

# Data Protection & Privacy Statement

**Matrix Underwriting management Ltd** ("Matrix", "we", "us") is committed to protecting the privacy and security of those with whom we interact.

We recognise the need to respect and protect information that is collected or disclosed to us (called "Personal Information" explained below).

This notice is intended to tell you how we use your Personal Information and describes how we collect and use your Personal Information during and after your relationship with us, in accordance with applicable Data Protection Laws.

## **WHO WE ARE**

Matrix is a Underwriting agency operating on behalf of a number of Insurers.

Matrix is committed to handling data fairly and lawfully and takes its data protection obligations seriously. Matrix ensures that it processes Personal Information in compliance with applicable data protection laws, including, without limitation, the General Data Protection Regulation 2016/679 ("GDPR")

## **WHAT IS PERSONAL INFORMATION AND WHAT PERSONAL INFORMATION DOES Matrix COLLECT ABOUT YOU?**

### **What is Personal Information?**

For the purposes of this Data Protection Notice "Personal Information" consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, photographs, location data, an online identifier (e.g. cookies identifiers and your IP address) or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity. When we combine other information (i.e. information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

### **What Personal Information does Matrix collect?**

We collect and process information about you in order to arrange insurance policies and to process claims. Your information is also used for business purposes such as fraud prevention and detection and financial management. This may involve sharing your information with third parties such as insurers, brokers, insurance intermediaries such as Managing General Agents, reinsurers, claims handlers, loss adjusters, credit reference agencies, service providers, professional advisors, our regulators, police and government agencies or fraud prevention agencies].

### **The Personal Information we collect may include as follows:**

- ▶ Name
- ▶ Information about your job including job title, business description, and professional certifications
- ▶ gender,
- ▶ date of birth,
- ▶ Contact details including address, telephone number and email address
- ▶ relationship to the customer (where are you not the prospective policyholder),
- ▶ Risk Information
- ▶ Information relating to the advice that you request or the services that we are providing. For example, we might need information relating to your previous insurance policies and claims history in order to advise on your future needs

- ▶ Details of Bankruptcies, CCJ's. IVA's etc
- ▶ Financial information such as your financial history and needs, income, bank details, payment details and information obtained as a result of a credit check
- ▶ Payment information and reasons for cancellation
- ▶ Information obtained through our use of cookies.
- ▶ Information captured during recordings of or notes taken during telephone calls
- ▶ Queries and complaints

We may also obtain Special Category Personal Data (as defined in the GDPR)

- ▶ Information obtained when we carry out checks of sanction lists
- ▶ Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information as a result of carrying out checks of sanctions lists

## **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We will obtain your personal information directly from you or from someone else on your behalf in a number of ways including:

- ▶ where it is submitted in application forms, initial disclosure documents and more generally during any forms of communication such as email and telephone
- ▶ from other third parties who might introduce customers to us such as another broker and insurers
- ▶ via publically available sources such as internet search engines and social media sites
- ▶ from credit reference agencies or Company Searches
- ▶ via insurance industry fraud prevention and detection databases and sanctions screening tools
- ▶ from government agencies such as the DVLA or HMRC and from professional regulators

## **HOW DO WE USE YOUR INFORMATION?**

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- ▶ We need to use your personal information to enter into or perform our contract with you, for example, in order to fulfil our obligations under our contract and place appropriate insurance cover, we need to use your personal information to provide you with a quote and determine market placement.
- ▶ We have a genuine business need to use your personal information such as maintaining our business records and keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- ▶ We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- ▶ It is necessary for an insurance purpose and it is in the substantial public interest.

This will apply where we are advising or arranging an insurance policy, assisting with any claims under a policy, and undertaking any activities to prevent and detect fraud.

- ▶ Where the use of your special categories of information is necessary to establish, exercise or defend our legal rights, for example legal proceedings are being brought against us or we want to bring a legal claim ourselves.

## **TO WHOM DO WE DISCLOSE YOUR INFORMATION?**

From time to time, we may share your personal information with the following third parties for the purposes set out above:

- ▶ our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- ▶ other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- ▶ other third parties who assist in the administration of insurance policies such as accountants, auditors, lawyers and other experts
- ▶ fraud detection agencies and other third parties who operate and maintain fraud detection registers
- ▶ our regulators
- ▶ the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- ▶ other insurers who provide our own insurance
- ▶ industry bodies
- ▶ debt collection agencies
- ▶ credit reference agencies
- ▶ our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- ▶ selected third parties in connection with the sale, transfer or disposal of our business

We never sell any of your Personal Information to third parties.

## **WHAT DO WE DO TO KEEP YOUR INFORMATION SECURE?**

We have put in place appropriate physical and technical measures to safeguard the Personal Information we collect in connection with our services. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality. However, please note that although we take appropriate steps to protect your Personal Information, no website, product, device, online application or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

## **INTERNATIONAL TRANSFER OF DATA**

The Personal Information that we collect from you may be stored and processed in your region, or transferred to, stored at or otherwise processed outside the European Economic Area ("EEA"), or in any other country where Matrix or Matrix Affiliates, subsidiaries or service providers maintain facilities.

By using or participating in any service and/or providing us with your Personal Information, you acknowledge that we may collect, transfer, store and process your information outside of the EEA. We will take all steps reasonably necessary to ensure that your Personal Information is kept secure and treated in accordance with this Data Protection Notice and the requirements of applicable law wherever the data is located. Where we transfer your

Personal Information outside the EEA to other countries, we will ensure that appropriate transfer agreements and mechanisms (such as the EU Model Clauses) are in place to help ensure that our third-party service providers provide an adequate level of protection to your Personal Information. We will only transfer your Personal Information outside the EEA in accordance with applicable laws.

## HOW LONG WE WILL STORE/KEEP YOUR PERSONAL INFORMATION

Matrix retains Personal Information for as long as necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this Data Protection and Privacy Statement unless a longer retention period is required by law. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

## ACCESSING YOUR PERSONAL INFORMATION AND OTHER RIGHTS YOU HAVE

Matrix will collect, store and process your Personal Information in accordance with your rights under any applicable Data Protection Laws. Under certain circumstances, you have the following rights in relation to your Personal Information:

- ▶ **Subject Access** - you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.
- ▶ **Right to Withdraw Consent** – where our use of your Personal Information is based upon your consent, you have the right to withdraw such consent at any time.
- ▶ **Data Portability** – you may, in certain circumstances, request us to port (i.e. transmit) your Personal Information directly to another organisation.
- ▶ **Rectification** – we want to ensure that the Personal Information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, we will rectify or update any incorrect or inaccurate Personal Information about you.
- ▶ **Erasure ('right to be forgotten')** - you have the right to have your Personal Information 'erased' in certain specified situations.
- ▶ **Restriction of processing** – you have the right in certain specified situations to require us to stop processing your Personal Information and to only store such Personal Information.
- ▶ **Object to processing** – You have the right to object to specific types of processing of your Personal Information, such as, where we are processing your Personal Information for the purposes of direct marketing.
- ▶ **Prevent automated decision-taking** – in certain circumstances, you have the right not to be subject to decisions being taken solely on the basis of automated processing.

## ENFORCING YOUR RIGHTS

If you wish to enforce any of your rights under applicable Data Protection Laws, then please contact us.

We will respond to your request without undue delay and no later than one month from receipt of any such request, unless a longer period is permitted by applicable Data Protection Laws, and we may charge a reasonable fee for dealing with your request which we will notify to you. Please note that we will only charge a fee where we are permitted to do so by applicable Data Protection Laws.

## **COMPLAINTS**

If you are concerned that we have not complied with your legal rights under applicable Data Protection Laws, you may contact the Information Commissioner's Office ([ico.org.uk](http://ico.org.uk)) which is the data protection regulator in the UK which is where Matrix is located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

## **THIRD-PARTY LINKS AND PRODUCTS ON OUR SERVICES**

Our websites, applications and products may contain links to other third-party websites that are not operated by Matrix, and our websites may contain applications that you can download from third parties. These linked sites and applications are not under Matrix's control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third-party websites or applications, any Personal Information collected by the third party's website or application will be controlled by the Data Protection Notice of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Information.

## **COOKIES**

What are cookies?

Matrix as well as certain other third parties that provide content, advertising, or other functionality on our Services, may use cookies and other technologies, including web beacons, action tags, pixel tags. Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. Cookies are assigned to and stored in a user's internet browser on a temporary (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, product usage, content viewed, and registration information which allows for Matrix to provide users an enhanced and customised experience when engaging with our Products. We may use cookies to store your preferences and settings, help you with signing in, provide targeted ads, and analyse site operations.

For further information on cookies please contact us.

## **DATA PROTECTION OFFICER**

The Matrix has appointed Stephen Haynes F.C.I.I. as its Data Protection Officer to ensure continued compliance with Data Protection Laws.

## **CHANGES TO THIS DATA PROTECTION NOTICE**

It is also important that you check back often for updates to the Data Protection and Privacy Statement, as we may change this Data Protection and Privacy Statement from time to time. The "Date last updated" legend at the bottom of this page states when the Data Protection and Privacy Statement was last updated and any changes will become effective upon our posting of the revised Data Protection and Privacy Statement.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by email or by posting a notice of the changes on our website.

## **CONTACT US / FURTHER INFORMATION**

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