OMNYY LLP PRIVACY NOTICE

Last updated: 12 November 2018

What is the purpose of this document?

Omnyy LLP is committed to protecting the privacy and security of **your personal data**.

Omnyy LLP is a managing general agent (MGA) and we work closely with a number of insurers with the aim of providing a range of personalised quality risk management and insurance products. This notice describes how **we**, as an **intermediary**, collect and use **personal data** about **you** in the provision of our services and in the course of our business, in accordance with the Data Protection Laws. In particular this notice is designed to help **you** understand how **we** process **your personal data** through the **insurance lifecycle**. **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 also aims to give **you** information on how Omnyy LLP collects and **processes your personal data** through **your** use of this website, including any data **you** may provide through this website, for example when **you** sign up to our newsletter or fill in our contact us form. In particular, this notice, together with the Terms of Use and Cookies Notice sets out how **we** look after **your personal data** when **you** visit **our** website (regardless of where **you** visit it from) and tells **you** about **your** privacy rights and how the law protects **you**.

Omnyy is committed to protecting the privacy needs of children and encourages parents and guardians to take an active role in their children's online activities and interests. Omnyy **does not** intentionally collect information from children, and Omnyy **does not** target its website to children.

It is important that **you** read this notice, together with any other privacy notice **we** may provide on specific occasions when **we** are collecting or **processing personal data** about **you**, so that **you** are aware of how and why **we** are using such information. This privacy notice supplements the other notices and is not intended to override them.

Third Party Information Notice - The London Insurance Market Core Uses Information Notice

Insurance involves the use and disclosure of **your personal data** by various **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers**. The London Insurance Market has produced a Core Uses Information Notice (**Core Uses Information Notice**) which sets out those core necessary personal data uses and disclosures throughout the **insurance lifecycle**, and in particular sets out how other **insurance market participants process your personal data**. Our core uses and disclosures are consistent with the Core Uses Information Notice. In addition to reviewing **our** privacy notice, **we** recommend **you** review the Core Uses Information Notice. As at the time of publishing this notice the Core Uses Information Notice can be found on the London Market Group website (www.londonmarketgroup.co.uk) at:
https://www.londonmarketgroup.co.uk/gdpr
Please note that we do not control the London Market Group website and are not responsible for the Core Uses Information Notice.

Controller

Omnyy LLP is a "**data controller**". This means that **we** are responsible for deciding how **we** hold and use **personal data** about **you**. **We** are required under the Data Protection Laws to notify **you** of the information contained in this privacy notice.

Our Data Protection Manager

We have appointed a **data protection manager** to oversee compliance with and questions in relation to this privacy notice.

If **you** have any questions about this privacy notice, including any requests to exercise **your** legal rights, please contact **our Data Protection Manager** using the details set out below:

CONTACT DETAILS

Data Protection Manager
Omnyy LLP
The St Botolph Building
138 Houndsditch
London
EC3A 7AG
Email: dataprotection@omnyy.com

Changes to this privacy notice and your duty to inform us of changes

This notice may be updated from time to time. We encourage you to review this notice regularly when you visit our website to learn more about how we are using your **personal data** and safeguarding your privacy. This version is dated 12 November 2018 and historic versions can be obtained by contacting our **Data Protection Manager**.

It is important that the **personal data we** hold about **you** is accurate and current. Please keep **us** informed if **your personal data** changes during **your** relationship with **us**.

Third Party Links

Our website may, from time to time, contain links to and from third-party websites, plug-ins and applications, including without limitation websites of our partner networks and affiliates. Clicking on those links may allow third parties to collect or share data about you. Please note that these third-party websites have their own privacy notices and we do not control those websites or accept any responsibility or liability for these privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit. This notice is specific to our website.

Defined Terms

In this notice:

> **we, us** or **our** refers to Omnyy LLP, a limited liability partnership with company number OC359366 and its registered office at The St Botolph Building, 138 Houndsditch, London, EC3A 7AG, an independent insurance intermediary authorised and regulated in the United Kingdom by the Financial Conduct Authority (FCA) under Firm Reference Number 541369. Omnyy's main trading address is 9th Floor, John Stow House, 18 Bevis Marks, London, EC3A 7JB;
>
> **you** or **your**, refers to the individual whose **personal data** may be processed by **us** and other **insurance market participants** (**you** may be a potential or actual policyholder, **insured**, **beneficiary** under a policy, their family member, **claimant** or other person involved in a claim or relevant to a policy (including without limitation the broker or professional adviser)).

There are other terms in **bold** with specific meanings. Those meanings can be found in **Section 11: Glossary of Key Terms**.

Contents of this privacy notice

This notice is provided in a layered format so you can click through to the specific areas sets out below:

1 – INTRODUCTION – HOW THE INSURANCE MARKET WORKS

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10 – YOUR RIGHTS AND CONTACT DETAILS OF THE ICO

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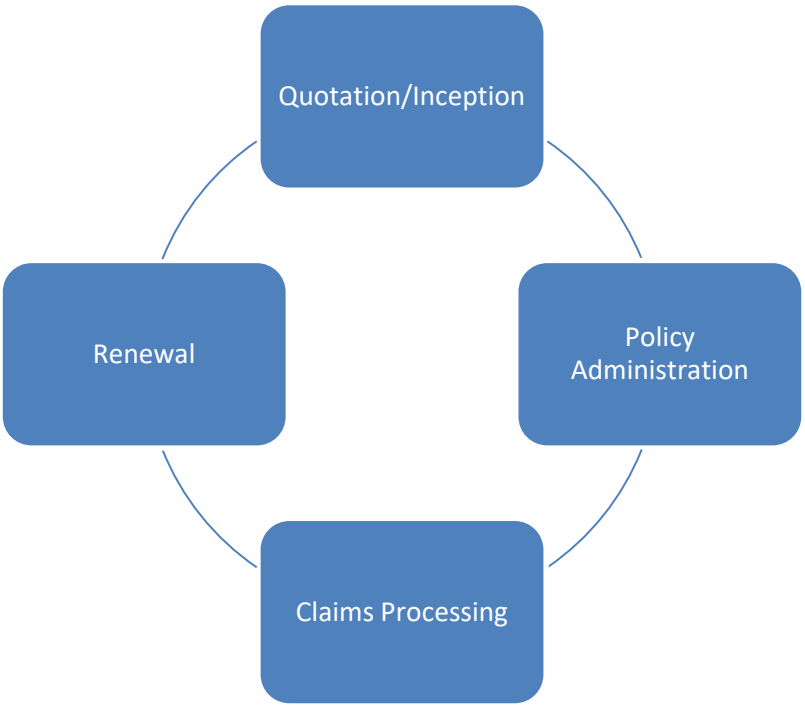
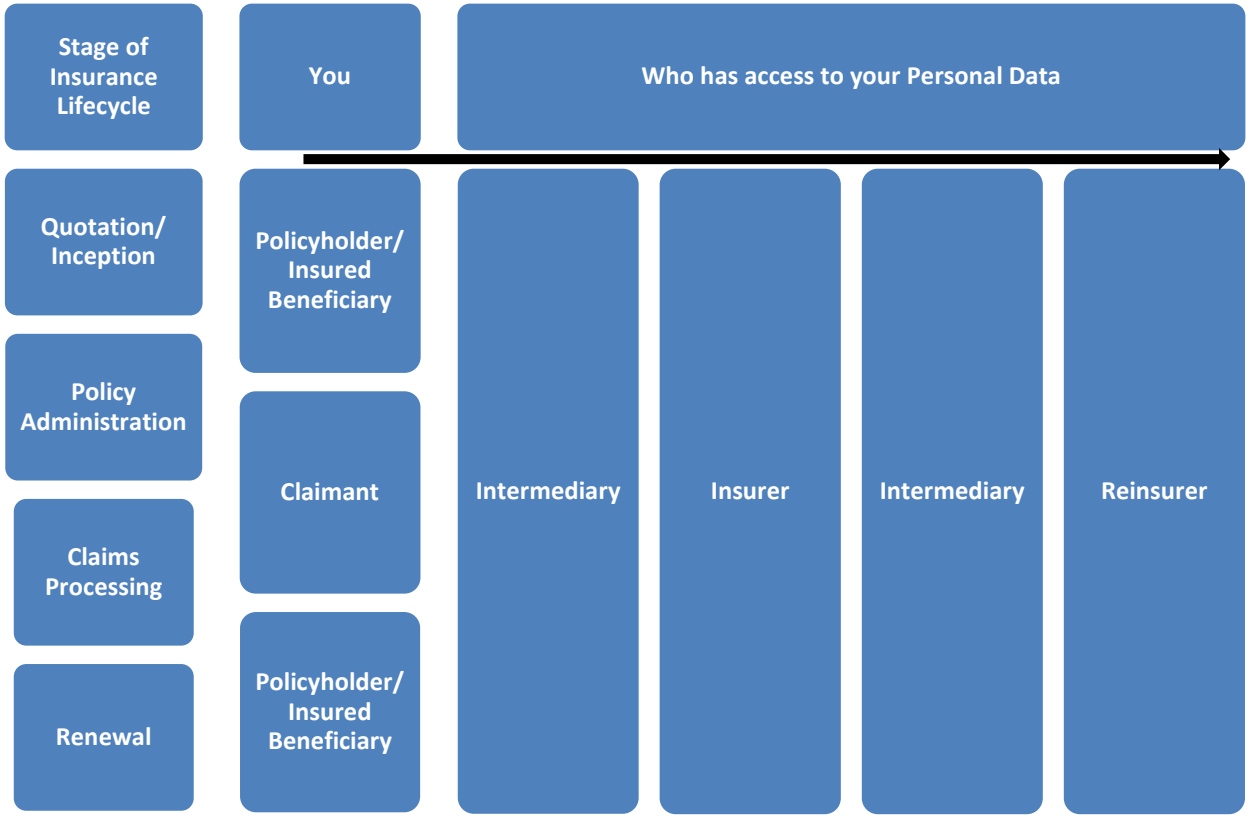
SECTION 1: INTRODUCTION – HOW THE INSURANCE MARKET WORKS

INSURANCE LIFECYCLE:



Quotation	•is the process of providing a quote to a potential insured/policyholder for an insurance policy
Inception	•is when the insurance policy starts
Policy Administration	•is the process of administering and managing an insurance policy through its inception
Claims Processing	•is the process of handling a claim that is made under an insurance policy
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

FLOWS OF PERSONAL DATA THROUGH THE INSURANCE LIFECYCLE:



SECTION 2: THE DATA WE MAY COLLECT ABOUT YOU (YOUR PERSONAL DATA)

In order for **us** to obtain insurance quotes, place and administer 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:**
Individual details ►	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 **you**
Identification details ►	Identification numbers issued by government bodies or agencies, including **your** national insurance number, passport number, tax identification number and driving licence number
Financial information ►	Bank account or payment card details, income or other financial information
Risk details ►	Information about **you** which **we** need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to **your** health, criminal convictions, or other **special categories of personal data.**

Policy information ►	Information about the quotes **you** receive and policies **you** take out
Credit and anti-fraud data ►	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies relating to **you**
Previous and current claims ►	Information about previous and current claims, (including other unrelated **insurances**),which may include data relating to **your** health, criminal convictions, or other **special categories of personal data**
Special categories of personal data►	Certain categories of **personal data** which have additional protection under the **GDPR**. The categories are health, criminal convictions, political opinions, religious or philosophical beliefs, or data concerning sex life or sexual orientation
Technical data ►	internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
Usage data ►	Information about how you use our website, products and services, including information from your visit from cookies, such as clickstream to, through and from our website (including date and time), items you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as clicks), and methods used to browse away from the page
Marketing and communications data►	Your preference in receiving marketing from us and third parties and your communication preferences

Personal data does not include data where the identity has been removed (anonymous data).

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from **your personal data** but is not considered **personal data** in law as this data does **not** directly or indirectly reveal **your** identity. However, if **we** combine or connect aggregated data with **your personal data** so that it can directly or indirectly identify **you**, **we** treat the combined data as **personal data** which will be used in accordance with this privacy notice.

If you fail to provide personal data
Where **we** need to collect **personal data** by law, or under the terms of a contract **we** have with **you**, or in order to incept a policy for **you** or **your** client**,** and **you** fail to provide that data when requested, **we** may not be able to perform the contract **we** have or are trying to enter into with **you**, or to carry out the functions **you** are asking **us** to. In this case, **we** may have to cancel a policy or service **you** have with **us** but **we** will notify **you** if this is the case at the time.

SECTION 3: WHERE WE MIGHT COLLECT YOUR PERSONAL DATA FROM

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

- **you** (for example by filling in forms or by corresponding with **us** by post, phone, email or otherwise. This includes personal data you provide when you:
    - make enquiries about or request our services;
    - subscribe to receive our newsletters or publications;
    - request marketing to be sent to you;
    - give us some feedback);

- **your** employer (including trade or professional associations of which you are a member) or representative;

- other **insurance market participants** (which may include without limitation your insurance broker);

- credit reference agencies;

- anti-fraud databases, sanctions lists, court judgements and other databases;

- Technical Data from analytics providers such as Google;

- forms on our website, and Technical Data and Usage Data about your equipment, browsing actions and patterns from your interaction with our website. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Notice for further details;

- search information providers, e.g. Individual Details from publicly available sources such as Companies House;

- claims forms;

- third parties who introduce business to us;

- 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.

For example, **we** might collect **your personal data** where:

- **you** have taken out an **insurance policy** through **us** via your third party agent, such as your insurance broker, (**you** are the **policyholder**), in which case **we** might collect **your personal data** from **you**, credit reference agencies, anti-fraud databases, sanctions lists, your agent/insurance broker etc; or

- **you** are a **claimant** or other person involved in a claim or relevant to a policy. E.g. **you** are making a claim against an **insurance policy** that a third party has taken out through **us** for **your** benefit, or **you** are making a claim against a third party's **insurance policy** that was taken out through **us**, or a third party is making a claim against an **insurance policy** that has been taken out through **us** for your benefit**,** in which case **we** might collect **your personal data** from **you**, other **insurance market participants**, witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers etc.

SECTION 4: THE PURPOSES, CATEGORIES, LEGAL GROUNDS AND RECIPIENTS, OF OUR PROCESSING OF YOUR PERSONAL DATA

We set out below the purposes for which **we** might use **your personal data:**

Purposes:	
Relationship Management ►	- To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering into a contract - To provide services to you and carry out your instructions in connection with our services - To share information with your broker and other professional advisers for the purposes of them providing services to you - To notify you about changes to our terms or privacy notice
Quotation / Inception ►	- Setting **you** up as a client (brokers and insureds), including possible fraud, sanctions, credit and anti-money laundering checks - Evaluating the risks to be covered and matching to appropriate policy/**premium**
Policy Administration ►	- Client care, including communicating with **you** and sending **you** updates - Transfer and receipt of premiums, and payments to individuals
Claims Processing ►	- Managing insurance and reinsurance claims - Defending or prosecuting legal claims - Investigation or prosecuting fraud - Payments to individuals in connection with claims
Renewals ►	- Communicating with **you**/**your** broker in order to renew the **insurance policy** - Evaluating the risks to be covered and matching to appropriate policy/**premium** - Transfer and receipt of premiums
Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period ►	- Complying with **our** legal and regulatory obligations - General risk modelling - Transferring books of business, company sales and reorganisations
Website Management ►	- To administer and protect our business and this website and for internal operations, including to keep our website safe and secure, data analysis, troubleshooting, testing, system maintenance, support, reporting and hosting of data, research, statistical and survey purposes

	- To use data analytics to improve our website, website content, products/services, marketing, customer relationships and experiences (brokers and insureds), including to ensure that content from our website is presented in the most effective manner for you and for your device
Marketing ►	- To make suggestions and recommendations to you about products or services that may be of interest to you, to provide industry insight or to invite you to events - To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you

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.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Marketing communications from us

We may use **your Individual Details and Policy Information** to form a view on what **we** think **you** may want or need, or what may be of interest to **you**. This is how **we** decide which products, services, events and industry insight may be relevant for **you**.

You will receive marketing communications from **us** if **you** have requested information from **us** (including for example where you have provided your explicit consent by way of opting-in to receiving our marketing communications in accordance with applicable law) or purchased services from **us,** or (where you are a corporate entity) where we consider the marketing material to be relevant to you and, in each case, **you** have not opted out of receiving that marketing. Such marketing communications may include risk or insurance related information or details of services, or products, or events, which **we** think, may be of interest to **you**.

Third party marketing

We will get **your** express opt-in consent before **we** share **your** personal data with any third party for marketing purposes.

Managing your Marketing Preference (including Opting out)

You can manage your marketing preferences or ask **us** or third parties to stop sending **you** marketing messages at any time by following the opt-out links on any marketing message sent to **you** or by contacting our Data Protection Manager at any time.

Where **you** opt out of receiving these marketing messages, this will not apply to personal data provided to **us** as a result of a product/service purchase, product/service experience or other transactions, and will not affect communications relating to any such matters on which we are advising you.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Notice.

CHANGE OF PURPOSE

We will only use **your personal data** for the purposes for which **we** collected it, unless we reasonably consider that **we** need to use it for another reason and that reason is compatible with the original purpose. If **you** wish to get an explanation as to how the **processing** for the new purpose is compatible with the original purpose, please contact our Data Protection Manager.

If **we** need to use **your personal data** for an unrelated purpose, **we** will notify **you** and **we** will explain the legal basis which allows **us** to do so.

Please note that **we** may **process your personal data** without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

LEGAL GROUNDS FOR PROCESSING

We will only use **your personal data** when the law allows us to. In particular, **we** will rely on the following legal grounds to use **your personal data**:

For processing personal data and special categories of personal data	
Legal ground	**Details**
Your 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 Manager**
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
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 below
For processing special categories of personal data	
Your 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 Manager**
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 Manager**. However withdrawal of this consent will impact **our** ability to place or administer insurance or assist with the payment of claims. For more detail see Section 5: 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

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the Purposes set out in the table above.

- Internal third parties: other companies in the Omnyy Group who provide IT and system administration services and undertake leadership reporting
- External third parties:
  - Service providers who provide IT and system administration services;
  - Professional advisers including lawyers, bankers, auditors and **insure**rs who provide consultancy, banking, legal, insurance and accounting services;
  - Credit reference agencies;
  - Anti-fraud and sanctions database providers;
  - Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers**;
  - Banks;

- Claims handlers;
- Solicitors;
- Auditors;
- Loss adjustors;
- Experts;
- Third parties involved in claims/investigations/prosecutions;
- Private investigators;
- Police;
- Courts;
- PRA, FCA, ICO and other regulators;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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

We have set out below, in a table format, a description of all the ways **we** plan to use **your personal data**, including the categories of **personal data** and which of the legal bases **we** rely on to do so. **We** have also identified what **our** legitimate interests are where appropriate, and the third parties with whom **we** need to share **your personal data**.

Note that **we** may **process your personal data** for more than one lawful ground depending on the specific purpose for which **we** are using **your personal data**. Please contact **our Data Protection Manager** if **you** need details about the specific legal ground **we** are relying on to **process your personal data** where more than one ground has been set out in the table below.

Purpose	Categories of Data	Legal Grounds	Disclosures
RELATIONSHIP MANAGEMENT **To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering into a contract**	**Personal Data:** - Individual details - Marketing and Communications Data	**Personal Data:** - Performance of **our** contract with **you** - Compliance with a legal obligation - For **our** legitimate business interests (to correspond with **you**)	
RELATIONSHIP MANAGEMENT **To provide services to you and carry out your instructions in connection with our services / to share**	**Personal Data:** - Individual details - Identification details - Financial information	**Personal Data:** - Performance of **our** contract with **you** - For **our** legitimate business interests (to carry out the services we are contractually	- Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers**

information with your broker and other professional advisers for the purposes of them providing services to you	- Policy information	required to provide, for the benefit of **policyholders** and **insurers**) - For legitimate business interests of a third party (to allow brokers and/or **insurers** to provide a service or policy which **you** have requested)	
	Special Categories of Personal Data: - Risk details - Previous and current claims - Credit and anti-fraud checks	**Special Categories of Personal Data:** - In the substantial public interest (insurance purpose) - Consent	
RELATIONSHIP MANAGEMENT **To notify you about changes to our terms or privacy notice**	**Personal Data:** - Individual details - Policy information	**Personal Data:** - Performance of **our** contract with **you** - Compliance with a legal obligation - For **our** legitimate business interests (to keep our records up dated)	
QUOTATION/INCEPTION **Setting you up as a client (brokers and insureds), including fraud, credit and anti-money laundering and sanctions checks**	**Personal Data:** - Individual details - Identification details - Financial information	**Personal Data:** - Performance of **our** contract with **you** - Compliance with a legal obligation - For **our** legitimate business interests (to ensure that the client is within our acceptable risk profile, to operate our business in accordance with regulatory requirements, and to comply with the terms of authority granted to us by **insurers**) - To assist with the prevention of crime and fraud	- Credit reference agencies - Anti-fraud and sanctions databases

	Special Categories of Personal Data: - Credit and anti-fraud data	**Special Categories of Personal Data:** - In the substantial public interest (insurance purpose) - Consent	
QUOTATION/INCEPTION and RENEWAL **Evaluating the risks to be covered and matching to appropriate policy/premium**	**Personal Data:** - Individual details - Identification details - Policy information	**Personal Data:** - Performance of **our** contract with **you** - For **our** legitimate business interests (to determine the likely risk profile and appropriate insurance product and **premium**, and to comply with the terms of authority granted to us by **insurers**)	- Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers**
	Special Categories of Personal Data: - Risk details - Previous claims - Credit and anti-fraud checks	**Special Categories of Personal Data:** - In the substantial public interest (insurance purpose) - Consent	
QUOTATION/INCEPTION and POLICY ADMINISTRATION and CLAIMS PROCESSING and RENEWAL **Payments to and from individuals, including collection or refunding of premiums, paying on claims, and processing other payments**	**Personal Data:** - Individual details - Financial information	**Personal Data:** - Performance of **our** contract with **you** - For **our** legitimate business interests (to recover debts due to us, ensure our clients are able to meet their financial obligations, and to carry out the services we are contractually required to provide for the benefit of **policyholders** and **insurers**)	- Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers** - Banks
POLICY ADMINISTRATION **General client care, including communication with you regarding administration and requested changes to the insurance policy. Sending**	**Personal Data:** - Individual details - Policy information	**Personal Data:** - Performance of **our** contract with **you** - For **our** legitimate business interests (to correspond with clients, **beneficiaries**	- Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers**

you updates regarding your insurance policy.		and **claimants** in order to facilitate the placing of and claims under insurance policies, and to carry out the services we are contractually required to provide for the benefit of **policyholders** and **insurers**) - For legitimate business interests of a third party (to allow brokers and/or **insurers** to provide a service or policy which **you** requested) - Compliance with a legal obligation - Consent	
	Special Categories of Personal Data: - Risk details - Previous claims - Current claims	**Special Categories of Personal Data:** - In the substantial public interest (insurance purpose) - Consent	
CLAIMS PROCESSING **Managing insurance claims including fraud, credit and anti-money laundering and sanctions checks**	**Personal Data:** - Individual details - Identification details - Financial information - Policy information	**Personal Data:** - Performance of **our** contract with **you** - For **our** legitimate business interests (to assist **our** clients in assessing and making claims and to carry out the services we are contractually required to provide for the benefit of **policyholders** and **insurers**)	- Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers** - Claims handlers - Solicitors - Loss adjustors - Experts - Third parties involved in the claim (such as health care professionals)
	Special Categories of Personal Data: - Credit and anti-fraud data - Risk details - Previous claims - Current claims	**Special Categories of Personal Data:** - Consent - For legal claims - Substantial public interest	

CLAIMS PROCESSING **Defending or prosecuting legal claims**	**Personal Data:** - Individual details - Identification details - Financial information - Policy information	**Personal Data:** - Performance of **our** contract with **you** - For **our** legitimate business interests (to assist in assessing and making claims, and to carry out the services we are contractually required to provide for the benefit of **policyholders** and **insurers**)	- Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers** - Claims handlers - Solicitors - Loss adjustors - Experts - Third parties involved in the claim (such as health care professionals)
	Special Categories of Personal Data: - Credit and anti-fraud data - Risk details - Previous claims - Current claims	**Special Categories of Personal Data:** - In the substantial public interest (insurance purpose) - Consent - For legal claims	
CLAIMS PROCESSING **Investigating and prosecuting fraud**	**Personal Data:** - Individual details - Identification details - Financial information - Policy information	**Personal Data:** - Performance of **our** contract with **you** - For **our** legitimate business interests (to assist with the prevention and detection of fraud)	- Solicitors - Private investigators - Police - Experts - Third parties involved in the investigation or prosecution - Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers** - Anti-fraud databases
	Special Categories of Personal Data: - Health data - Criminal records data - Other sensitive data - Credit and anti-fraud data - Risk details - Previous claims - Current claims	**Special Categories of Personal Data:** - In the In the substantial public interest (insurance purpose) - Consent - For legal claims	
RENEWALS **Communicating with you/your broker in order to renew the insurance policy**	**Personal Data:** - Individual details - Policy information	**Personal Data:** - Performance of **our** contract with **you** - For **our** legitimate business interests (to correspond with clients, **beneficiaries** and **claimants** in	- Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers**

		order to facilitate the placing of and claims under insurance policies, and to carry out the services we are contractually required to provide for the benefit of **policyholders** and **insurers**) - For legitimate business interests of a third party (to allow brokers and/or **insurers** to provide a service or policy which **you** requested) - Consent	
	Special Categories of Personal Data: - Risk details - Previous claims - Current claims	**Special Categories of Personal Data:** - In the substantial public interest (insurance purpose) - Consent	
THROUGHOUT THE INSURANCE LIFECYCLE **Transferring books of business, company sales and reorganisations. To administer and protect our business**	**Personal Data:** - Individual details - Identification details - Financial information - Policy information - Marketing and communications data	**Personal Data:** - For **our** legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud, and to structure our business appropriately) - Compliance with a legal obligation	- Group companies - Courts - Purchaser (potential and actual)
	Special Categories of Personal Data: - Credit and anti-fraud data - Risk details - Previous claims - Current claims	**Special Categories of Personal Data:** - Consent - In the substantial public interest	
THROUGHOUT THE INSURANCE LIFECYCLE **General risk modelling and underwriting**	**Personal Data:** - Individual details - Identification details	**Personal Data:** - For **our** legitimate business interests (to build risk models that allow placing of risk	

	- Financial information - Policy information	with appropriate **insurers**)	
	Special Categories of Personal Data: - Credit and anti-fraud data - Risk details - Previous claims - Current claims	**Special Categories of Personal Data:** - In the substantial public interest (insurance purpose) - Consent	
THROUGHOUT THE INSURANCE LIFECYCLE **Complying with our legal or regulatory obligations**	**Personal Data:** - Individual details - Identification details - Financial information - Policy information - Marketing and communications data	**Personal Data:** - Compliance with a legal obligation	- PRA, FCA, ICO and other regulators - Police - Other **insurance market participants** such as **intermediaries**, **insurers** and **reinsurers** (under court order) - Insurance Fraud database - Auditors
	Special Categories of Personal Data: - Credit and anti-fraud data - Risk details - Previous claims - Current claims	**Special Categories of Personal Data:** - Consent - For legal claims - In the substantial public interest	
WEBSITE MANAGEMENT **To administer and protect this website and for internal operations, including to keep our website safe and secure, data analysis, troubleshooting, testing, system maintenance, support, reporting and hosting of data, research, statistical and survey purposes**	**Personal Data:** - Individual Details - Technical Data - Marketing and Communications Data	**Personal Data:** - For **our** legitimate business interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of business reorganisation or group restructuring exercise) - Compliance with a legal obligation	- Internal third parties - External third party service providers who provide IT and system administration services - Purchaser - Courts - FCA, ICO and other regulators - Police - Professional advisers
WEBSITE MANAGEMENT	**Personal Data:** - Technical Data	**Personal Data:**	- External third party service

To use data analytics to improve our website, website content, products/services, marketing, customer relationships (broker and insured) and experiences, including to ensure that content from our website is presented in the most effective manner for you and for your device	- Usage Data	- For **our** legitimate business interests (to define types of customers (brokers and insureds) for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	providers who provide IT and system administration services
MARKETING **To make suggestions and recommendations to you about products, services or events that may be of interest to you and to provide industry insight**	**Personal Data:** - Individual details - Policy information - Technical Data - Usage Data - Marketing and Communications Data	**Personal Data:** - For our legitimate interests (to develop our products/services and grow our business) - Explicit consent (optional) (where required by law)	
MARKETING **To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you**	**Personal Data:** - Individual Details - Marketing and Communications Data - Technical Data - Usage Data	**Personal Data:** - For our legitimate business interests (to understand how customers (brokers and insureds) use our products and services, to develop them and grow our business, and to inform our marketing strategy)	

SECTION 5: CONSENT

In order to arrange and provide insurance cover and deal with insurance claims in certain circumstances **we** and other **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 us and the other insurance market participants to achieve this.

If you have provided your consent but want to withdraw it, you may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our, and the other insurance market participants', ability to place, administer and provide insurance or pay claims.

SECTION 6: PROFILING AND AUTOMATED 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. **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.

SECTION 7: DATA SECURITY

Unfortunately, the transmission of data over the internet or any website cannot be guaranteed to be completely secure from intrusion. However, **we** have put in place appropriate physical, electronic and procedural security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected **personal data** breach and will notify **you** and any applicable regulator of a breach where **we** are legally required to do so.

SECTION 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 or in relation to **your insurance**, or where **we** are required to keep **your personal data** due to legal, regulatory, accounting or reporting reasons.

To determine the appropriate retention period for **personal data**, we consider the amount, nature, and sensitivity of the **personal data**, the potential risk of harm from unauthorised disclosure of your **personal data**, the purposes for which we **process** your **personal data** and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your **personal data**: see **Section 10 (Your Rights and Contact Details of the ICO)** below.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

SECTION 9: INTERNATIONAL TRANSFERS

We may need to transfer **your** data to **insurance market participants**, other companies within the Omnyy group, their respective affiliates or sub-contractors, or third parties providing services to us 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 **our Data Protection Manager**.

SECTION 10: YOUR RIGHTS AND CONTACT DETAILS OF THE ICO

If **you** have any questions about this privacy notice or in relation to **our** use of **your personal data**, **you** should first contact **our Data Protection Manager**. 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 personal 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;
- object to direct marketing; 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).

If **you** wish to exercise any of the rights set out above, please contact **our** Data Protection Manager.

No fee usually required

You will not have to pay a fee to access **your personal data** (or to exercise any of the other rights). However, **we** may charge a reasonable fee if **your** request is clearly unfounded, repetitive or excessive. Alternatively, **we** may refuse to comply with **your** request in these circumstances.

What we may need from you

We may need to request specific information from **you** to help **us** confirm **your** identity and ensure **your** right to access **your personal data** (or to exercise any of **your** other rights). This is a security measure to ensure that **personal data** is not disclosed to any person who has no right to receive it. **We** may also contact **you** to ask **you** for further information in relation to **your** request to speed up **our** response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take **us** longer than a month if **your** request is particularly complex or **you** have made a number of requests. In this case, **we** will notify **you** and keep **you** updated.

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: Your Rights and Contact Details of the ICO**, or if **you** think that **we** have breached the **GDPR**, then **you** have the right to complain to the **Information Commissioner's Office (ICO)**, the UK supervisory authority for data protection issues. Please see below for contact details of the **ICO**.

We would, however, appreciate the chance to deal with **your** concerns before **you** approach the **ICO** so please contact **us** in the first instance.

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 2 HH	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: casework@ico.org.uk	Email: scotland@ico.org.uk	Email: wales@ico.org.uk	Email: ni@ico.org.uk

SECTION 11: GLOSSARY OF KEY TERMS

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.**

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 Omnyy LLP, a limited liability partnership with company number OC359366 and its registered office at The St Botolph Building, 138 Houndsditch, London, EC3A 7AG, an independent insurance intermediary authorised and regulated in the United Kingdom by the Financial Conduct Authority (FCA) under Firm Reference Number 541369. Omnyy's main trading address is 9th Floor, John Stow House, 18 Bevis Marks, London, EC3A 7JB.

You or ***your*** refers to the individual whose **personal data** may be processed by **us** and other **insurance market participants. You** may be the insured, beneficiary, **claimant** or other person involved in a claim or relevant to an **insurance policy** (including without limitation the broker or professional adviser)**.**

Key data protection terms:

Data Protection Laws means all laws and regulations relating to the Processing of Personal Data, including the GDPR, as the same may be in force from time to time.

GDPR is the EU General Data Protection Regulation and the new UK Data Protection Act 2018, which replaces the UK Data Protection Act 1998 from 25 May 2018.

Data Controller is an entity which collects and holds personal data. It decides what personal data it collects about you and how that personal data is used.

Information Commissioner's Office (ICO) is the regulator (or National Competent Authority/Data Protection Authority) for data protection matters in the UK.

Personal Data is any data from **you** which can be identified and which relates to **you**. It may include data about any claims **you** make.

Processing of personal data includes collecting, using, storing, disclosing or erasing your personal data.