FAIR PROCESSING NOTICE

This document explains how we use personal information.

You have the right to object to us using your personal information. You can do this at any time by telling us and we will consider your request and either stop using your personal information or explain why we are not able to.

Our contact details can be found below.

What information do we require?

Renovation Underwriting Ltd will collect personal data about you, which will include your name, address, details of your insurance requirements and contact information. Depending on the nature of the insurance, we will also need to collect sensitive personal information such as health conditions or any convictions. Please refer to the list below for more examples:-

- basic personal details such as name, age, address and gender
- family, lifestyle and social circumstances, such as marital status, dependents and employment type
- financial details such as direct debit or payment card information
- photographs and/or video to help us manage policies and assess claims
- tracking and location information if it is relevant to your policy or claim
- identification checks and background insurance risk details including previous claims information
- medical information if it is relevant to your policy or claim
- criminal convictions if it is relevant to your policy or claim
- accessibility details if we need to make reasonable adjustments to help business activities if it is relevant to your policy or claim

This information can relate to anyone seeking an insurance quote from us now or in the future or whose details are provided during the quotation process. It will even extend to anyone who may benefit from or be directly involved in the quotation, policy or a claim. Before you disclose any information about another person you must make sure that you have their permission to give us these details and that they understand how it will be used.

In all cases, we will limit the information we collect from you to that information which is strictly necessary to meet your insurance needs.

Why we need to take these details

We will use the personal information in a number of ways: -

- to provide quotes, administer policies and policyholder claims to fulfil our contract
- deal with complaints and prevent financial crime to meet our legal obligations
- to send marketing information if we have received your specific consent
- to manage our business and conduct market research to meet the legitimate needs of our business

Legal Basis

All processing (i.e. use) of your personal information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that:

- the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract (e.g. where we use personal information to generate user credentials for you or your legal representative to access and review your data on our electronic discovery and disclosure platform);
- the processing is necessary for us to comply with a relevant legal obligation (e.g. where we are required to make disclosures to courts or regulators); or

In limited circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required to obtain your prior consent in order to send you marketing communications.

What we do with your data

All of this data will be processed and stored by our staff based in the UK where it is protected by UK law. We may transfer your personal information to Insurers or other third parties to manage your insurance policy or claim. Such transfers would only occur within the UK, or within the EU. The information will be treated as confidential and will not be disclosed to any third parties other than: -

- insurers, third party underwriters, reinsurers, insurance intermediaries, regulators, law enforcement, the Financial Ombudsman Service (FOS); and other organisations that provide services to us or you
- in the event of a claim we may need to forward your details to a loss adjustor or third party who is involved in the settlement of a claim
- credit reference, fraud prevention and other agencies that carry out certain activities on our behalf
- Third party service providers we have engaged to facilitate our offering, for example, our underwriting platform providers and our management information providers

In addition, we will use your information to tell you about changes which may affect your insurance or advice on risk management. We may also tell you about other products and services that we can offer which would complement your existing portfolio. You can opt out from this at any point.

How long do we retain your details?

The information you provide will be kept for as long we need it to administer your policy. We will then keep these details for 7 years after your policy lapses if required to by the Insurer.

What are your rights?

At any time you can ask to view the information that we hold on file for you. If for any reason the information is incorrect you can ask for it to be updated or even deleted. In addition you can ask that we restrict the use of your data, object to how we use you data or completely stop using the information we hold on file. However please note that if we do not hold all the relevant details this will affect our capacity to manage your policy or assist in the event of a claim. Your rights are categorised as follows:

The right to make a data subject access request The right of rectification The right to be forgotten The right of restriction The right to object

If you wish to exercise any of these rights or have any questions about how we use your personal information you can do so by contacting our Data Protection Officer:

Address:

The Data Protection Officer, Renovation Underwriting Ltd, 17 Church Street, St Neots, Cambs, PE19 2BU Email: <u>Douglas.brown@renovationunderwriting.com</u> Phone: 0333 358 0006

Or if you wish to make a complaint we encourage you to come to us in the first instance but you are entitled to complain directly to the Information Commissioner's Office (ICO) https://www.ico.gov.uk

Changes to our Fair Processing Notice

Occasionally it may be necessary to make changes to this notice. When that happens we will provide you an updated version at the earliest opportunity. The most recent version will always be available on our website.

www.renovationunderwriting.com