# Privacy Notice last updated: 14<sup>th</sup> June 2018

In accordance with the General Data Protection Regulation and related UK data protection legislation, we are committed to protecting the confidentiality and security of the information that you provide to us.

This Privacy Notice is designed to help you understand how we collect and use your information. We may collect information from you about other people, for example, tenants that you may sublet your property to. If you give us information about another person it is your responsibility to ensure and confirm that:

- You have told the individual who we are and how we use personal information, as set out in this Privacy Policy; and
- You have permission from the individual to provide that personal information to us and for us to use it, as set out in this Privacy Notice.

We may change and update this policy from time to time and any updates will be made available on this page, so please check back here for the latest policy.

Your submission of such information to us represents your agreement to this Privacy Policy.

If you have any questions or queries about this policy please contact us.

#### Who are We?

Residents Insurance Services Limited (also referred to in this Notice as "we", "us", or "our" or "RIS") is a specialist property insurance broker.

Our registered Company number and address are:

Company number - 3952276

Botanic House Hills Road Cambridge England CB2 1PH

#### **How Can You Contact Us?**

For any questions or concerns relating to this Privacy Policy or our data protection practices, or to make a subject access or any other request regarding the information we hold, please contact us at:

## **General Enquiries**

Residents Insurance Services Ltd Building 4 Imperial Place Elstree Way Borehamwood Herts WD6 1JN

Tel -0208 238 6499

Email - <u>info@residentsinsurance.co.uk</u> Website - <u>www.residentsinsurance.co.uk</u>

If you wish to submit a Subject Access Request to understand what personal information we hold for you please contact us at the address above or email us at info@residentsinsurance.co.uk.

#### What Information Do We Collect and How Do We Collect It?

The data that we collect from you is used to provide and enhance our service.

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number(s)
- Cookies and Usage Data

If you make a payment on our website, or on our automated telephone payment line, your card information is not held by us. It is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

#### Information from Other Sources

We may use legal public services such as HM Land Registry and other local government authorities to obtain information about you, for example to verify the ownership of a particular property.

Such information will only be obtained from reputable sources which operate in accordance with the General Data Protection Regulation.

## **Use of Cookies**

Cookies are small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in

your browser. We suggest consulting the Help section of your browser or taking a look at the <u>About Cookies website</u> which offers guidance for all modern browsers

By agreeing to use cookies registered to our website, we may also collect data on how you interact with our service and your activity on our website. This data may include, but is not limited to:

- Internet Protocol Address (IP Address)
- Data and time of your visit
- Browser Type and Version
- Pages on our website that you visit
- The time spent on each page

Please see our Cookie Policy for further details.

#### **How Is Your Information Used?**

We may use your information to, but not limited to:

- To carry out any obligations as set out in the terms of the lease between leaseholder and freeholder
- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features on our website when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues

# **How Long Will We Keep Your Information For?**

We will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. With this in mind we will hold your data for a minimum of six years, unless you tell us otherwise.

We continually review this retention period to ensure we process your personal data within the statutory requirements contained within the General Data Protection Regulation.

#### Who Has Access To Your Data?

We will not sell or give your personal data to any third party in exchange for money.

We will not share your personal data with any third party for marketing purposes.

We may employ third party companies and individuals to help deliver our service on our behalf, to perform service-related services, or to assist us in analysing how our service is used. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and are obligated not to disclose or use it for any other purpose.

Third party providers that we may transfer personal data to include, but not limited to:

- Software and IT providers
- Solicitors
- Insurance companies, brokers and loss adjusters
- Property Managing Agents

Card transactions and payments made on our website or automated telephone payment line is processed by a third party payment processor, in line with the HSBC payment system. All Transactions are secured using up to date protocols and industry recognised security best practices.

# When Would You Disclose My Personal Information?

Residents Insurance Services Ltd may disclose your personal data in order to comply with:

- A legal obligation
- Protection and defence of the rights or property of RIS
- Prevention or investigation of possible wrongdoing in connection with our service
- Protection of the personal safety of users of the Service or the public
- To protect against legal liability

### **How Will We Protect Your Personal Information?**

The security of all data that we collect, be it personal information or not, is extremely important to us. We recognise the need that this data be protected at all times. Whilst we strive to use industry recognised best practices to secure all data we hold, we cannot guarantee its absolute security. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## Where Will We Transfer Your Personal Information To?

Certain personal information held within our systems may be transferred across geographical borders in accordance with applicable law, or where you have provided contact and/or correspondence details that reside outside of the UK.

By providing us with your information, you consent to the collection, international transfer, storage, and processing of your information. These transfers are governed by European Union (EU) standard

contractual clauses or equivalent data transfer agreements to protect the security and confidentiality of personal information.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

# What Are Your Rights?

Residents Insurance Services Ltd aim to take all reasonable steps to allow you to amend, delete, correct, or limit the use of your personal data.

In summary your rights under the General Data Protection Regulation include:

- The right to be informed about our data processing activities, including through Privacy Notices such as this.
- The right of access to the personal information we hold about you. To request a copy of this information you must make a subject access request in writing to us. (please see details below).
- The right of rectification. You may ask us to correct any inaccurate or incomplete data.
- The right to erasure and to restrict processing. You have the right to have your personal data erased and to prevent processing except where we have a legal obligation to process your personal information. You should bear in mind that by exercising this right you may hinder or prevent our ability to provide services to you.
- The right to data portability. On your request, we will provide you with your personal data in a commonly used format to allow you manage and move it.
- The right to object. You have particular rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for profiling, direct marketing or research purposes.

Where possible, you can update your personal data in the 'My Account' section of our website. You will need to be registered and authorised before you can access your personal data via our website. Alternatively, you may contact us to request any changes to be made.

RIS is obliged to provide a response to your request within one month of receipt of the request. Where requests are complex or we are dealing with numerous requests we may extend this for a further two months, but you will be notified in these circumstances within one month of receipt of your request.

# **Privacy of Children**

We do not knowingly process data of anyone under the age of 16. If you are the parent or guardian and you aware that we hold personal data on your children please contact us. We will take necessary steps to stop processing this data once notified.

# **Special Category Data**

We do not knowingly process any special category data, details of which are listed below. Special category data is more sensitive and so needs more stringent protection. Special category data include, but is not limited to , information about an individual's race, ethnic origin, political or religious beliefs, trade union membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation.

We will take necessary steps to stop processing this data once notified.

## **Complaints Or Queries**

RIS tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

This Privacy Notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of the company's collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can raise your concerns with the Information Commissioner's Office:

The Information Commissioner 0303 123 1113 or if you are outside of the UK +44 1625 545 700.

Additional information about the Information Commissioners Office can be found by visiting their website at <a href="https://www.ico.gov.uk">www.ico.gov.uk</a>.