# Privacy and Cookies Policy

Compass Broker Networks Ltd (CBN) and Compass London Markets Ltd (CLM) are committed to protecting and respecting your privacy.

This policy sets out the basis on which we will process any personal data we collect from you or that you provide to us.

By using our website, you indicate that you accept our website terms of use (set out in the Legal & Regulatory Information), and that you agree to abide by them. If you do not agree to these terms of use, please refrain from using our site.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Any personal data you supply to us will be treated in accordance with the Data Protection Act 1998 (the "Act") and any other legislation intended to protect your personal information and privacy.

For the purposes of the Act, the Data Controller in relation to any personal data you supply to us is CBN and CLM.

## 1. INFORMATION WE MAY COLLECT FROM YOU

- 1.1 We may collect and process the following data about you:
- (a) Personal data, including sensitive personal data (such as information relating to health or criminal convictions), that you provide to us by filling in forms, via our website or over the phone. We may also ask you for personal data if you report a problem with the site.
- (b) If you contact us, we may keep a record of that correspondence. Monitoring or recording of your calls, emails and other communications may take place in accordance with UK law, and in particular for business purposes such as for quality control and training, processing necessary for entering or performing a contract; to prevent unauthorised use of our telecommunication systems and websites; to ensure effective systems operation; to meet any legal obligation; in your vital interests; in order to prevent or detect crime; and for the purposes of the legitimate interests of the data controller. Please visit the following website for further information: ico.gov.uk

## 2. IP ADDRESSES AND COOKIES

- 2.1 We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
- 2.2 For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:
- (a) To estimate our audience size and usage pattern.
- (b) To store information about your preferences, and so allow us to customise our site according to your individual interests.
- (c) To speed up your searches.
- (d) To recognise you when you return to our site.
- 2.3 You may refuse to accept cookies by activating the setting on your browser which may allow 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.

#### 3. WHERE WE STORE YOUR PERSONAL DATA

- 3.1 The personal 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 suppliers. Such staff maybe engaged in, among other things the provision of support services. Where we transfer your personal data outside of the EEA, will take all steps reasonably necessary to ensure that it is treated securely and in accordance with this privacy policy.
- 3.2 If applicable, where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 3.3 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 our website; 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.

## 4. USES MADE OF YOUR PERSONAL DATA

- 4.1 We may use the personal data we hold about you in the following ways:
- (a) for the purposes of providing insurance, handling claims and any other related purposes.
- (b) for offering renewal, research or statistical purposes.
- (c) to ensure that content from our site is presented in the most effective manner for you and for your computer.
- (d) to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- (e) if applicable, to allow you to participate in interactive features of our service, when you choose to do so.
- (f) to notify you about changes to our service.
- (g) to safe-guard against fraud and money laundering.

## 5. DISCLOSURE OF YOUR PERSONAL DATA

- 5.1 We may disclose your personal data to third parties involved in providing products or services to us, or to service providers who perform services on our behalf. These include:
- (a) our group companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- (b) affinity partners.
- (c) reinsurers.
- (d) other insurance intermediaries.
- (e) insurance reference bureaus.
- (f) credit agencies.
- (g) medical service providers.
- (h) fraud detection agencies.
- (i) loss adjusters.
- (j) solicitors/barristers.
- (k) accountants.
- (I) regulatory authorities; and
- (m) as may be required by law

## 5.2 We may also disclose your personal information:

- (a) 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.
- (b) if any CBN and CLM company 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.

(c) in order to enforce or apply our terms of use set out in the Legal and Regulatory Information document and other agreements; or to protect the rights, property, or safety of CBN and CLM our customers, or others.

## 6. YOUR RIGHTS

- 6.1 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.
- 6.2 Our site may, from time to time, contain links to and from the websites of other companies in the CBN group, our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites 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.

#### 7. ACCESS TO INFORMATION

7.1 You have the right to access any personal information we hold about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## 7.2 For access to your personal data please write to:

The Data Protection Officer, Compass Broker Networks Ltd, The Walbrook, 25 Walbrook, London, EC4N 8AW

## 8. CHANGES TO OUR PRIVACY POLICY

- 8.1 We may revise the privacy policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make, as they are binding on you.
- 8.2 If you have any questions concerning our use of your personal data, or you would like us to check, amend or update the personal data we hold about you, please contact us..