with data protection legislation we are required to notify you of the legal basis upon which we process your personal data. We process your personal data for the following reasons:
 - 6.1.1 for performance of a contract we enter into with you;
 - 6.1.2 where necessary for compliance with a legal obligation we are subject to; and
 - 6.1.3 for our legitimate interests (as described within this policy).
- 6.2 We will also process your personal data including personal sensitive data where we have obtained your explicit consent.

To help make sure you receive a competitive quotation, offer of appropriate payment options, protection against fraud and to verify your identity, both ourselves and insurers may use publicly available data which we/they obtain from a variety of sources, including a credit reference agency and other external organisations. This search will appear on your credit report, whether or not your application proceeds.

All information on our records relating to you will be treated as private and confidential and will only be disclosed to others such as our business partners, insurers, credit providers and other third parties who are directly involved in the normal course of arranging and administering your insurance. By accessing our sites and using our services, you consent to any such transfer of information to a third party.

Where you have given, us consent, we may use the data we hold about you to provide you with a renewal quotation and information about products and services we consider may be appropriate.

Our Retention of your Personal Information - By using our services you consent to us and our partners retaining any personal information you have provided. We will retain any personal information only for as long as is necessary to fulfil the business purpose for which it was collected. We will also retain and use your personal information for as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Under the General Data Protection Regulations 2018, you have the right to ask us for a copy of any personal information about yourself that we hold on our records. Please contact us if you require any more information. For further information on your rights under the General Data Protection Regulations please refer to the Information Commissioners Office — www.ico.org.uk.