

1 June 2018
PRIVACY POLICY

We are committed to ensuring your privacy is protected. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this Privacy Policy carefully. When using our website, this Privacy Policy should be read alongside the website terms and conditions.

1. About us ►
2. About the insurance market ►
3. Our processing of your personal information ►
1. Prospective customers or parties covered under an insurance policy ►
1. What personal information will we collect?
2. What special categories of information will we collect?
3. How will we collect your personal information?
4. What will we use your personal information for?
5. Who will we share your personal information with?
2. Customers or parties covered under an insurance policy we place ►
1. What personal information will we collect?
2. What special categories of information will we collect?
3. How will we collect your personal information?
4. What will we use your personal information for?
5. Who will we share your personal information with?
3. Third party claimant ►
1. What personal information will we collect?
2. What special categories of information will we collect?
3. How will we collect your personal information?
4. What will we use your personal information for?
5. Who will we share your personal information with?
4. Experts instructed in relation to claims ►
1. What personal information will we collect?
2. How will we collect your personal information?
3. What will we use your personal information for?
4. Who will we share your personal information with?
5. Witnesses to an accident ►
1. What personal information will we collect?
2. What special categories of information will we collect?
3. How will we collect your personal information?

4.	What will we use your personal information for?
5.	Who will we share your personal information with?
6.	Brokers, insurers and reinsurers ►
1.	What personal information will we collect?
2.	What special categories of information will we collect?
3.	How will we collect your personal information?
4.	What will we use your personal information for?
5.	Who will we share your personal information with?
7.	Users of our various Rossborough websites ►
1.	What personal information will we collect?
2.	How will we collect your personal information?
3.	What will we use your personal information for?
4.	Who will we share your personal information with?
4.	How do we protect your personal information when sending it abroad? ►
5.	What marketing activities do we carry out? ►
6.	How long do we keep personal information for? ►
7.	Automated processing ►
8.	Your rights ►
9.	How we protect your information ►
10.	Contacting us ►
11.	Updates to this Privacy Policy ►

1. About us ►

This Privacy Policy describes how R A Rossborough (Guernsey) Limited, Rossborough HealthCare International Limited and their affiliates and subsidiaries "**we**" or "**us**" or "**Rossborough**" collect and process data about individuals. We are insurance intermediaries and part of the Gallagher global group of companies.

In order to provide our services, we will collect and use data about individuals. This means that we are a 'data controller' and we are responsible for complying with data protection laws.

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 personal information, you may contact our Data Protection Officer using the details set out in the "Contacting Us" section.

2. About the insurance market ►

The personal information that we collect and process will be shared with other participants in the insurance market, some of which you will not have direct contact with. You can identify relevant data controllers through the insurance market life-cycle in the following ways:

- **Where you took out the insurance policy yourself**: intermediaries such as Rossborough will be the initial data controller. The insurer will also be a data controller. Rossborough's Data Protection Officer can advise you of the identities of other insurance market participants that have been provided with your personal data.
- **Where your employer or another organisation took out the policy for your benefit**: you should contact your employer or the organisation that took out the policy who should provide you with details of intermediaries such as Rossborough that they provided your personal data to. Rossborough's Data Protection Officer can advise you of the identities of other insurance market participants that have been provided with your personal data.
- **Where you are not a policyholder or an insured**: you should contact the organisation that collected your personal data who should provide you with details of the relevant data protection contact.

3. Our processing of your personal information ►

The personal information that we collect will depend on our relationship with you. Please click on the section below that best describes your relationship with us. For example, we will collect more detailed information about you if you are a customer than we would if you simply made an enquiry about the services that we offer.

Sometimes we will ask for or obtain special categories of information (information relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership) because it is relevant to your insurance policy or claim (for example, health information which relates to an accident policy) or information regarding criminal convictions for the purposes of preventing, detecting and investigating fraud.

If you provide personal information to us about other people you must provide them with a copy of this Privacy Policy and obtain any consent where we indicate that it is required for the processing of that person's information in accordance with this Privacy Policy.

Prospective customers or parties covered under an insurance policy we will be placing ►

This section will detail what personal information we collect about you and use if you are a prospective customer and have submitted your personal information so that we can provide you with a quote for the placing of an insurance policy or if you are a party and would be covered under an insurance policy we will be placing.

What personal information will we collect? ►

- General information such as your name, date of birth, gender, relationship to the customer (where are you not the prospective policyholder), identification information such as social security number, passport number or driving licence number
- Contact details including address, telephone number and email address
- Information about your job including job title, business description, education, employment history and professional certifications
- Information relating to the advice that you request or the services that we are providing. For example, we might need information relating to your previous insurance policies and claims history in order to advise on your future needs
- Financial information such as your financial history and needs, income, bank details, payment details and information obtained as a result of our credit checks
- Information obtained when we carry out checks of sanction lists
- Information obtained through our use of cookies. Please see our cookies policy for more information
- Information captured during recordings of our telephone calls
- Your marketing preferences

What special categories of information will we collect? ►

- Details of your current or former physical or mental health – for example details about a medical claim you made under a previous travel policy when you provide details of your claims history or details about your current health because it is relevant to the insurance policy you want Rossborough to place
- Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information as a result of carrying out checks of sanctions lists
- Information relating to any professional disciplinary action that you are or have been the subject of

How will we collect your personal information? ►

- We will obtain your personal information directly from you or from someone else on your behalf in a number of ways including where it is submitted in application forms, initial disclosure documents and more generally during any forms of communication such as email and telephone
- From other third parties who might introduce customers to us such as another broker and insurers
- Via publically available sources such as internet search engines and social media sites
- From other companies within the Rossborough or Gallagher group
- Through customer satisfaction surveys and market research
- From credit reference agencies
- Via insurance industry fraud prevention and detection databases and sanctions screening tools
- From government agencies and professional regulators

What will we use your personal information for? ►

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We need to use your personal information to enter into or perform our contract with you, for example, in order to fulfil our obligations under our contract and place appropriate insurance cover, we need to use your personal information to provide you with a quote and determine market placement.
- We have a genuine business need to use your personal information such as maintaining our business records and keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- You have provided consent. There may be some circumstances that without your consent to use your special categories of information we would be unable to arrange your insurance cover. We will notify you when this will be applicable and why your consent is necessary.
- Where the use of your special categories of information is necessary to establish, exercise or defend our legal rights, for example legal proceedings are being brought against us or we want to bring a legal claim ourselves.

Please click below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your special categories of information ►
To evaluate your insurance needs and risk appetite and obtain quotes for you	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to determine market placement and place insurance cover for you that is in line with your insurance needs) 	<ul style="list-style-type: none"> • You have provided your consent. We may need your consent for this activity in order to provide you with our services
To set you up as a customer including carrying out fraud, credit and anti-money laundering checks	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to carry out appropriate credit checks and fraud checks) • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary in order for us to comply with an enactment. We may need your consent for this activity in order to provide you with our services • It is necessary to establish, exercise or defend our legal rights
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to respond to our prospective customers and keep them updated on any future placing of insurance cover) 	<ul style="list-style-type: none"> • You have provided your consent. We may need your consent for this activity in order to provide you with our services • It is necessary to establish, exercise or defend our legal rights
Complying with our legal or regulatory obligations (such as our requirements to report to the GFSC)	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend our legal rights • You have provided your consent. We may need your consent for this activity in order to provide you with our services

<p>Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)</p>	<ul style="list-style-type: none"> • We have a genuine business need (to continually improve our services) 	<ul style="list-style-type: none"> • You have provided consent.
<p>Managing our business operations such as maintaining accounting records, analysing financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)</p>	<ul style="list-style-type: none"> • We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business) 	
<p>Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by Rossborough</p>	<ul style="list-style-type: none"> • We have a genuine business need (to market our services) 	
<p>Who will we share your personal information with? ►</p>		

From time to time, we may share your personal information with companies in the Rossborough or Gallagher group or with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- other third parties who assist in the administration of insurance policies such as accountants, auditors, lawyers and other experts
- fraud detection agencies and other third parties who operate and maintain fraud detection registers
- 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
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

Customers or parties covered under an insurance policy we place ►

This section will detail what personal information we collect about you and use if you are a customer or an individual covered by an insurance policy we have placed.

What personal information will we collect? ►

- General information such as your name, date of birth, gender, relationship to the customer (where you are not the policyholder), identification information such as social security number, passport number or driving licence number
- Contact details including address, telephone number and email address
- Information about your job including job title, business description, education, employment history and professional certifications
- Information relating to the advice that you request or the services that we are providing. For example, we might need information relating to your previous insurance policies and claims history
- Information which is relevant to the insurance policy we have placed or any claims made under it. For example where we have placed property insurance for you, we will hold information about your property and the individuals living there
- Information obtained from requests for mid-term adjustments which may reveal changes in your personal circumstances which are relevant to the insurance policy we placed
- Financial information such as your financial history and needs, income, bank details, payment details and information obtained as a result of our credit checks
- Financial information obtained if you request cancellation of your insurance policy and any information relating to the cancellation
- Information obtained when we carry out checks of sanction lists
- Information obtained through our use of cookies. Please see our cookies policy for more information
- Information captured during recordings of our telephone calls
- Your marketing preferences

What special categories of information will we collect? ►

- Details of your current or former physical or mental health – for example where we have placed workers compensation insurance for you, we may have details about your employees' accidents and injuries
- Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information as a result of carrying out checks of sanctions lists
- Information relating to any professional disciplinary action that you are or have been the subject of
- Any other special categories of information you offer up when communicating with us. We will only process such information to the extent that you have provided your consent or where in connection with legal proceedings.

How will we collect your personal information? ►

- We will obtain your personal information directly from you or from someone else on your behalf in a number of ways including where it is submitted in application forms, initial disclosure documents, proposal forms, renewal terms, requests for mid-term adjustments, when you require assistance in making a claim, and more generally during any forms of communication such as email and telephone.
- From other third parties who might introduce customers to us such as another broker and insurers
- From other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- From other third parties involved in the relevant insurance policy or claim such as claimants, witnesses to an incident, loss adjusters, claims handlers and medical experts
- Via publically available sources such as internet search engines and social media sites
- From other companies within the Rossborough or Gallagher group
- Through customer satisfaction surveys and market research
- From credit reference agencies
- Via insurance industry fraud prevention and detection databases and sanctions screening tools
- From government departments and professional regulators

What will we use your personal information for? ►

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We need to use your personal information to enter into or perform our contract with you. For example, in order to fulfil our obligations under our contract and place appropriate insurance cover, we need to use your personal information to provide you with appropriate insurance cover according to your needs.
- We have a genuine business need to use your personal information such as maintaining our business records and keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

-
- You have provided your consent. There may be some circumstances that without your consent to use your special categories of information we would be unable to arrange your insurance cover. We will notify you when this will be applicable and why your consent is necessary
- Where the use of your special categories of information is necessary to establish, exercise or defend our legal rights, for example legal proceedings have been brought against us or we want to bring a legal claim ourselves.

Please click below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your special categories of information ►
To evaluate your insurance needs and risk appetite and obtain quotes for you	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to determine market placement and place insurance cover for you that is in line with your insurance needs) 	<ul style="list-style-type: none"> • You have provided your consent. • We may need your consent for this activity in order to provide you with our services
To arrange appropriate insurance cover and provide policy documentation	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine need (to ensure that you have the appropriate policy documentation) 	<ul style="list-style-type: none"> • You have provided your consent. • We may need your consent for this activity in order to provide you with our services
To assist in any claims made under an insurance policy we have placed	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to assist customers in any claims they have) 	<ul style="list-style-type: none"> • You have provided your consent. • We may need your consent for this activity in order to provide you with our services
To assist with any renewals, mid-term adjustments of your insurance policy or cancellations	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to provide you with appropriate broking services where you request a renewal, mid-term adjustment or cancellation of the insurance policy we have placed) 	<ul style="list-style-type: none"> • You have provided your consent. • We may need your consent for this activity in order to provide you with our services

<p>To set you up as a customer including carrying out fraud, credit and anti-money laundering checks</p>	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to carry out appropriate credit checks and fraud checks) • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary in order for us to comply with an enactment • You have provided your consent. • We may need your consent for this activity in order to provide you with our services. • It is necessary to establish, exercise or defend our legal rights.
<p>Communicating with you and responding to any enquiries you have</p>	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to generally respond to our customers) 	<ul style="list-style-type: none"> • You have provided your consent. • We may need your consent for this activity in order to provide you with our services • It is necessary to establish, exercise or defend our legal rights
<p>Complying with our legal or regulatory obligations (such as our requirements to report to the GFSC)</p>	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend our legal rights • You have provided your consent. • We may need your consent for this activity in order to provide you with our services
<p>Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.</p>	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to ensure that we take all necessary precautions to prevent fraud) 	<ul style="list-style-type: none"> • It is necessary in order for us to comply with an enactment. • You have provided your consent. We may need your consent for this activity in order to provide you with our services • It is necessary to establish, exercise or defend our legal rights.
<p>Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)</p>	<ul style="list-style-type: none"> • We have a genuine business need (to continually improve our services) 	<ul style="list-style-type: none"> • You have provided your consent.

Managing our business operations such as maintaining accounting records, analysing financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business) 	
Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by Rossborough	<ul style="list-style-type: none"> We have a genuine business need (to market out services) 	
Tracing and recovering debt	<ul style="list-style-type: none"> We have a genuine business (to trace and receive any debt which is owed to us) 	<ul style="list-style-type: none"> It is necessary to establish, exercise or defend our legal rights
Monitoring usage of any of the various Rossborough websites	<ul style="list-style-type: none"> We have a genuine business need (to assess usage of our website) 	
To apply for and claim on our own insurance	<ul style="list-style-type: none"> We have a genuine business need (to have our own insurance) 	<ul style="list-style-type: none"> We have your consent It is necessary to establish, exercise or defend our legal rights
Who will we share your personal information with? ►		

From time to time, we may share your personal information with companies in the Rossborough or the Gallagher group or with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- other third parties who assist in the administration of insurance policies 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
- our third party services providers such as IT suppliers, finance and payment providers , actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

Third party claimant ►

This section will detail what personal information we collect about you and use if you have made a claim against a customer for whom we have placed insurance cover.

What personal information will we collect? ►

- General information such as your name, date of birth, gender and identification information such as social security number, passport number or driving licence number
- Contact details including address, telephone number and email address
- If relevant to your claim, we may collect the following information about you:
 - information about your job including job title, business description, education, employment history and professional certifications
 - your financial information such as your financial history and needs, income, bank details, payment details and information obtained as a result of our credit checks
- Information obtained when we carry out checks of sanction lists
- Information obtained through our use of cookies. Please see our cookies policy for more information
- Information captured during recordings of our telephone calls

What special categories of information will we collect? ►

- Details of your current or former physical or mental health if it is relevant to your claim – for example where you have been injured in a motor accident and the driver is insured under a policy we placed
- Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information if it is relevant to your claim or as a result of carrying out sanctions lists
 - We may also collect information because it is relevant to your claim, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions; trade union membership; or data concerning your sex life or sexual orientation, for example where we seek to validate or investigate a claim we may receive files containing any of the above information. We may also need to collect this information to assess the value of your claim
 - Any other special categories of information you offer up when communicating with us about your claim. We will only process such information to the extent that you have provided your consent or where in connection with legal proceedings.

How will we collect your personal information? ►

- Directly from you
- From our customer who is the policyholder
- From other third parties involved in the insurance process such as another broker and insurers
- From other third parties involved in the relevant insurance policy or claim such as other claimants, witnesses to an incident, loss adjusters, claims handlers and medical experts
- Via publically available sources such as internet search engines and social media sites
- From other companies within the Rossborough or Gallagher group
- Via insurance industry fraud prevention and detection databases and sanctions screening tools
- From government agencies and professional regulators

What will we use your personal information for? ►

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We have a genuine business need to use your personal information such as maintaining our business records, keeping records of insurance policies we place and claims made under such policies and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- You have provided your consent. There may be some circumstances that without your consent to use your special categories of information we would be unable to process your claim. We will notify you when this will be applicable and why your consent is necessary.
- Where the use of your special categories of information is necessary to establish, exercise or defend our legal rights, for example legal proceedings have been brought against us or we want to bring a legal claim ourselves.

Please click below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your special categories of information ►
To assist in any claims made under an insurance policy we placed	<ul style="list-style-type: none"> We have a genuine business need (to assist in any claims which have been made under an insurance policy we placed) 	<ul style="list-style-type: none"> You have provided your consent. We may need your consent for this activity in order to provide you with our services
Complying with our legal or regulatory obligations (such as our requirements to report to the GFSC)	<ul style="list-style-type: none"> We have a legal or regulatory obligation. 	<ul style="list-style-type: none"> It is necessary to establish, exercise or defend our legal rights You have provided your consent. We may need your consent for this activity in order to provide you with our services
Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.	<ul style="list-style-type: none"> We have a genuine business need (to ensure that we take all necessary precautions to prevent fraud) 	<ul style="list-style-type: none"> It is necessary in order for us to comply with an enactment. You have provided your consent. We may need your consent for this activity in order to provide you with our services It is necessary to establish, exercise or defend our legal rights
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)	<ul style="list-style-type: none"> We have a genuine business need (to continually improve our services) 	<ul style="list-style-type: none"> You have provided your consent.

<p>Managing our business operations such as maintaining accounting records, analysing financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)</p>	<ul style="list-style-type: none"> • We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business) 	
--	---	--

Who will we share your personal information with? ►

From time to time, we may share your personal information with companies in the Rossborough or Gallagher group or with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- other third parties who assist in the administration of insurance policies 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
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

Experts instructed in relation to claims ►

This section will detail what personal information we collect about you and use if you are an expert instructed in relation to a claim which has been made under an insurance policy we placed.

What personal information will we collect? ►

- General information such as your name, identification information such as national insurance number, passport number or driving licence number
- Contact details including address, telephone number and email address
- Information about your job including job title, business description, education, employment history and professional certifications

How will we collect your information? ►

- Directly from you
- From other third parties involved in the insurance process and claims process such as another broker and insurers
- Via publically available sources such as internet search engines and social media sites
- From other companies within the Rossborough or Gallagher group

What will we use your personal information for? ►

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We have a genuine business need to use your personal information such as maintaining our business records and keeping records of insurance policies we place and business entities we interact with and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information.

Please click below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your special categories of information ►
---------------------------------	--	---

To assist in any claims made under an insurance policy we have placed	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to assist customers in any claims they have) 	
Managing our business operations such as maintaining accounting records, analysing of financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> • We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business) 	

Who will we share your personal information with? ►

From time to time, we may share your personal information with companies in the Rossborough or Gallagher group or with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other third parties who assist in the administration of claims such as loss adjusters, claims handlers, accountants, auditors, lawyers and other experts
- investigative firms we ask to look into claims on our behalf in relation to suspected fraud
- our regulators
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers

Witnesses to an incident ►

This section will detail what personal information we collect about you and use if you are a witness to an incident which is the subject of a claim made under an insurance policy we have placed.

What personal information will we collect? ►

- General information such as your name, date of birth, gender and occupation
- Contact details including address, telephone number and email address
- Information which is relevant to the incident you witnessed

What special categories of information will we collect? ►

- Special categories of information will only be collected where it is relevant to an incident, for example a particular health condition that is of relevance to your statement

How will we collect your information? ►

- Directly from you
- From our customer who is the policyholder
- From other third parties involved in the claims process such as another broker and insurers
- From other third parties involved in the relevant claim such as claimants, other witnesses, loss adjusters, claims handlers and medical experts
- Via publically available sources such as internet search engines and social media sites

What will we use your personal information for? ►

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We have a genuine business need to use your personal information such as maintaining our business records and keeping records claims made under insurance policies we have arranged and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- You have provided your consent.
- Where the use of your special categories of information is necessary to establish, exercise or defend our legal rights, for example legal proceedings have been brought against us or we want to bring a legal claim ourselves.

Please click below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your special categories of information ►
To assist in any claims made under an insurance policy we placed	<ul style="list-style-type: none">• We have a genuine business need (to assist in any claims made under an insurance policy we have arranged)	<ul style="list-style-type: none">• We have your consent

<p>Complying with our legal or regulatory obligations (such as our requirements to report to the GFSC)</p>	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend our legal rights You have provided your consent.
<p>Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.</p>	<ul style="list-style-type: none"> • We have a genuine business need (to ensure that we take all necessary precautions to prevent fraud) 	<ul style="list-style-type: none"> • It is necessary in order for us to comply with an enactment You have provided your consent. • It is necessary to establish, exercise or defend our legal rights
<p>Managing our business operations such as maintaining accounting records, analysing of financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)</p>	<ul style="list-style-type: none"> • We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business) 	

Who will we share your personal information with? ►

From time to time, we may share your personal information with companies in the Rossborough or Gallagher group or with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other third parties who assist in the administration of insurance policies and claims 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
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

Brokers, insurers and reinsurers ►
This section will detail what personal information we collect about you and use if you are a wholesale broker, third party producing broker, an appointed representative, an insurer or reinsurer.
What personal information will we collect? ►
<ul style="list-style-type: none"> • General information such as your name, identification information such as national insurance number, passport number or driving licence number • Contact details including address, telephone number and email address • Information about your job including job title, business description, education, employment history and professional certifications • Information obtained when we carry out checks of sanction lists • Information obtained as a result of carrying out due diligence • Any information we record about your preferences when doing business with us
What special categories of information will we collect? ►
<ul style="list-style-type: none"> • Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information as a result of carrying out checks of sanctions lists • Any information we record that is relevant to you doing business with us
How will we collect your information? ►
<ul style="list-style-type: none"> • Directly from you • From other third parties involved in the insurance process such as another broker and insurers • Via publically available sources such as internet search engines and social media sites • From other companies within the Rossborough or Gallagher group • Via insurance industry fraud prevention and detection databases and sanctions screening tools

What will we use your personal information for? ►

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We need to use your personal information to enter into or perform our contract with you.

- We have a genuine business need to use your personal information such as maintaining our business records and keeping records of insurance policies we place and business entities we interact with and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.

- We have a legal or regulatory obligation to use your personal information.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- You have provided your consent.

- Where the use of your special categories of information is necessary to establish, exercise or defend our legal rights, for example legal proceedings have been brought against us or we want to bring a legal claim ourselves.

Please click below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your special categories of information ►
---------------------------------	--	---

<p>To enter into business relationships which facilitate and enable us to place insurance policies for our customers</p>	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to enter into arrangements with other insurance partners so that we can provide services to our customers) 	<ul style="list-style-type: none"> • You have provided your consent. We may need your consent for this activity in order to provide you with our services
<p>To carrying out fraud and anti-money laundering checks</p>	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a genuine business need (to ensure that we take all necessary precautions to prevent fraud) 	<ul style="list-style-type: none"> • It is necessary in order for us to comply with an enactment • It is necessary to establish, exercise or defend our legal rights.
<p>Managing our business operations such as maintaining accounting records, analysing of financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)</p>	<ul style="list-style-type: none"> • We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business) 	
<p>To apply for and claim on our own insurance.</p>	<ul style="list-style-type: none"> • We have a genuine business need (to have our own insurance) 	<ul style="list-style-type: none"> • We have your explicit consent • It is necessary to establish, exercise or defend our legal rights
<p>Who will we share your personal information with? ►</p>		

From time to time, we may share your personal information with companies in the Rossborough or the Gallagher group or with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other third parties who assist in the administration of insurance policies and claims 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
- 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
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please the "Contacting us" section below for our contact details.

Users of our various Rossborough websites ►

This section will detail what personal information we collect about you and use if you access and use any of the Rossborough websites.

What personal information will we collect? ►

- General information collected via the website such as your name
- Contact details including telephone number and email address
- Your marketing preferences
- Information obtained through our use of cookies. Please see our cookies policy [here] for more information

How will we collect your personal information? ►

- Directly from any of the Rossborough websites you use

What will we use your personal information for? ►

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We have a genuine business need to use your personal information such as maintaining our business records, monitoring usage of our website and marketing our services and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

Please click below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing ►	Legal grounds for using your personal information ►	Legal grounds for using your special categories of information ►
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none">• We have a genuine business need (to respond to any enquiries)	
Monitoring usage of any of the various Rossborough websites	<ul style="list-style-type: none">• We have a genuine business need (to assess usage of our website)	

Who will we share your personal information with? ►

We may share your personal information with companies in the Rossborough or Gallagher group for the purposes set out above.

4. How do we protect your personal information when sending it abroad?

An authorised jurisdiction is (a) the Bailiwick of Guernsey, (b) a Member State of the European Union,
(c) any country, any sector within a country, or any international organisation that the Commission has determined ensures an adequate level of protection within the meaning of Article 45(2) of the GDPR (or the equivalent article of the former Directive), and for which the determination is still in force, or
(d) a designated jurisdiction which is (i) the United Kingdom, (ii) a country within the United Kingdom, (iii) any other country within the British Islands, or (iv) any sector within a country mentioned in (i), (ii) or (iii) (**Authorised Jurisdictions**).

An unauthorised jurisdiction is a jurisdiction which is not an Authorised Jurisdiction (**Unauthorised Jurisdiction**).

We may transfer the personal information we collect about you to countries which are Authorised Jurisdictions other than Member States of the European Union. In this circumstance, there will be an adequacy decision in force in respect of the country or the Authorised Jurisdiction will be a designated

jurisdiction which is (i) the United Kingdom, (ii) a country within the United Kingdom, (iii) any other country within the British Islands, or (iv) any sector within a country mentioned in (i), (ii) or (iii).

We may transfer the personal information we collect about you to countries which are Unauthorised Jurisdictions. To ensure that your personal information does receive an adequate level of protection we will put in place appropriate measures to ensure that your personal information is treated by those

third parties in a way that is consistent with and which respects Guernsey laws on data protection:

Our regular transfers to Unauthorised Jurisdictions include:

Country of transfer	Reason for the transfer	Method we use to protect your information
----------------------------	--------------------------------	--

United States	Central IT systems (including corporate emails) are routed through our US parent company AJG & Co.	Intragroup data transfer agreement (utilising Standard Contractual Clauses (Controller to Controller))
---------------	--	--

India	To assist with our back office functions	Intragroup data transfer agreement (utilising Standard Contractual Clauses (Controller to Processor))
-------	--	---

Where other transfers to Unauthorised Jurisdictions take place this will be subject to appropriate mechanisms to ensure they have an adequate level of protection.

If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please contact us using the details set out in the "Contacting us" section.

5. What marketing activities do we carry out? ►

If you have provided your consent for marketing, we may from time to time provide you with information about our products or services or those of our partners.

We will send you marketing communications where we think you will be interested in receiving them. An "unsubscribe" link appears in all our marketing emails. To unsubscribe from emails sent by us, simply click on the link at any time. Alternatively, you can contact us to update your preferences at uk.unsubscribe@rossboroughgroup.co.uk. In such circumstances, we will continue where necessary to send you (non-marketing) service related communications.

6. 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 Privacy Policy and to comply with our regulatory and/ or legal obligations.

We have a detailed retention policy in place which governs how long we will hold different types of information for. The exact time period will depend on the purpose for which we collected that information, for example:

Purpose	Retention period
Providing a quote	15 months from date of collection
Providing or administering an insurance policy	Depending on the type of policy this would be between 10 and 40 years from date of policy inception
Handling a claim	6 years from first date of claim notification
Dealing with a complaint	5 years from first date of complaint notification

For further information regarding how long your personal information will be kept, please our contact details in see the "Contacting us" section.

7. Automated processing

Where a decision is necessary in relation to your insurance policy sometimes we may make decisions using automated means. The automated process will consider the information that you provide us (for example, details of the property that you wish to insure), as well as other information such as postcode and local crime rate, to determine whether your application for insurance can be accepted and the premium price. Where we make automated decisions about you, you may request that decision is reviewed by an individual decision-maker.

8. 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 the "Contacting us" section.

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 can't comply with your request, we will tell you the reason, and we will always respond to any request you make.

There may also be circumstances where exercising some of these rights (such as the right to erasure, the right to restriction of processing and the right to withdraw consent) will mean your insurance can no longer be provided and it may therefore result in cancellation of your policy. You will therefore lose the right to bring any claim or receive any benefit, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

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. If we have disclosed personal data to another person, we must notify that person of the rectification unless impracticable, and must notify you of the contact details of the other person if requested.

- **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. If we have disclosed personal data to another person, we must notify that person of the rectification unless impracticable, and must notify you of the contact details of the other person if requested.

• **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. If we have disclosed personal data to another person, we must notify that person of the rectification unless impracticable, and must notify you of the contact details of the other person if requested.

• **The right to data portability ►**

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

• **The right to object to marketing ►**

You can ask us to stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" link which is contained in any email that we send to you or you can use the details set out in the "Contacting us" section to contact us. If you opt out of receiving marketing messages, we may still send you (non-marketing) service related communications where necessary. You also have the right to object if data were being processed for the purpose of public functions or legitimate interests or for historical or scientific purposes.

• **Rights relating to automated decision-making ►**

You can contact us using the details set out in the "Contacting us" section and ask us to review the decision if you have been subject to an automated decision and do not agree with the outcome.

• **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.

• **The right to lodge a complaint with the ICO ►**

You have a right to complain to the Data Protection Authority and to appeal any decisions 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 Data Protection Commissioner's Office website: <https://dataci.gg>

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

9. How we protect your information ►

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 Rossborough 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.

10. Contacting us ►

You may contact our Data Protection Officer or the data controller if you have any questions about how we collect, store or use your personal information:

Data Protection Officer – Rossborough Group
c/o Gallagher
The Walbrook Building
25 Walbrook
London EC4N 8AW

UK.DPO@rossboroughgroup.co.uk

Contact information for the data controllers Rossborough Healthcare International Limited and R.A. Rossborough (Guernsey) Limited is as follows:

Compliance Department – Rossborough Group
PO Box 127,
Rossborough House,
Bulwer Avenue,
St Sampsons,
Guernsey,
GY1 3HG

11. Updates to this Privacy Policy ►

We may need to make changes to this Privacy Policy periodically, for example, as the result of regulations, new technologies, or other developments in data protection laws or privacy generally. You will be provided with a copy of the most up-to-date Privacy Policy and you can also view it by checking our website from time to time.

This Privacy Policy was last updated on: 1 June 2018