



# Privacy Policy Notice

[www.dna-insurance.com](http://www.dna-insurance.com)

**This Privacy Notice is issued in order to provide you, whether you are a client, a partner or employee of a client or other individual about whom we control data, with information about what data we hold and process and what we do with that data.**

If you have any questions, queries or require any further information, please do not hesitate to get in touch with us. Our full contact details are below.

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**Contact us**

DNA Insurance Services Ltd  
Unit H, Chesham Close, Romford, Essex, RM7 7PJ  
Tel: 0344 5732400

## WHAT IS PERSONAL DATA

Personal data is any information that may identify a living individual.

## WHAT DATA WE HOLD

We only collect, use and store your information where we have lawful grounds and legitimate business reasons to do so.

We collect, use and store your personal information in order to fulfil requests for quotes, products and services as part of our insurance broking, claims handling and risk management business. It may also be used to verify your identity, to administer payments and to enable us to carry out anti-money laundering and other financial crime checks where required. If you pay by instalments your information may also be used to arrange credit.

The use of your data is essential for us to check your identity, to enable you to enter into an insurance contract and for the insurance to operate (in the event of a claim, for example). We may also use it keep our records up to date, to notify you about changes to our service and to help us in develop new products and services.

If you do not provide the information required we are unlikely to be able to arrange your insurance and may not be able to provide certain services to you.

We may monitor calls, emails, text messages and other communications with you. When you contact us we may keep a record of that correspondence and any information provided

to us during that or any subsequent communication.

## SPECIAL CATEGORY DATA

Special category data includes information about criminal convictions, race or ethnic origin, political or religious beliefs, health, genetic or biometric data, sex life and sexual orientation, trade union membership and philosophical beliefs of an individual.

When processing special category data, we will do so with the utmost care and process the data in strict accordance with the legal requirements.

Where necessary, the express consent of the data subject will be obtained permitting us to process such data.

## WHAT DO WE DO WITH THE DATA

All the data we hold will be processed for the purposes of providing our compliance services to our clients.

In addition, this data may be used for our own general business purposes to facilitate:

- Administration of our clients' accounts
- Billing and debt collection
- Advertising and marketing (where necessary your consent to receive marketing will be obtained)
- Management information necessary to assess how we are performing as a business and client satisfaction with our services

- Anti-money laundering, fraud prevention, anti-bribery and for the detection and prevention of financial crime
- Health and safety requirements to ensure the safety and security of our people and premises
- Disclosure of information to our own professional and legal advisors

## OUR LAWFUL BASIS FOR PROCESSING DATA

It is a requirement of the General Data Protection Regulations that data is processed only when there is a lawful basis for doing so.

DNA Insurance Services Ltd's legal basis for processing data will include one or more of the following:

- the processing of data is necessary for the performance of a contract to which you are a party or when taking steps in order to enter into a contract at your request
- processing is necessary for our compliance with our legal obligations
- processing is necessary for the purposes of pursuing our legitimate interest (including inviting the renewal of your policy, carrying out our business of providing compliance consultancy services to clients and prospective clients and pursuing our general business interest)
- the processing is necessary for the establishment, exercise or defence of legal claims

Additionally, in some circumstances we may process personal data on the basis that an individual has provided their express consent, for example, for marketing to an individual by email or SMS or for the processing of special category data.

Please note that consent provided by an individual may be withdrawn by that individual at any time by contacting us using the contact details above.

## DIRECT MARKETING

We may wish to send marketing materials to you on the basis of our legitimate interests or, where necessary, having obtained the consent of the individual concerned, provided it is permissible for us to do so by law. It is the right of individuals to opt-out of or unsubscribe from any marketing material. Full details of how this can be done will be included within each marketing communication. You may also opt-out by contacting us at the above address.

## SHARING YOUR DATA

In order to provide our services to you and comply with our legal obligations, it may be necessary for us to share the personal data we hold, insofar as we are obliged or allowed by law to do so, with third parties including the following:

- financial organisations, debt collection, credit reference and tracing agencies

- suppliers and service providers used by us in order to deliver our services to you. This may include, including document storage facilities, IT service providers such as cloud providers of software, data room providers and providers of our IT servers
- our own legal and other professional advisors
- government agencies, regulators, the police/law enforcement agencies and other authorities (including the Information Commissioner and Financial Services Ombudsmen)

### WHO YOUR DATA IS SHARED WITH

The personal data we hold will only be shared with such third parties as are necessary for the provision of our services to you and in order that we may meet all legal obligations placed upon us. In order to process your application, we may supply some of your personal information to credit reference agencies which may include TransUnion International UK Limited who are a credit reference agency providing services such as credit risk and affordability checking, fraud prevention, anti-money laundering, identity verification and tracing. TransUnion will use your personal information to provide services to us and its other clients. We use their services in order to check your identity. More information about TransUnion and the ways in which it uses and shares personal information can be found in its privacy notice at <https://www.transunion.co.uk/legal-information/bureau-privacy-notice>.

With your consent, we may also share your personal data with anyone you have authorised to deal with us on your behalf.

### SHARING YOUR DATA OUTSIDE THE UNITED KINGDOM

Data we collect may be transferred to, and stored at, a country outside of the European Economic Area (EEA). This means it might also be processed by staff operating outside of the EEA who work for one of our suppliers.

Where information is provided to a Third Party, either in or outside the EEA, we will ensure that it and any of its agents and/or suppliers take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Fair Processing Notice.

### RETENTION OF DATA

In line with the requirements of GDPR we will retain any personal data we hold for no longer than is necessary for the purpose for which it was provided unless we are required by law, unless we have another legitimate reasons to keep it for longer (for example if necessary for any legal proceedings).

The data retention period will depend on the nature of the data and the relationship with the individual involved.

In general, this will mean that data will be retained during the business relationship between Us and our client and for a period of up to two years once the relationship ceases.

## YOUR DATA PROTECTION RIGHTS

The data protection regulations and UK law seeks to protect your rights as follows:

- 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.
- The right of rectification. You may ask us to correct any inaccurate or incomplete data within one month.
- 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 products and services.
- The right to data portability. On your request, we will provide you with your personal data in a structured format.
- 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.

You may invoke any of these rights at any time by contacting us on the details given at the beginning of this Privacy Notice.

## COMPLAINTS

In addition to the rights listed above, any person about whom we hold personal data, also known as data subjects have the right to make a complaint to the Information Commissioner with regard our processing of their personal data or any breach of their rights.

Information of how you can complain can be found at [www.ico.org.uk/for-the-public/](http://www.ico.org.uk/for-the-public/)

## OUR WEBSITE & COOKIES

Cookies are small files downloaded to your computer or other devices when you view or access certain websites.

In general, a Cookie will use your IP address to identify you but will not collect further information about your identify. If you would like more information about cookies please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org) or <http://www.youronlinechoices.com/uk/>

Cookies enable us to distinguish you from other users of our website and help us to provide you with a good experience when you browse our website and allows us to improve our website. We use Cookies for the purposes of:

- understanding what brought you to our website and what pages you visited
- remembering you when you return to our website
- providing you with safe restricted access areas

If you wish to change or manage Cookies, this can be done by changing your browser settings to delete or block cookies.

However, if you chose to block all Cookies, this may result in you being unable to fully access and enjoy our website.



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