

## **PRIVACY POLICY**

**Data Controller and Data Processor Noircat Ltd trading as The Quest Partnership is strongly committed to keeping your personal information confidential, private and secure.**

**In the majority of our work, The Quest Partnership acts on behalf of an insurance company, a firm of solicitors or a private company. If you are in any way uncertain, we will be happy to help you identify the party that controls your data.**

**We are committed to protecting the privacy of Personal Data that we collect and process in the conduct of our business. "Personal Data" is information that identifies you or other individuals (eg your dependants). This Privacy Policy illustrates how we will handle Personal Data that we collect through:**

**The claims handling process:**

**Claim forms, accident report forms, e-mails, telephone calls, text messages and any other communications with us. Also from our claim investigators, medical experts, witnesses or other third parties involved in the course of our business dealings with yourself.**

**We promise to collect and process your Personal Data in accordance with this Privacy Policy and the General Data Protection Regulation 2016/679 (GDPR).**

### **Company Information**

**For the purpose of UK data protection laws, the data controller and data processor is Noircat Ltd trading as The Quest Partnership, Suite 1991, 74 Church Road, Maidstone, Kent ME15 6QY.**

### **Who to contact about your Personal Data.**

**If you have any queries regarding our use of your Personal Data, kindly contact our CEO, Mr Peter Mann F.C.I.I. A.C.I. A.r.b. M.I.Mgt A.M.I.M.C.**

### **The Quest Partnership's data protection principles**

**When processing your information, we will comply with six enforceable principles of good practice. These provide that your personal information must be:**

- **processed lawfully, fairly and in a transparent manner.**
- **processed for specified, explicit and legitimate purposes.**
- **adequate, relevant and limited to what is necessary.**
- **accurate and, where necessary, kept up to date.**
- **kept for no longer than is necessary, and;**
- **processed in a manner that ensures appropriate security.**

### **Why we need your personal data**

**We need your information and that of others you named on your insurance policy, accident report form, incident report form, instructions to your solicitor and/or any other representative you instructed and/or was instructed on your behalf. Your information comprises all of the details provided by one of the above, details that we collect directly from you and this includes any information that we may obtain about you from third parties. We will only collect the information that we need for a legitimate interest so that we can provide a high standard of service.**

### **What personal information will we process?**

**We may collect and process the following information (Personal Data)**

- **Individual details: Name, address (and proof of address), place and date of birth, National Insurance number, passport number, driving licence number, other contact details (e.g. email and telephone details), gender, marital status, family details, video, photographs and other images, professional licenses and affiliations, professional and financial information and history, educational background, physical attributes, activity, employer, job title and employment history, relationship to the policyholder, insured, beneficiary or claimant.**
- **Identification details: Driver's license number.**
- **Financial information: in certain circumstances your Bank account number and account details, credit history and credit score.**
- **Criminal records data: Criminal convictions, including any driving offences.**

- **Policy information:** the information about the quotes that individuals receive and the policies that they obtain.
- **Credit and anti-fraud data:** Credit history, information about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies.
- **Information to investigate crime, including money laundering.** For example, insurance companies commonly share information about their previous dealings with policyholders and claimants for this purpose.
- **Previous claims:** Information about previous claims, which may include health data, criminal records data, and other Special Categories of Personal Data.
- **Current claims:** Information about current claims, which in some circumstances may include health data, criminal records data, and other Special Categories of Personal Data.

#### **Special Categories of Personal Data.**

**Health data:** Current or former physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g. smoking or consumption of alcohol), prescription information, medical history.

**Racial or ethnic origin.**

#### **How we use your Personal data**

**We will use this Personal Data to:**

**Communicate with you and other interested parties to effectively manage a claim.**

**Make decisions about claim assessment, processing and settlement.**

**Provide improved quality, training and security.**

**Investigate, prevent, detect crime, including fraud and money laundering.**

**Resolve any complaints and handle requests for data access or correction.**

**We will need to retain your Personal Data for the period that is necessary to fulfil the purposes of handling a claim.**

### **How we collect personal information**

We may obtain personal information by directly interacting with you, such as:

- Claim application this may be via instructions to handle insurance claims from our clients.
- Corresponding with us by phone, text messages, email, letters or otherwise.
- Meeting with you.

We may also obtain personal information about you from third parties or other available sources such as:

- The other party to the claim (claimant/defendant), witnesses, experts (including medical experts), loss adjustors, lawyers and claims handlers.
- Other insurance market participants, such as Insurers, Reinsurers and other Intermediaries.
- Credit reference agencies.
- Anti-fraud databases and other third party databases, including sanctions lists.
- Government agencies, such as vehicle registration authorities and tax authorities.
- By conducting searches of publicly available databases or social media sites, such as Companies House, Facebook, Twitter, LinkedIn.

### **How we will use your information and who we will share it with**

We will only use your personal information when the law allows us to. We will only use your personal information for legitimate business interests namely in the handling of a claim and/or incident.

As part of our claims handling, your Personal Data may be shared with others:

Your insurers service providers.

**Our service providers.**

**Any regulatory party to comply with legal duties and requirements.**

**Other parties such as the emergency services, our bank where we operate fund payment arrangements on behalf of your insurer, any fraud prevention database which is supported and/or regulated by insurers or the FCA. For example the Personal Data in accordance with all applicable data protection laws and regulations.**

### **Personal Data – reporting**

**To protect your data we take all appropriate, reasonable, technical and legal measures. If you have any concerns that your communications with us or the data that we have retained is no longer secure or correct, kindly contact us immediately.**

### **Special Category Information**

**We will only use ‘special category’ information if;**

- **We have your explicit consent.**
- **Where it is necessary for our or a third party’s legitimate interests, and your interests and rights do not override those interest, or**
- **Where we need to comply with a legal or regulatory obligation.**

### **Dealing with other people**

**We are willing to deal with your spouse or partner who telephones us on your behalf, provided they are named on your policy. If you wish to instruct someone else to deal with your claim on your behalf on a regular basis, please advise accordingly. In exceptional circumstances, we may also deal with other people who telephone on your behalf, providing you have given your consent beforehand. If at any stage, you would prefer us to deal only with you, please inform us accordingly.**

### **Fraud Prevention and Anti – Money Laundering**

**Please take time to read the following as it contains important information relating to the details you have given or should give to us. You should show this notice to anyone whose data has been supplied to us in connection with your claim.**

**To prevent and detect fraud we may at any time:**

**Share information with other organisations and public bodies including the police although we only do so in compliance with Data Protection law.**

**Check and/or file details with fraud prevention agencies and databases and if we are given false or inaccurate information and we identify fraud, we will record this. We and other organisations may also use and search these agencies and databases from the UK and other countries to:**

- **Check your identity to prevent money laundering, unless you provide us with other satisfactory proof of identity**

**Law enforcement agencies may access and use this information.**

**We and other organisations may also access and use this information to prevent fraud and money laundering, for example when:**

- **Checking insurance claims.**

### **Marketing**

**We will only market to you with your consent or because we have a legitimate interest to do so. You may object to this at any time. We will not use your information for any marketing purposes other than for our adjusting services.**

### **What if you cannot or will not provide us with your personal information**

**If you do not want to provide us with your personal information when requested, we will not be able to continue with your claim.**

### **Disclosure of your information**

**We may share personal information with the parties set out below:**

- **On some claims your information will be provided to the Insurer who holds the relevant policy.**

- **Professional advisors and business networks with which we are connected.**
- **Our outsourced IT services provider, Sovereign Business Equipment Ltd together with providers of Wi-Fi, IT and system administration services to our business.**
- **Credit reference and fraud prevention agencies.**
- **The Information Commissioners Office, solicitors, National Crime agency, the Serious Fraud office and any other regulators and authorities who require reporting of processing activities in certain circumstances.**
- **Business partners, suppliers and sub contractors to the extent we consider it reasonably necessary for us to perform claim handling.**
- **Third parties to whom we chose 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 information in the same way as set out in this policy.**
- **We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.**

### **Where we store your personal information**

**All information you provide to us is stored on our secure servers in the United Kingdom, or on secure cloud based services in a country within the European Economic Area.**

**We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:**

**Secure lockable desks and cupboards – Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.**

**Methods of disposal – Paper documents are disposed of by shredding in a manner that ensures confidentiality.**

**Equipment – Our internal policies require that users lock or log-off from their computer when it is unattended.**

**Firewalls and encryption – We apply industry-standard firewall protection and encryption technology.**

**Training – We ensure our employees are trained in the importance of data security.**

**Electronic access – All data stored electronically is password-protected. Where we have provided an authorised user with a password, that user is responsible for keeping this password confidential and is not permitted to share the password with anyone.**

**Overseas transfers – Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Economic Area, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission.**

### **How long we will store your personal information**

**The length of time that we store your data will depend on the ‘legal basis’ for why we are using that data, as follows:**

<b>Legal basis</b>	<b>Length of time</b>
<b>Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject</b>	<b>We will use/store your data for as long as it is necessary for us to comply with our legal obligations</b>
<b>Where we use/store your data because it is necessary for our legitimate business interests</b>	<b>We will use/store your data for as long as it is necessary for our legitimate business interests, or such earlier time as you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data is more important than your interests, rights and freedoms, then we will be allowed to continue to use/store your data for as long as</b>

	it is necessary for our legitimate business interests

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

**Your rights**

You have various legal rights in relation to the information you give us, or which we collect about you as follows:

You have a right to access the information we hold about you free of charge, together with various information about why and how we are using your information, to whom we have disclosed that information, from where we originally obtained the information and for how long we will use your information.

You have the right to ask us to rectify any information we hold about you that is inaccurate or incomplete.

You have the right to ask us to erase the information we hold about you (the right to be forgotten). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.

You have the right to ask us to stop using your information where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.

You have the right to ask us to transmit the information we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.

Where we use/store your information because it is necessary for our legitimate business interests, you have the right to object to us using/storing your information.

**We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which is more important than your interests, rights and freedoms.**

**If you wish to exercise any of your legal rights, please contact our CEO, Mr Peter Mann by writing to the address at the top of this policy, or by emailing us at [peter.mann@thequestpartnership.co.uk](mailto:peter.mann@thequestpartnership.co.uk).**

**You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office, if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.**

### **Automated decision - making**

**We do not use automated decision-making processes.**

### **Third party links**

**Our website does not currently include any links to third party websites.**

### **Changes to our website**

**Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email or via social media. Please check our website frequently to see any updates or changes to our policy.**

### **Cookies**

**We do not currently use cookies on our website.**

### **Contact**

**Questions, comments and requests regarding this policy are welcomed and should be addressed to our CEO, Mr Peter Mann by writing to the address at the top of this policy, or by emailing us at [peter.mann@thequestpartnership.co.uk](mailto:peter.mann@thequestpartnership.co.uk).**

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