

VERSION 2  
22 MAY 2018



## PRIVACY POLICY

PRESENTED BY: SIMON MARLOW

CARROLL INSURANCE GROUP LIMITED  
2 WHITE LION COURT, CORNHILL, LONDON

# SYNOPSIS & LAYOUT OF THIS DOCUMENT

This document details the Privacy Policy for Carroll Insurance Group and related companies. Along with a number of other policy and reference documents, this forms the internal Carroll Insurance Group Privacy Policy.

Being transparent and providing accessible information to individuals about how the company uses their personal data is a key part of the EU General Data Protection Regulation. The most common way to provide this information is in a privacy notice.

The purpose of this policy is to take the Information Commissioner's Office (ICO) guidelines and recommendations to create a clear and effective privacy notice. In respect to the structure of this document, please note that we have split it into the following two sections:

- London Market Association Notice (explaining how the insurance market works and how your personal data is used)
- Privacy Policy (Carroll Insurance Group Limited's own policy for all other aspects of clients personal data)

The 'privacy policy' is used to describe all the privacy information that you make available or provide to individuals when you collect information about them.

This is a working document, and should have its component parts updated in line with any amendments to the law, working practices and policy requirements. Each embedded document that is updated should have the version number incremented, complete with change control detail, and a summary and matching revision increment to the body document.

## INSURANCE MARKET INFORMATION NOTICE

**Insurance** is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including your **personal data**, needs to be shared between different **insurance market participants**. The insurance market is committed to safeguarding that information.

This notice is designed to help you understand how the **insurance market participants** process your **personal data** through the **insurance lifecycle**.

**Insurance market participants** may link to, or refer to, this notice from their own information notices or consent wordings [and this notice should be read in conjunction with the participant's own information notice.]

In this notice:

- **we, us** or **our** refers to the relevant **insurance market participant**;
- **you** or **your**, refers to the individual whose **personal data** [may be/is being] processed by an **insurance market participant** (**you** may be the insured, beneficiary, claimant or other person involved in a claim or relevant to a policy). There are other terms in **bold** with specific meanings. Those meanings can be found by clicking [[here](#)]

This notice sets out the following (click on each heading to take you to the relevant section):

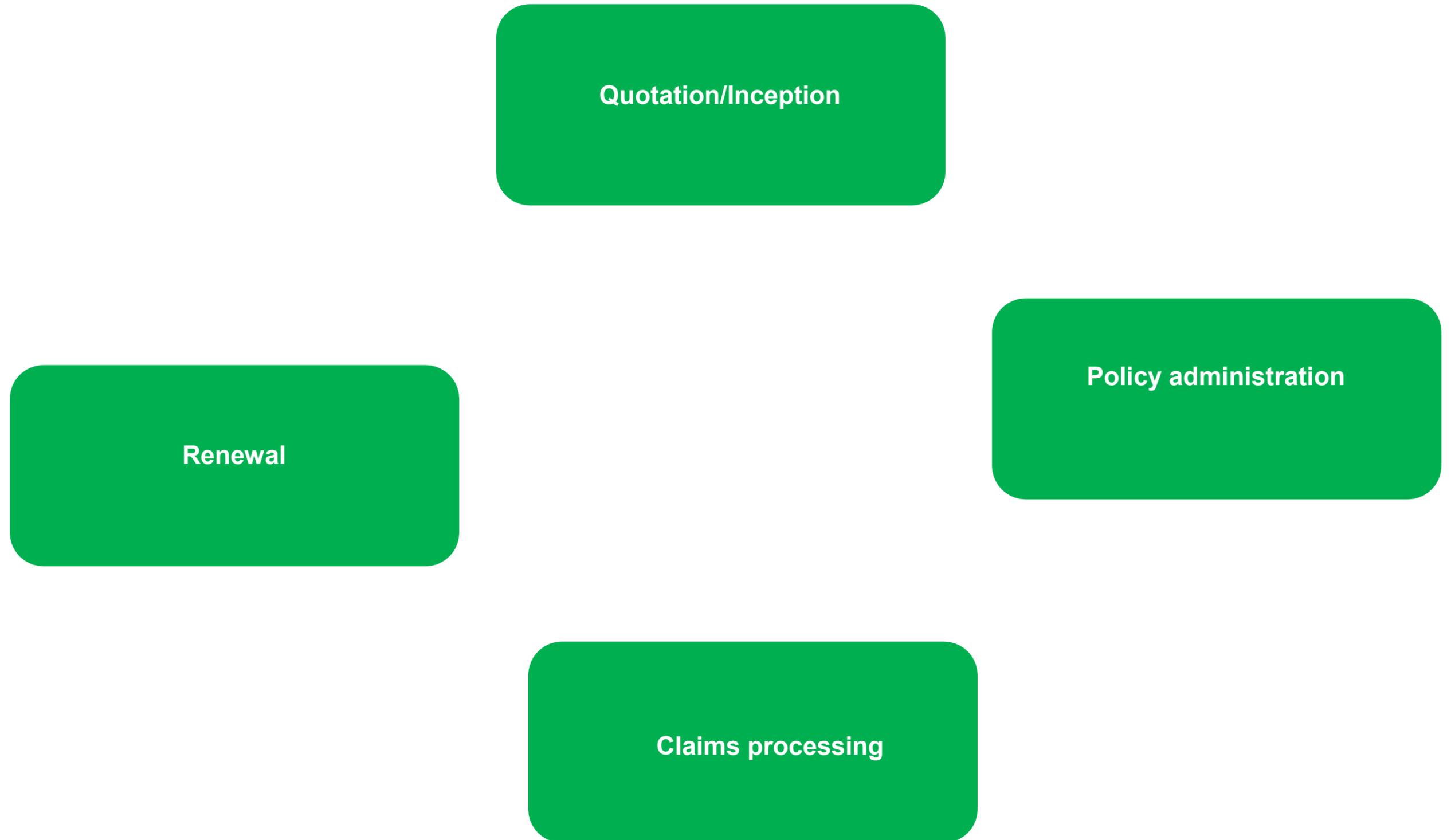
1. [INTRODUCTION – HOW THE INSURANCE MARKET WORKS](#)
2. [THE DATA WE MAY COLLECT ABOUT YOU \(YOUR PERSONAL DATA\)](#)
3. [WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM](#)
4. [IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS](#)
5. [THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA](#)
6. [CONSENT](#)
7. [PROFILING](#)
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11. [GLOSSARY OF KEY TERMS](#)

[APPENDIX 1 - THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA – This sits under section 5 and is converted into a dynamic list of purposes that opens up if you click on a purpose and gives an option of which Participant's processing you want to review. Mark to suggest how to amalgamate certain purposes.]

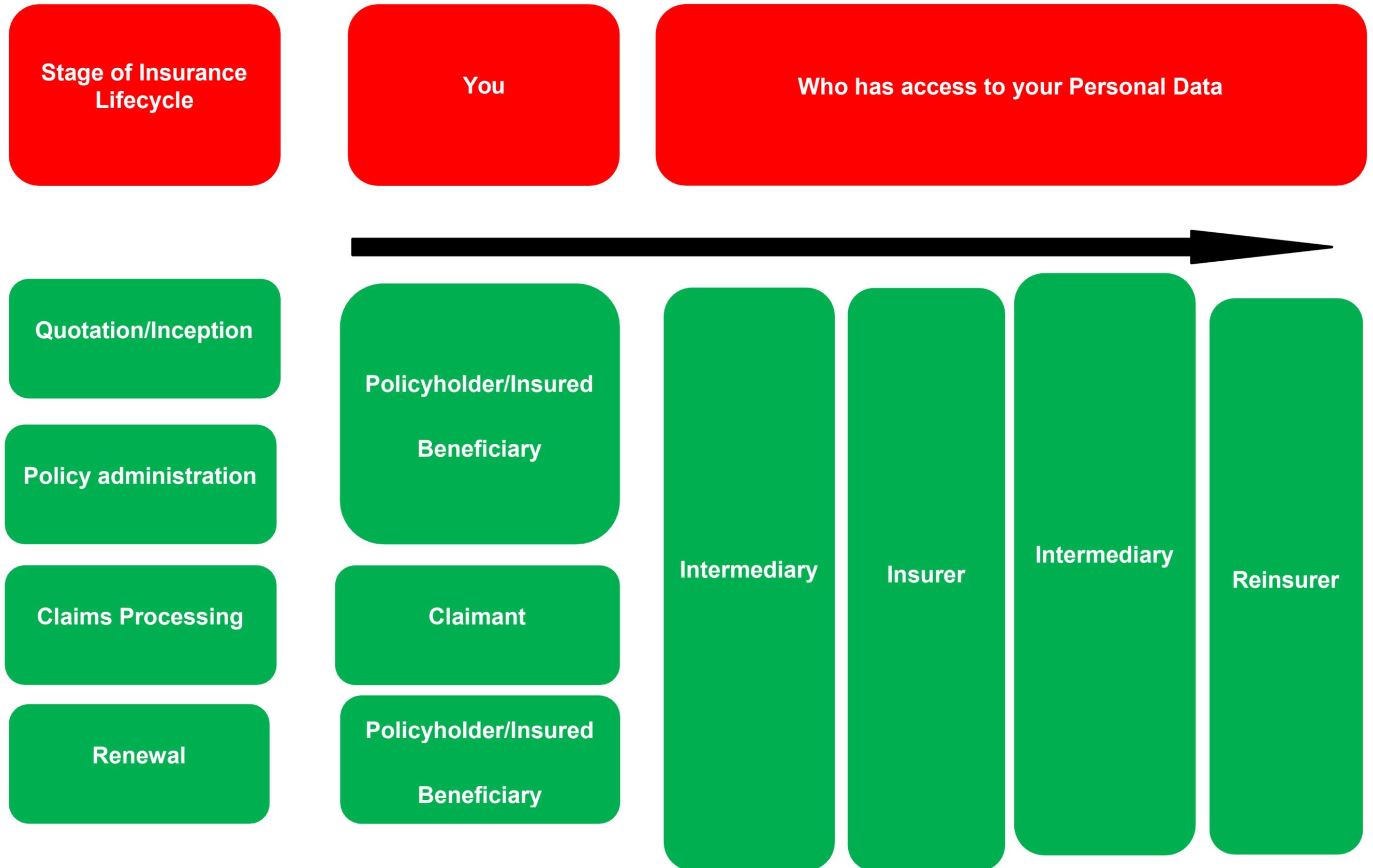
[APPENDIX 2 – LIST OF THE LEGAL GROUNDS WE RELY ON – This is just available through a link]

1. INTRODUCTION – HOW THE INSURANCE MARKET WORKS

INSURANCE LIFECYCLE



FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE



## 2. THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

In order for **us** to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, **we** need to collect and process personal data about **you**. The types of personal data that are processed may include:

Types of Personal Data	Details
<b>Individual details</b>	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to <b>you</b>
<b>Identification details</b>	Identification numbers issued by government bodies or agencies, including <b>your</b> national insurance number, passport number, tax identification number and driving license number
<b>Financial information</b>	Bank account or payment card details, income or other financial information
<b>Risk details</b>	Information about <b>you</b> which <b>we</b> need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to <b>your</b> health, criminal convictions, or other <b>special categories of personal data</b> . For certain types of policy, this could also include <b>telematics data</b> .
<b>Policy information</b>	Information about the quotes <b>you</b> receive and policies <b>you</b> take out
<b>Credit and anti-fraud data</b>	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to <b>you</b>
<b>Previous and current claims</b>	Information about previous and current claims, (including other unrelated insurances), which may include data relating to <b>your</b> health, criminal convictions, or other <b>special categories of personal data</b> and in some cases, surveillance reports
<b>Special categories of personal data</b>	Certain categories of <b>personal data</b> which have additional protection under the <b>GDPR</b> . The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation

## 3. WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

**We** might collect **your personal data** from various sources, including:

- **you**;
- **your** family members, employer or representative;
- other **insurance market participants**;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies such as the DVLA and HMRC;
- open electoral register; or
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers

Which of the above sources apply will depend on **your** particular circumstances.

#### 4. IDENTITIES OF DATA CONTROLLERS AND DATA PROTECTION CONTACTS

The **insurance lifecycle** involves the sharing of **your personal data** between **insurance market participants**, some of which **you** will not have direct contact with. In addition, **your personal data** may not have been collected directly by an **insurance market participant**.

**You** can find out the identity of the initial **data controller** of **your personal data** within the insurance market life-cycle in the following ways:

- Where you took out the insurance policy yourself: the **insurer** and, if purchased through an **intermediary**, the **intermediary** will be the initial **data controller** and their **data protection contact** can advise **you** on the identities of other **insurance market participants** that they have passed your **personal data** to.
- 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 the **insurer** or **intermediary** that they provided **your personal data** to and **you** should contact their **data protection contact** who can advise **you** on the identities of other **insurance market participants** that they have passed **your personal data** to
- 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 **participant's data protection contact**.

#### 5. THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

**We** set out below the purposes **insurance market participants** might use **your personal data** for. If you click on a purpose you can see:

- If that type of **insurance market participant** uses **your personal data** for that particular purpose
- The categories of **personal data** it collects
- What **personal data** it might provide to third parties (disclosures).
- The legal grounds for processing that **personal data**. Those legal grounds are set out in the **GDPR**.

##### Purposes

##### Quotation/Inception:

- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks
- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual

##### Policy administration:

- Client care, including communicating with you and sending you updates
- Payments to and from individuals

##### Claims Processing:

- Managing insurance and reinsurance claims
- Defending or prosecuting legal claims
- Investigation or prosecuting fraud

##### Renewals:

- Contacting the insured/policyholder to renew the insurance policy
- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual

##### Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:

- Complying with our legal or regulatory obligations
- General risk modelling
- Transferring books of business, company sales & reorganisations

Please note that in addition to the disclosures **we** have identified against each purpose, **we** may also disclose **personal data** for those purposes to our service providers, contractors, agents and group companies that perform activities on **our** behalf.

## 6. CONSENT

In order to provide insurance cover and deal with insurance claims in certain circumstances **insurance market participants** may need to process **your special categories of personal data**, such as medical and criminal convictions records, as set out against the relevant purpose.

**Your consent to this processing may be necessary for the insurance market participant to achieve this.**

**You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.**

## 7. PROFILING AND AUTOMATIC DECISION MAKING

When calculating insurance premiums **insurance market participants** may compare your **personal data** against industry averages. Your personal data may also be used to create the industry averages going forwards. This is known as profiling and is used to ensure premiums reflect risk.

Profiling may also be used by **insurance market participants** to assess information you provide to understand fraud patterns.

Where **special categories of personal data** are relevant, such as medical history for life insurance or past motoring convictions for motor insurance, **your special categories of personal data** may also be used for profiling.

**Insurance market participants** might make some decisions based on profiling and without staff intervention (known as automatic decision making). **Insurance market participants** will provide details of any automated decision making they undertake without staff intervention in their information notices [and upon request] including:

- where they use such automated decision making
- the logic involved
- the consequences of the automated decision making
- any facility for **you** to have the logic explained to **you** and to submit further information so the decision may be reconsidered.

## 8. RETENTION OF YOUR PERSONAL DATA

**We** will keep **your** personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either **you** or **we** may wish to bring a legal claim under this insurance, or where **we** are required to keep **your personal data** due to legal or regulatory reasons.

## 9. INTERNATIONAL TRANSFERS

**We** may need to transfer **your** data to **insurance market participants** or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the **GDPR**.

If **you** would like further details of how **your personal data** would be protected if transferred outside the EEA, please contact the **data protection contact** of the relevant **participant**.

## 10. YOUR RIGHTS AND CONTACT DETAILS OF THE INFORMATION COMMISSIONERS OFFICE (ICO)

If you have any questions in relation to **our** use of **your personal data**, you should first contact the **data protection contact** of the relevant **participant**. Under certain conditions, you may have the right to require **us** to:

- provide **you** with further details on the use **we** make of **your personal data/special category of data**;
- provide **you** with a copy of the **personal data** that **you** have provided to **us**;
- update any inaccuracies in the **personal data** **we** hold;
- delete any **special category of data/personal data** that **we** no longer have a lawful ground to use;
- where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing;
- object to any processing based on the legitimate interests ground unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights; and
- restrict how **we** use **your personal data** whilst a complaint is being investigated.

In certain circumstances, **we** may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and **our** interests (e.g. the maintenance of legal privilege).

**Your right to complain to the ICO:**

If **you** are not satisfied with **our** use of **your personal data** or **our** response to any request by **you** to exercise any of **your** rights in SECTION 10, or if you think that we have breached the **GDPR**, then **you** have the right to complain to the **ICO**. Please see below for contact details of the **ICO**.

England	Scotland	Wales	Northern Ireland
Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF	Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HL	Information Commissioner's Office 2nd floor Churchill House Churchill way Cardiff CF10 2HH	Information Commissioner's Office 3rd Floor 14 Cromac Place Belfast BT7 2JB
Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)	Tel: 0131 244 9001	Tel:029 2067 8400	Tel: 0303 123 1114 (local rate) or 028 9027 8757 (national rate)
Email: <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>	Email: <a href="mailto:scotland@ico.org.uk">scotland@ico.org.uk</a>	Email: <a href="mailto:wales@ico.org.uk">wales@ico.org.uk</a>	Email: <a href="mailto:ni@ico.org.uk">ni@ico.org.uk</a>

## 11. GLOSSARY

### Key insurance terms:

**Beneficiary** is an individual or a company that an insurance policy states may receive a payment under the insurance policy if an insured event occurs. A beneficiary does not have to be the **insured/policyholder** and there may be more than one beneficiary under an **insurance policy**

**Claimant** is either a **beneficiary** who is making a claim under an **insurance policy** or an individual or a company who is making a claim against a **beneficiary** where that claim is covered by the **insurance policy**

**Claims processing** is the process of handling a claim that is made under an insurance policy

**Quotation** is the process of providing a quote to a potential **insured/policyholder** for an **insurance policy**

**Inception** is when the **insurance policy** starts

**Insurance** is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression **insurance** may also mean **reinsurance**

**Insurance policy** is a contract of insurance between the **insurer** and the **insured/policyholder**

**Insurance market participant(s) or participants:** is an **intermediary, insurer** or **reinsurer**

**Insured/policyholder** is the individual or company in whose name the **insurance policy** is issued. A potential insured/policyholder may approach an **intermediary** to purchase an **insurance policy** or they may approach an **insurer** directly or via a price comparison website.

**Insurers:** (sometimes also called underwriters) provide insurance cover to **insured/policyholders** in return for **premium**. An **insurer** may also be a **reinsurer**.

**Intermediaries** help **policyholders** and **insurers** arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through **intermediaries**

**Lloyd's:** many policies are underwritten in Lloyd's of London. Lloyd's is a specialist insurance market place. To find out more about how Lloyd's operates please click here; <https://www.lloyds.com/about-lloyds/what-is-lloyds>

**Policy administration** is the process of administering and managing an **insurance policy** following its **inception**

**Premium** is the amount of money to be paid by the **insured/policyholder** to the **insurer** in the **insurance policy** **Reinsurers** provide insurance cover to another **insurer** or **reinsurer**. That insurance is known as reinsurance

**Renewal** is the process of the **insurer** under an **insurance policy** providing a **quotation** to the **insured/policyholder** for a new **insurance policy** to replace the existing one on its expiry

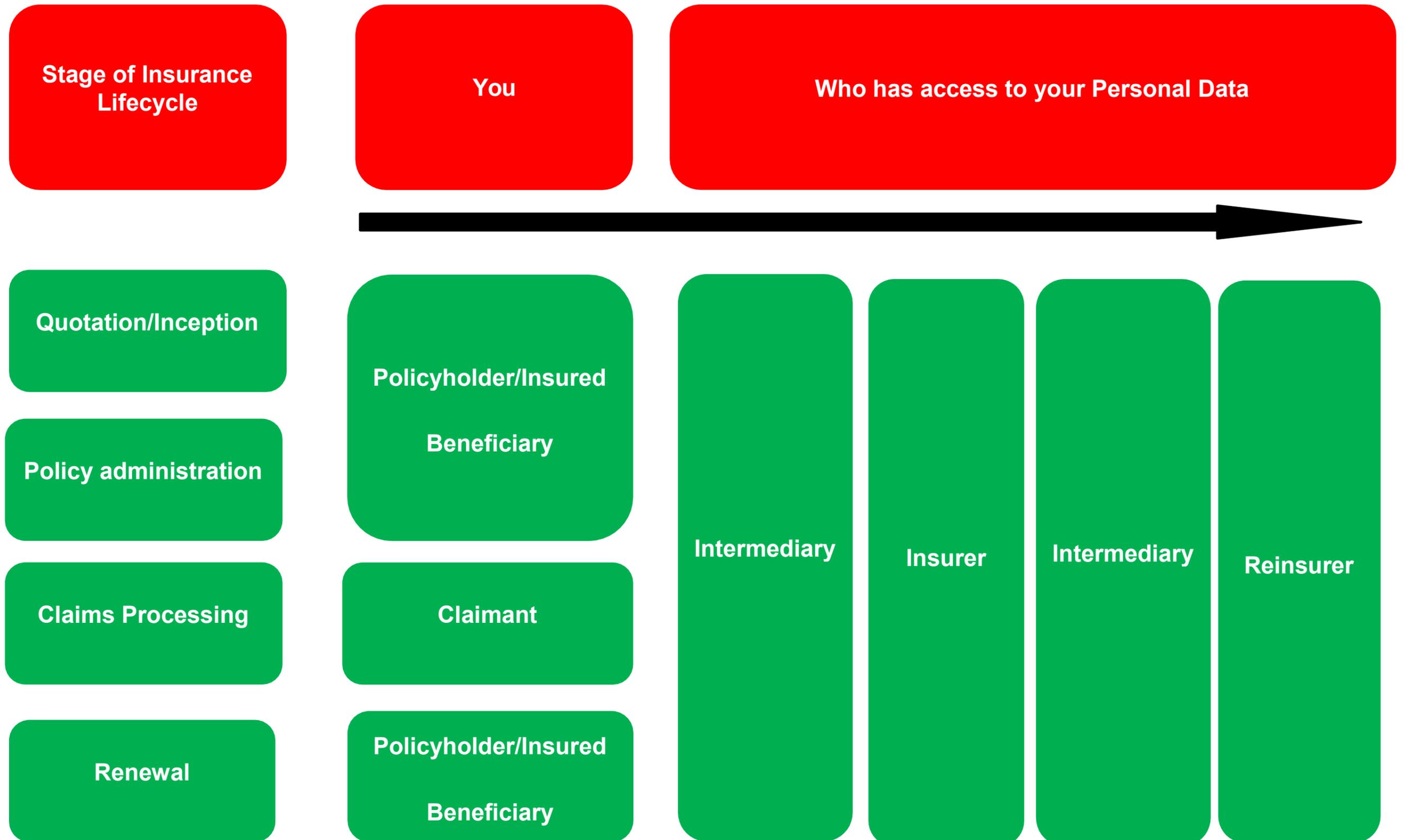
**We, us** or **our** refers to the relevant **insurance market participant** [link to diagram with policyholder, insurer, broker, reinsurer].

**You** or **your** refers to the individual whose **personal data** may be processed by an **insurance market participant**. **You** may be the insured, beneficiary, claimant or other person involved in a claim or relevant to an **insurance policy**

### Key data protection terms:

**GDPR:** is the EU General Data Protection Regulation, including the new UK Data Protection Act 2018.

APPENDIX 1: THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA



PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
<b>QUOTATION/INCEPTION</b> Setting you up as a client, including fraud, credit and anti-money laundering and sanctions checks	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Performance of our contract with you</li> <li>Compliance with a legal obligation</li> <li>Legitimate interests (to ensure that the client is within our acceptable risk profile)</li> <li>To assist with the prevention of crime and fraud</li> </ul>	<ul style="list-style-type: none"> <li>Credit reference agencies</li> <li>Anti-fraud databases</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Performance of our contract with you</li> <li>Compliance with a legal obligation</li> <li>Legitimate interests (to ensure that the client is within our acceptable risk profile)</li> </ul>	<ul style="list-style-type: none"> <li>Group companies providing administration</li> <li>Credit reference agencies</li> <li>Anti-fraud databases</li> </ul>			
	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> </ul>	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>In the substantial public interest</li> <li>Consent</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> </ul>	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>In the substantial public interest</li> <li>Consent</li> </ul>				
<b>QUOTATION/INCEPTION</b> Evaluating the risks to be covered & matching to appropriate policy/premium	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to determine the likely risk profile and appropriate insurer and insurance product)</li> </ul>		<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium)</li> </ul>		<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legitimate interests (to determine the likely risk profile and appropriate insurance product and premium)</li> </ul>	
	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Risk Details</li> <li>Previous claims</li> <li>Credit and anti-fraud data</li> </ul>	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Risk Details</li> <li>Previous claims</li> <li>Credit and anti-fraud data</li> </ul>	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Previous claims</li> </ul>	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>	

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
<b>QUOTATION/INCEPTION and POLICY ADMINISTRATION</b> Collection or refunding of Premium	<ul style="list-style-type: none"> <li>Individual details</li> <li>Financial information</li> </ul>	<ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to recover debts due to us)</li> </ul>	<ul style="list-style-type: none"> <li>Banks</li> </ul>	<ul style="list-style-type: none"> <li>Individual details</li> <li>Financial information</li> </ul>	<ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to recover debts due to us)</li> </ul>	<ul style="list-style-type: none"> <li>Banks</li> </ul>			
<b>POLICY ADMINISTRATION</b> General client care, including communicating with you regarding administration and requested changes to the insurance policy. Sending you updates regarding your insurance policy.	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies)</li> <li>Consent</li> </ul>		<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies)</li> </ul>				
	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>				
<b>CLAIMS PROCESSING</b> Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to assist our clients in assessing and making claims)</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Claims handlers</li> <li>Solicitors</li> <li>Loss adjustors</li> <li>Experts</li> <li>Third parties involved in the claim</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to assess the veracity and quantum of claims)</li> </ul>	<ul style="list-style-type: none"> <li>Claims handlers</li> <li>Solicitors</li> <li>Loss adjustors</li> <li>Experts</li> <li>Third parties involved in the claim</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legitimate interests (to assess the veracity and quantum of claims)</li> </ul>	<ul style="list-style-type: none"> <li>Solicitors</li> <li>Experts</li> <li>[Loss adjustors?]</li> </ul>
	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> <li>Legal Claims</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> <li>Legal claims</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> <li>Legal claims</li> </ul>	

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
<b>CLAIMS PROCESSING</b> Defending or prosecuting legal claims	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to assist in assessing and making claims)</li> </ul>	<ul style="list-style-type: none"> <li>Claims handlers</li> <li>Solicitors</li> <li>Loss adjusters</li> <li>Experts</li> <li>Third parties involved in the claim</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to defend or make claims)</li> </ul>	<ul style="list-style-type: none"> <li>Claims handlers</li> <li>Solicitors</li> <li>Loss adjusters</li> <li>Experts</li> <li>Third parties involved in the claim</li> </ul>			
	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> <li>Legal Claims</li> </ul>		<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> <li>Legal Claims</li> </ul>				
<b>CLAIMS PROCESSING</b> Investigating & prosecuting fraud	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to assist with the prevention and detection of fraud)</li> </ul>	<ul style="list-style-type: none"> <li>Solicitors</li> <li>Private Investigators</li> <li>Police</li> <li>Experts</li> <li>Third parties involved in the investigation or prosecution</li> <li>Other insurers</li> <li>Anti-fraud databases</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to assist with the prevention and detection of fraud)</li> </ul>	<ul style="list-style-type: none"> <li>Solicitors</li> <li>Private Investigators</li> <li>Police</li> <li>Experts</li> <li>Third parties involved in the investigation or prosecution</li> <li>Other insurers</li> <li>Anti-fraud databases</li> </ul>			
	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Health data</li> <li>Criminal records data</li> <li>Other sensitive data</li> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> <li>Legal claims</li> <li>Substantial Public Interest</li> </ul>		<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Health data</li> <li>Criminal records data</li> <li>Other sensitive data</li> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> <li>Legal claims</li> <li>Substantial Public Interest</li> </ul>				
<b>RENEWALS</b> Contacting you in order to renew the insurance policy	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies)</li> <li>Consent</li> </ul>		<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Perform contract</li> <li>Legitimate interests (to correspond with clients, beneficiaries and claimants in order to facilitate the placing of and claims under insurance policies)</li> </ul>				

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>				
<b>THROUGHOUT THE INSURANCE LIFECYCLE</b> <b>Transferring books of business, company sales and reorganisations</b>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> <li>Marketing data</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>Courts</li> <li>Purchaser</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>Courts</li> <li>Purchaser</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legitimate interests (to structure our business appropriately)</li> <li>Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>Courts</li> <li>Purchaser</li> </ul>
	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> <li>[Substantial Public Interest]</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Consent</li> <li>[Substantial Public Interest]</li> </ul>		<b>Personal data and special categories of personal data:</b> <ul style="list-style-type: none"> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Personal data and special categories of personal data:</b> <ul style="list-style-type: none"> <li>Consent</li> <li>[Substantial Public Interest]</li> </ul>	
<b>THROUGHOUT THE INSURANCE LIFECYCLE</b> <b>General risk modelling &amp; underwriting</b>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legitimate interests (to build risk models that allow placing of risk with appropriate insurers)</li> </ul>		<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legitimate interests (to build risk models that allow accepting of risk with appropriate premiums)</li> </ul>		<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legitimate interests (to build risk models that allow accepting of risk with appropriate premiums)</li> </ul>	
	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Credit and anti-fraud data</li> <li>Risk Details</li> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Previous claims</li> <li>Current claims</li> </ul>	<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>Consent</li> </ul>	
<b>THROUGHOUT THE INSURANCE LIFECYCLE</b> <b>Complying with our legal or regulatory obligations</b>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> <li>Marketing data</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>PRA, FCA, ICO and other regulators</li> <li>Police</li> <li>Other insurers (under court order)</li> <li>Insurance Fraud database</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Identification details</li> <li>Financial information</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>PRA, FCA, ICO and other regulators</li> <li>Police</li> <li>Other insurers (under court order)</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Individual details</li> <li>Policy information</li> </ul>	<b>Personal data:</b> <ul style="list-style-type: none"> <li>Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>PRA, FCA, ICO and other regulators</li> </ul>

PURPOSE	INTERMEDIARY			INSURER			REINSURER		
	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures	Categories of data	Legal grounds	Disclosures
	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>• Credit and anti-fraud data</li> <li>• Risk Details</li> <li>• Previous claims</li> <li>• Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>• Consent</li> <li>• Substantial Public Interest</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>• Credit and anti-fraud data</li> <li>• Risk Details</li> <li>• Previous claims</li> <li>• Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>• Consent</li> <li>• Substantial Public Interest</li> </ul>		<b>Special categories of personal data:</b> <ul style="list-style-type: none"> <li>• Previous claims</li> <li>• Current claims</li> </ul>	<b>Special categories of personal data :</b> <ul style="list-style-type: none"> <li>• Consent</li> <li>• Substantial Public Interest</li> </ul>	

## Appendix 2

List of the legal grounds we rely on:

For processing personal data and special categories of personal data	
Legal ground	Details
Performance of our contract with you	Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.
Compliance with a legal obligation	Processing is necessary for compliance with a legal obligation to which we are subject.
Protection of vital interests of you or another person	Processing is necessary in order to protect the vital interests of you or of another natural person.
In the public interest	Processing is necessary for the performance of a task carried out in the public interest.
For our legitimate business interests	Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you are a child. These legitimate interests are set out next to each purpose.
For processing special categories of personal data	
You explicit consent (optional)	You have given your explicit consent to the processing of those personal data for one or more specified purposes. You are free to withdraw your consent, by contacting our Data Protection Contact.
Your explicit consent (necessary)	You have given your explicit consent to the processing of those personal data for one or more specified purposes, where we are unable to procure, provide or administer insurance cover without this consent. You are free to withdraw your consent by contacting our Data Protection Contact. However withdrawal of this consent will impact our ability to provide insurance or pay claims. For more detail see section 5.
Protection of vital interests of you or another person, where you are unable to consent	Processing is necessary to protect the vital interests of you or of another natural person where you are physically or legally incapable of giving consent.
For legal claims	Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
In the substantial public interest	Processing is necessary for reasons of substantial public interest, on the basis of EU or UK law.
For health services	Processing is necessary for the purposes of preventive or occupational medicine, for medical diagnosis, the provision of health or social care or treatment on the basis of EU or UK law or pursuant to contract with a health professional who is under legal or professional obligations of secrecy.

# PRIVACY POLICY

## 1.1 OUR COMMITMENT TO YOU

At Carroll Insurance Group Limited (“Carroll’s,” “CIG,” “we,” “us,” “our”), we put our priority on protecting your personal information. Acknowledging the importance of your personal information, we strive to secure and carefully process the information you share with us. We are committed to maintaining the trust and confidence of all clients and visitors to our website. In particular, we want you to know that we are not in the business of selling, renting or trading email lists with other companies and businesses for marketing purposes.

In this Privacy Policy, you will find lots of detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

It is important that you read the Privacy Policy carefully and if you do not agree to the practices described in any part of the Privacy Policy, please contact us immediately to discuss your concerns.

## 1.2 PRIVACY AND COOKIE POLICY

This policy describes how Carroll Insurance Group Limited and its group of companies, (**we, us or our**) use cookies and collect (and then use) personal data obtained from you when you visit our websites or use our mobile applications.

## 1.3 INTRODUCTION

We are the data controller in respect of any personal data we collect about you.

We have appointed a data protection officer who is responsible for monitoring our data protection compliance.

## 1.4 COLLECTION OF YOUR PERSONAL DATA

We collect and process the following information about you; this is for the purposes explained in section 3.

- **Information you give us**
  - Name, email address (personal and/or work), postal address, encrypted password(s), telephone number(s), date of birth, gender, interests, preferences, and competition entry details and answers
  - Information automatically collected from you
  - When you visit or use any of our Digital Applications, we automatically collect certain information from you (the majority of which is from a server log), including:
    - geo-location data
    - operating system and browser type
    - domain name requested
    - server log details
    - browser language
    - access times
    - application version, platform and settings
    - URL of the website you visited before browsing to our websites
    - time you spent on each page visited
    - URLs of the pages you visited on our websites
    - IP address used to connect your computer or mobile device to the internet

- **Information collected from third parties**

Google analytics – collects information about how visitors use our Digital Applications.

DoubleClick (Data collection for Google Adwords) – collects information about how visitors use our Digital Applications.

Authentication information – see section 10

## 1.5 USE OF YOUR PERSONAL DATA

We may use your personal data for any or all of the following purposes:

- to provide a high level of customer service (including assisting with any of your insurances, claims and general enquiries) and to notify you of any security and data breach alerts, and technical notices (including services messages and updates to our Digital Applications and terms);
- to help operate, maintain and improve our offering and our Digital Applications;
- to communicate with you about our offers, promotions, upcoming events, reviews and other news or those of our selected partners – this may be via email, telephone, text message and/or push notification - you can change your marketing preferences (including the way in which we contact you) by contacting us;
- to facilitate profiling, segmentation and personalisation – these may be based on location, references, interests and past actions;
- to meet our legal obligations and for establishing, exercising or defending our legal rights;
- to compile reports and to help us understand and improve our Digital Applications; and
- to enable us to carry out targeted online advertising more likely to be relevant to you.

For more information about our use of cookies and other similar technologies, see section 11.

## 1.6 SHARING OF YOUR PERSONAL DATA

We sometimes need to share the personal information we process with other organisations and, where necessary or required, we may share your personal data with the following categories of third parties:

- service providers and suppliers assisting with our business activities, business associates, customers, payment services providers, hosting providers, providers of IT support, advertising platforms, providers of booking systems, providers of cloud-based software or services used by us, accounting firms and law firms;
- ombudsman, regulators, public authorities and security organisations, such as the police, HM Revenue & Customs and the Information Commissioner's Office, to the extent required by law, regulation, court order or if necessary to establish, exercise or defend our legal rights, including if we suspect fraud or attempted fraud;
- companies in the same group as us;
- current, past and prospective employers, recruitment and employment agencies, trade and employer associations and professional bodies and educators and examining bodies;
- financial organisations and advisors, credit reference agencies, debt collection and tracing agencies, and tenants;
- staff including volunteers, agents and temporary and casual workers;
- family, associates and representatives of the person whose personal data we are processing;

## 1.7 TRANSFER OF YOUR PERSONAL DATA OUTSIDE OF THE UK OR THE EUROPEAN ECONOMIC AREA

Some third parties to whom we may transfer your personal data may be located outside of the UK or the EEA. In the event of a transfer, we will seek to ensure that appropriate safeguards to protect your data are in place which could include entering into a data transfer agreement with such third parties to ensure adequate protection for your information. Examples of the types of contractual clauses we may use can be found at the following link: [http://ec.europa.eu/justice/data-protection/internationaltransfers/transfer/index\\_en.htm](http://ec.europa.eu/justice/data-protection/internationaltransfers/transfer/index_en.htm).

## 1.8 LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We will process your personal data where it is necessary:

- for the performance or entering into of a contract with you, including in order to provide our offering, process your payment and to respond to enquiries and bookings made by you;
- for compliance with our legal obligations;

- for the purpose of furthering our legitimate interests including to:
  - improve our offering and Digital Applications;
  - operate our Digital Applications efficiently and effectively;
  - carry out behavioural advertising; and
  - prevent, detect and investigate fraud or illegal activity.

We may also process your personal data on the basis of any consent given by you. This consent may be updated by contacting us.

## 1.9 PROTECTION OF YOUR PERSONAL DATA

We are committed to protecting your personal data and to keeping it safe and confidential. We will therefore ensure that appropriate technical and organisational physical, electronic and procedural safeguards are implemented to protect it. Access to your personal data will also be limited to our employees and certain third parties who process it on our behalf.

### 1.10 STORAGE OF YOUR PERSONAL DATA

Your personal data will generally be stored for up to 5 years.

We may, however, keep your personal data for longer than 5 years if we need it to fulfil our contractual obligations to you, the law requires us to maintain it for a longer period or you have not withdrawn your consent.

### 1.11 YOUR RIGHTS

You have the following rights, albeit some of them only apply under certain circumstances:

- to have a copy of the personal data we have collected about you and to send a copy of it to another data controller;
- to update or amend the personal data we have collected about you if it is inaccurate or incomplete;
- to erase, or restrict the processing of, the personal data we have collected about you;
- to object to the processing of the personal data we have collected about you, including in respect of any data processed for direct marketing purposes;
- to withdraw any consents you have provided in respect of our processing of your personal data; and
- to lodge a complaint with the Information Commissioner's Office ([www.ico.org](http://www.ico.org)).

To exercise any of these rights, please contact us.

If you want to amend your personal data or preferences, please contact us.

### 1.12 CONNECTING TO THIRD PARTY SERVICES INCLUDING SOCIAL NETWORKS

Our offering may contain links to third-party apps, services, tools and websites that are not affiliated with, controlled or managed by us (including Facebook, Instagram, LinkedIn and Twitter®) and these services and links may also include social networking features (such as the Facebook® “Like” button and widgets, “Share” buttons, and other interactive mini-programs). Additionally, you may choose to use your own social networking logins from, for example, Facebook or LinkedIn® to log into some of our services. If you choose to connect using a social networking or similar service, we may receive and store authentication information from that service to enable you to log in and other information that you may choose to share when you connect with these services. These services may collect information, such as the web pages you visited and IP addresses, and may set cookies to enable features to function properly. We are not responsible for the security or privacy of any information collected by these third parties. You should review the privacy statements or policies applicable to the third-party services you connect to, use or access as the privacy practices of these third parties will be governed by their own privacy statements. If you do not want your personal information shared with your social media account provider or other users of the social media service, please do not connect your social media account with your account for the services we provide and do not participate in social sharing.

### 1.13 COOKIES

We collect data about how you interact with our Digital Applications through the use of cookies and other similar technology.

#### What is a cookie?

Cookies are small text files containing small amounts of information which are downloaded to your computer or mobile device when you access our Digital Applications. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie.

### Why do we use cookies?

Cookies are useful because they allow our Digital Applications to recognise your device. We use them to make our Digital Applications work, or work more efficiently, as well as to store information about your preferences or past actions. You can find out more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

We also use cookies to enhance and improve your online experience (for example, by remembering your language and/or preferences) and to understand better how our Digital Applications are used. Cookies may tell us, for example, whether you have visited our Digital Applications before or whether you are a new visitor. They can also help to ensure that adverts seen online are more relevant to you and your interests. They cannot be used to identify you personally.

### What types of cookies do we use and how?

We use the following types of cookies:

- ‘session cookies’: these are allocated to your device only for the duration of your visit to our Digital Applications – they are deleted automatically once you close your browser; and
- ‘permanent cookies’: these survive after your browser is closed and can remain on your device for a period of time – they can be used by our Digital Applications to recognise your computer or mobile device when you open your browser and browse the internet again.

These cookies may be served directly by us to your computer or mobile device (so-called ‘first-party cookies’) or by one of our service providers (so-called ‘third-party cookies’). A first-party cookie is only used by us to recognise your computer or mobile device when you revisit, or access content via, our Digital Applications. Third-party cookies can be used to recognise your computer or mobile device across different websites (and are most often used for analytical and advertising purposes).

### What purposes do we use cookies for?

We use cookies for the purposes stated below:

- essential cookies: these are essential to provide you with services available through our Digital Applications and to use some of their features, such as access to secure areas – without these, providing core functionality, such as transactional pages and secure login accounts, would not be possible;
- analytics cookies: these are used to collect information about how you and others use our Digital Applications – the information gathered does not identify you and is aggregated – this includes the number of visitors to our Digital Applications, the websites or other applications that referred them to our Digital Applications and the pages that they visited on our Digital Applications – we use this information to help operate our Digital Applications more efficiently, to gather broad demographic information and to monitor the level of activity on our Digital Applications;
- functionality cookies: these allow our Digital Applications to remember choices you make (such as your user name or the region you are in) and provide enhanced, more personal features – they can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize – they may also be used to provide services you have asked for, such as watching a video or commenting on a blog – the information these cookies collect may be anonymised and they cannot track your browsing activity on other websites;
- performance cookies: these collect information about how you and others use our Digital Applications, for example, which pages are most visited, if error messages come up and how effective our online promotions are – they are only used to help us improve how our Digital Applications work and to ensure ease and speed of use;
- marketing cookies: these facilitate online advertising – our Digital Applications, for instance, use remarketing with Google – third-party vendors, including Google, use these cookies to tailor adverts based on someone's past visits to our Digital Applications and serve these across the web – you can set preferences for how Google advertises to you using the [Google Ads Settings](#); and
- social media cookies: these are used when you share information using a social media sharing button or “like” button on our Digital Applications or you link your account or engage with our content on or through a social networking site such as Facebook, Instagram, Twitter or Google+ – the social network will then record that you have done this and the information may be linked to advertising activities such as targeted banners.

### What particular cookies do we use?

The following are our own cookies; they are controlled by us and used to provide information about usage of our Digital Applications. These are all session cookies and automatically expire when you close down your browser:

- ci\_session / ASPSESSIONIDQABRARAD / fueldid / PHPSESSID: these are unique identifiers for your session;
- TextSize: this sets the text size;
- TextType: this sets the graphic version;
- js-cookie-notice: this remembers the status of your cookie banner; and
- landing\_auth: this remembers the status of your popups.

We use a number of suppliers who may also set cookies on their websites on their behalf. We do not control the use of these cookies, so you should check the third party websites for more information about them.

Provider	Name	Purpose	More info
Google	_utma	These cookies are used to collect information about how you use our Digital Applications. We use the information to compile reports and to help us improve the Digital Applications. The	<a href="#">Google</a>

Analytics	_utmb _utmz _ga _gat _gid 1P_JAR SIDCC	cookies collect information in an anonymous form, including the number of visitors to the Digital Applications, where visitors have come to the Digital Applications from and the pages they visited.	<a href="#">Privacy policy</a>
Share This	__uset __stid	Tracks what is being shared and by whom.	<a href="#">Share This privacy</a>
YouTube	VISITOR_INFO O1_LIVE APISID HSID LOGIN_INFO PREF SAPISID enabledapps. uploader	Google uses these cookies to measure the number and behaviour of Youtube users, including information that links your visits to our websites with your Google account if you are signed in to one.	<a href="#">Google Privacy policy</a>
Facebook	datr lu	Facebook Social Plugin – embedding Facebook content.	<a href="#">Facebook Privacy policy</a>
Google Maps	NNID PREF APISID HSID	Google uses these cookies to measure the number and behaviour of Google Maps users.	<a href="#">Google Privacy policy</a>
New Relic	JSESSIONID NREUM NRAGENT	Used to store a session identifier so that New Relic can monitor session counts for an application.	<a href="#">New Relic Cookies</a>
DoubleClick	test_cookie Id ide _drt_	The advertisements that drive traffic to our Digital Applications (when shown) are served by a third-party ad serving provider called DoubleClick. The cookies accompanying the ads allow monitoring of the effectiveness of the ads (for example by using statistical analysis cookies) and make the ads more relevant to you.	<a href="#">Google Advertising Info</a>
Crazy Egg	ceg adx cean	These cookies are placed by Crazy Egg, a platform that produces heatmaps that allow us to analyse how users engage with our websites.	<a href="#">More info</a>

#### How to manage cookies?

You have the right to choose whether or not to accept cookies. However, if you do not accept our cookies, you may not be able to use the full functionality of our Digital Applications.

You can find more information about how to manage and remove cookies at [allaboutcookies.org/manage-cookies/](http://allaboutcookies.org/manage-cookies/) or by visiting the websites relevant to the browser you are using. Below we have provided links to some of the most popular browser websites:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Apple Safari](#)

- [Opera](#)

#### 1.14 CONTACT INFORMATION AND UPDATING YOUR PREFERENCES

If you have any comments or questions, please contact us at 2 White Lion Court, Cornhill, London, EC3V 3NP (marked for the attention of our Data Protection Officer), via phone (020 7623 2228) or via email ([cig@carrollinsurance.co.uk](mailto:cig@carrollinsurance.co.uk)).

If at any time you wish to change how we communicate with you (including the pubs or hotels you'd like to hear from) or what we communicate with you about, please visit our preference centre. This is expected to be available in March 2018.

To unsubscribe from any of our marketing-related activities, please follow the link at the bottom of any of our e-communications. Alternatively, please contact us at [cig@carrollinsurance.co.uk](mailto:cig@carrollinsurance.co.uk) and we will process your request.

#### 1.15 CHANGES TO THIS POLICY

From time to time we may change this policy. Changes made to it will be notified to you. If you do not accept the changes within the specified timeframe (which will be no less than 30 days) we may have to cease providing you with access to our offering and/or our Digital Applications.