

1. FAIR PROCESSING NOTICE

This Fair Processing Notice is provided by Kingsbridge Risk Solutions Limited trading as Kingsbridge Insurance Brokers (referred to as "us", "our" or "we" in this statement) for the information of those people (referred to as "you" or "your" in this statement) with whom we deal with as clients, prospects or those visiting our website or providing information to us through other channels, such as by phone or e-mail. We are committed to protecting and respecting your privacy. This statement sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

You will appreciate that this policy will need to change over time so we will post changes to this page as necessary when material changes are required.

2. WHO ARE WE?

We are Kingsbridge Risk Solutions Limited trading as Kingsbridge Insurance Brokers.

Kingsbridge Risk Solutions Limited is registered in England and Wales. The company registration number is 4122238. The registered office of the company is 9 Miller Court, Tewkesbury, Gloucestershire, GL20 8DN.

Telephone: 01386 725 900

E-mail address: KIBinfo@kingsbridge.co.uk

3. FINANCIAL CONDUCT AUTHORITY

Kingsbridge Insurance Brokers is a trading style of Kingsbridge Risk Solutions Limited. Kingsbridge Risk Solutions Limited is authorised and regulated by the Financial Conduct Authority. Our FCA firm reference number is 309149.

4. THE GENERAL DATA PROTECTION REGULATION (THE "GDPR")

For the purposes of the GDPR, the controller is Kingsbridge Risk Solutions Limited. We process personal data in accordance with the United Kingdom's data protection laws, which include the GDPR and its UK implementation, the [Data Protection Act 2018].

5. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide to us either verbally or in any durable written form or by completing online forms (where applicable) on our website www.kibl.co.uk and/or any subdomains ("our site"). This includes information provided at the time of purchasing a policy or requesting further services and information. We may also ask you for information if you report a problem with our site.
- Information provided to us on any online portal we may have provided you with the use of

On all occasions this may include sensitive personal information (defined as special categories of data) such as details of criminal convictions.

We will keep a record of:

- Any correspondence between you and us including details of telephone calls which may also be recorded

- Data that has been input into Kingsbridge systems by you to enable us to provide you with insurance services
- Demographic, user behaviour and profile data collected on our website. This information may be combined with other forms of information to permit us to bring together, in aggregate and non-aggregate form, information about the people who use our website. Such information will enable us to understand, in general terms, user preferences in relation to the content of the website and the effectiveness of our advertising.

6. INFORMATION THAT IS AUTOMATICALLY LOGGED

When you enter our website, we may use your Internet Protocol ("IP") address to help diagnose problems with our server and to administer our website. We also have the ability to know what type of operating system and browser software you use and to identify the geographical location of your browser. Your IP address is also used by us to gather broad demographic information and for other purposes, such as monitoring visitor frequency. We may also employ web analytics to monitor mouse clicks and movements, scrolling activity and any text you type on our website. Such analytics services do not record any personally identifiable information. The information is stored and is used for aggregated and statistical reporting, and although the aggregated statistics may be shared with third parties, such as advertisers, the underlying data is not shared with anybody else.

7. COOKIES

Cookies are files that are transferred from the website to the hard drive of your computer. We use cookies to track your activities on our website, to enable us to improve the way the website works for you and to help us improve our communications with you, your experience on our website and to compensate partners and/or affiliates we work with for passing visitors through to our website.

The cookies that are used for tracking are set by our server, Google Analytics and Hotjar.

For detailed information on how Google Analytics uses your data and sets its cookies please visit their site <https://support.google.com/analytics/answer/6004245>.

The cookies set by Hotjar and the specific information that they collect are detailed at the following link <https://www.hotjar.com/cookies>.

The cookies that are set to enable us to improve our advertising are set by Google Adwords, Bing and Facebook. They enable us to know when our advertising is working and allow us to offer you additional products and services via ads on third party websites. The affiliate tracking cookies allow us to see if our customers have come to the site through one of our partner sites so that we can then credit them appropriately. Where applicable they then allow our affiliate partners to provide any bonus that they may provide you for making a purchase.

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including Facebook, Twitter, YouTube and LinkedIn will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

A cookie does not allow us to obtain information of a personal nature that could be used to identify you, such as your name or address. We will only be aware of such information if you provide the information to us or you have set the preferences in your browser to provide this information automatically.

You may refuse to accept cookies by activating the setting on your browser which allows you to

refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. Please note that not all these services are used on our websites but we have the discretion to use them if we see fit.

In addition, should you see targeted ads on third party websites and wish to be excluded from this targeting you may disable them by clicking on the 'Ad Choices' section of the ad and setting your preferences there.

If you are unsure of your cookie settings, we recommend visiting the website www.aboutcookies.org. This website gives you detailed step by step guidance on how to control and delete cookies depending on your browser type. You can then adjust your browser settings to your preferred level of protection.

8. WHY WE COLLECT CERTAIN INFORMATION AND WHAT WE DO WITH IT

We will hold, use and disclose your personal information for a number of legitimate business purposes, including:

- To provide you with information, products or services that you request from us
- To answer your enquiries
- To carry out our obligations arising from any contracts entered into between you and us
- To notify you about changes to our service
- Where relevant to ensure that content from our site is presented in the most effective manner for you and for your computer
- To advise you of any other suitable insurance products that we deem appropriate in our professional capacity as an insurance broker or agent
- To advise you of news and industry updates, events, promotions and competitions, reports and other information. Where we do so, you will be given an opportunity to opt-out of receiving such information when we collect your e-mail address, and also an "unsubscribe" opportunity with each such communication. Further details about this are set out in the separate section below on Marketing
- To provide further services to you by sharing your personal information with other trusted parties. Further details about this are set out in the separate section below on Disclosure of Information
- To release personal information to regulatory or law enforcement agencies, if they require us to do so. We will also disclose your personal information where we are permitted and requested to do so by law enforcement agencies

9. THE LEGAL BASIS FOR PROCESSING YOUR INFORMATION UNDER GDPR

Under GDPR, there are various grounds on which we are permitted to process your personal data. The main grounds that we rely upon are the following:

- Necessary for entering into, or performing, a contract – in order to perform obligations that we undertake in providing a service to you, or in order to take steps at your request to enter into a contract with us, it will be necessary for us to process your personal data
- Necessary for compliance with a legal obligation – we are subject to certain legal

contractual requirements which require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency

- Necessary for the purposes of legitimate interests - either we, or a third party, such as an insurer, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website and customer experience, informing you about our products and services and ensuring that our operations are conducted in the most appropriate manner
- Consent – in some circumstances, we may ask for your consent to process your personal data in a particular way. See also section 19 below

10. MARKETING

We would like to keep you up to date with relevant news, competitions and offers and will only use your data to contact you directly. You have the option to indicate whether you wish to receive such promotional communications about the services that we and our partners offer and to amend your preferences at any time by emailing KIBinfo@kingsbridge.co.uk. We will only send you marketing communications where you have opted to receive these. In relation to marketing communications and those that relate to our third-party partners' products and services, you will have the opportunity to opt-out of receiving these at the outset of your relationship with us. Each communication will enable you to easily unsubscribe from future communications.

Please note that customers who have opted not to receive marketing communications may still receive key customer services communications that are relevant to you, your business and your insurance arrangements. This may include industry updates that may affect your policy, in accordance with the terms of this statement.

We will not sell your data to any third party nor will we disclose your personal data to a third party for their own marketing purposes unless we have your specific permission.

11. HOW YOUR INFORMATION IS STORED

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our participating insurers. Such staff may be engaged in, among other things, the fulfilment of your application, the processing of your payment details and the provision of support services. Any transfers of personal data by us outside the EEA will be subject to safeguards approved under GDPR. These safeguards may vary depending on the third party accessing the data, but will include the approved Model Clauses and the EU/US Privacy Shield. We will take all steps reasonably necessary to ensure that your data are treated securely and in accordance with this privacy policy. All information you provide to us is stored on our secure servers in accordance with our company data retention policy which is available upon request. Your data are retained to manage your insurance policy and for any regulatory requirements. Any payment transactions will be encrypted using industry standard SHA256 bit encryption, commonly employed by UK banks. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

12. DISCLOSURE OF INFORMATION

In certain circumstances we will share your personal information with other parties. Details of those parties are set out below along with the reasons for sharing it.

If we have provided an insurance quote for you and/or you have purchased insurance cover, we will disclose information held about you to the insurer for the purposes of them quoting and or providing the insurance cover. Insurers are also subject to the data protection laws and upon purchase of insurance cover they become a controller in respect of your data and you are subject to their privacy policies for which we do not accept any responsibility or liability.

Where applicable we will disclose information to payment providers including Worldpay, Victory House, Fifth Avenue, Gateshead, NE110EL; Stripe Payments UK Ltd, 9th Floor, 107 Cheapside, London, EC2V 6DN and Close Brothers Premium Finance, Wimbledon Bridge House, 1 Hartfield Rd, Wimbledon, SW19 3RU who provide the credit facilities that you may utilise in relation to paying the premium for the insurance policy or payment card acquirers for the purpose of processing your payment to us. We will also disclose information to Sanctions Search of 45 Market Street, Hoylake, Wirral, CH47 2BQ who provide sanctions checking services.

We may engage a third party to assist us in relation to the site, for example, to provide us with website hosting services. If necessary for providing the services to us, we will pass your information to that third party. However, we will control and be responsible for the use of your information at all times

We share information in aggregate form with advertisers and other partners.

The information in aggregate form permits us to carry out an analysis of user behaviour in general. This allows us to measure overall interest in our site and to help us develop the site to make it more interesting in general terms. We will also be able to inform any advertisers how many users have clicked on to the various advertisements displayed on our site. The analysis we perform does not include any personal information provided by you. We merely use the aggregate form of the information for these.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or,
- If Kingsbridge Risk Solutions Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce our Terms of Business and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Our site may, from time to time, contain links to and from the websites of our partners or associations. If you follow a link to any of these websites, please note that data about you may be collected by these websites which will have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

13. YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes at any time. You can exercise your right to prevent such processing by emailing KIBinfo@kingsbridge.co.uk.

You also have the right under GDPR in certain circumstances to:

- object to our processing of your personal data where it is based on our legitimate interests;
- have your personal data erased;
- restrict our processing of your personal data even though we will still hold the data.

If you wish to exercise these rights, please email KIBinfo@kingsbridge.co.uk. Please note that there are limitations on these rights, and we may be able to refuse your request. However, we will give you reasons for doing so.

14. TELLING YOU WHAT INFORMATION WE HOLD ABOUT YOU

You have the right at any time to access information on personal data held about you. If you wish to know what personal data we hold about you, please email KIBinfo@kingsbridge.co.uk. Where we have good reason to do so, and where the GDPR permits, we can refuse your request for a copy of your personal data, or certain elements of the request. If we refuse your request or any element of it, we will give you reasons for doing so.

15. REMOVING AND CORRECTING INFORMATION

You have the right to have rectified any inaccurate personal data that we hold about you, and to complete any incomplete data. Aside from inaccuracy, if you request the removal of your personal information from our database or you wish us to amend or change the information we hold about you on our database, we will, where required, remove or amend any such information on your contacting us to request such a change. We are required to hold certain information for a number of years in relation to the contract(s) we enter into with you (including financial information that we need to keep for periods of up to six years, i.e. that relate to tax matters). This information will not be removed until we are legally or contractually allowed to do so. We will provide reasons if we are unable to comply with a request for deletion or amendment.

16. UPDATING DATA

Should any of the information change that you have previously provided to us, please contact us and we will update your records.

17. DATA PORTABILITY

In certain instances, you have the right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format.

You can ask us to transmit that information to you or directly to a third party organisation.

The above right exists only in respect of personal information that:

- (a) you have provided to us previously; and
- (b) is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent. If we are unable to fulfil a request, we will provide you with reasons why.

18. CONSENT

Where we are relying on your consent to process personal data, you have the right to withdraw your consent to our holding and processing of your personal information at any time. You can do this by emailing KIBinfo@kingsbridge.co.uk.

19. COMPLAINTS

If you are unhappy about our use of your personal information you can contact us by emailing KIBinfo@kingsbridge.co.uk. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods

Telephone: 0303 123 11113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Email: casework@ico.org.uk

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK95AF

20. CONTACT US

If you have any questions about this Fair Processing Notice please email KIBinfo@kingsbridge.co.uk.