



## Direct Commercial Limited Privacy Policy

This Privacy Policy is designed to help you to understand how we process your personal data. If you are a customer of Direct Commercial Limited you may have purchased your insurance through an intermediary, e.g. through an insurance broker.

The insurance lifecycle may involve the sharing of your personal data with other insurance market participants, some of which, you may not have direct contact with. You can find out more information about these processors by contacting the intermediary that you purchased your policy from.

Direct Commercial Limited is not the Insurer of your policy. Please refer to your policy document or Certificate of Insurance for the name of your Insurer.

Direct Commercial Limited is a Data Controller; we determine what personal data is processed and the manner in which any personal data is, or to be, processed.

Each Insurer we work on behalf of is also a Data Controller and they will also have access to personal data, how they handle this data is contained within their own Information Notice/Privacy Policy which can be found here;

Carraig Insurance Company Limited: [www.carraiginsurance.com/privacy](http://www.carraiginsurance.com/privacy)

The Data Protection Officer for Direct Commercial Ltd is:

Liam Guilfoyle  
Direct Commercial Limited  
Redwing House  
Colchester Road  
Chelmsford  
Essex

Tel: 01245 459700

Email: [dpo@directcommercial.co.uk](mailto:dpo@directcommercial.co.uk)

Please contact the Data Protection Officer if you have questions concerning this Privacy Policy or your Data Subject Access Rights. These include:

- Data Portability: The transfer of your personal data to another Data Controller.
- Erasure: To have your personal data removed or deleted.
- Rectification: To have your personal data corrected if it is inaccurate.
- Restrict Processing: To restrict processing where your personal data is inaccurate or the processing is unlawful.
- Subject Access Request: To access your personal data and information around its processing.
- To object to direct marketing (we do not do direct marketing).

If you are unhappy with any response, or have a complaint you can raise this with:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: +44 (0) 303 123 1113

## What information do we collect about you?

### Personal Data

Categories of Data	Type Of Information Processed	Where The Data May Come From	Who We May Disclose The Data To	Potential Purpose Of Processing	Lawful Basis Of Processing
Individual Information	Name, address, marital status, date and place of birth, nationality, employer, job title, employment history, family details and their relationship to you.	Insurance intermediaries or other insurance market participants. Your family. Your employer. Credit reference agencies.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists	Setting you up as a client including checks for potential fraud, sanctions, credit and anti-money laundering.  Underwriting, evaluating and pricing of the risks to be insured and calculating and validating the appropriate premium for your policy.	Performance of our contract with you.
Policy Information	Information about the quotes and insurance policies you have applied for or taken out.	Insurance intermediaries or other insurance market participants. Your family. Your employer.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases.	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you.
Financial Information	Premiums and claims paid on your policies. Bank account or payment card details. Income and other financial information.	Insurance intermediaries or other insurance market participants. Your family. Your employer. Credit reference agencies.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Credit reference agencies. Anti-fraud databases.	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you.
Statutory and Anti-fraud information	Sanctions and information from anti-fraud databases concerning you.	Insurance intermediaries or other insurance market participants. Member of your family. Your employer. Anti-fraud	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud	Setting you up as a client including checks for possible fraud, sanctions, credit and anti-money laundering. Managing you as a client including underwriting, evaluating and	Performance of our contract with you. Compliance with a legal obligation. Processing is necessary for the defence of legal

Categories of Data	Type Of Information Processed	Where The Data May Come From	Who We May Disclose The Data To	Potential Purpose Of Processing	Lawful Basis Of Processing
		databases, sanctions lists, court judgements and other government agencies.	databases.	pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	claims.
Claim Information	Information about previous and current claims.	Insurance intermediaries or other insurance market participants. Member of your family. Your employer. Anti-fraud databases, claimants, defendants, witnesses, experts incl. medical experts, loss adjustors, solicitors and claims handlers.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists.	Managing insurance and reinsurance claims. Defending or prosecuting legal claims. Investigating or prosecuting fraud.	Performance of our contract with you. Compliance with a legal obligation. Processing is necessary for the defence of legal claims.

## Special Categories of Data

Categories Of Data	Type Of Information Processed	Source Of The Data	Who We Disclose The Data To	Purpose Of Processing	Lawful Basis Of Processing
Individual Information	Gender and health information. Medical reports. Criminal records and convictions.	Insurance intermediaries or other insurance market participants. Member of your family. Your employer.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists.	Setting you up or managing you as a client. Evaluating and pricing the risks to be insured and calculating and validating any appropriate premium where there is health or life insurance.	Performance of the insurance contract with you or consent. Processing is necessary for the defence of legal claims.
Statutory and anti- fraud information	Criminal records and convictions. Surveillance reports.	Insurance intermediaries or other insurance market participants.	Group companies. Reinsurers. Our agents and brokers.	Setting you up or managing you as a client. Evaluating and	Processing carried out under the control of official

Categories Of Data	Type Of Information Processed	Source Of The Data	Who We Disclose The Data To	Purpose Of Processing	Lawful Basis Of Processing
		<p>Member of your family.</p> <p>Your employer.</p> <p>Anti-fraud databases, sanctions lists, court judgements and other government agencies.</p>	<p>Other intermediaries or market participants.</p> <p>Anti-fraud databases.</p> <p>Medical doctors and specialists.</p>	<p>pricing the risks to be insured and validating any appropriate premium where there is health or life insurance, including checks for potential fraud, sanctions, anti-money laundering and other statutory checks.</p>	<p>authority.</p> <p>Processing is necessary for the defence of legal claims.</p>
Claimant Information	<p>Gender and health information.</p> <p>Medical reports.</p> <p>Criminal records and convictions.</p> <p>Surveillance reports.</p> <p>Information about previous and current claims.</p> <p>Sanctions and information from anti-fraud databases concerning you.</p> <p>Bank account or payment card details.</p> <p>Income and other financial information.</p> <p>Name, address, marital status, date and place of birth, nationality, employer, job title, employment history, family</p>	<p>Insurance intermediaries or other insurance market participants.</p> <p>Your family.</p> <p>Your employer.</p> <p>Credit reference agencies.</p> <p>Anti-fraud databases, sanctions lists, court judgements and other government agencies.</p> <p>Representatives instructed by you and / or acting on your behalf.</p>	<p>Group companies.</p> <p>Reinsurers.</p> <p>Other intermediaries or market participants.</p> <p>Anti-fraud databases.</p> <p>Medical doctors and specialists</p> <p>Legal representatives</p> <p>Department for Works and Pensions</p> <p>Other government agencies as directed by regulatory requirements.</p>	<p>Setting you up as a claimant including checks for potential fraud, sanctions, credit and anti-money laundering.</p> <p>Managing insurance and reinsurance claims.</p> <p>Defending or prosecuting legal claims.</p> <p>Investigating or prosecuting fraud</p>	<p>Compliance with a legal obligation.</p> <p>Processing is necessary for the defence of legal claims.</p> <p>Prevention of fraudulent claims</p>

Categories Of Data	Type Of Information Processed	Source Of The Data	Who We Disclose The Data To	Purpose Of Processing	Lawful Basis Of Processing
	details and their relationship to you.				

## Who do we share your information with?

We may share your data with other third parties in order to meet our legal and regulatory requirements. This includes statutory bodies and third parties who request information about you that they need to help prevent or detect crime and fraud, or organisations who are responsible for tax or where we are required to give this information under an order of the court or legislation.

## Protection of your information

Your privacy is important to us and we follow strict security and organisational procedures in the processing, storage, destruction and disclosure of your information. This is to prevent unauthorised access or loss of your information. Your information may be stored both electronically and in paper records.

## Use of your consent to process special categories of personal data

In order to provide insurance, in certain circumstances we may need to process special categories of personal data, such as medical records or criminal convictions.

We follow the lawful basis that your insurer has used in processing and disclosing your special categories of personal data to us. This may be for the performance of the insurance contract or consent. If consent is used, you will not have given your consent directly to us but to the insurer that you purchased your policy from. You may withdraw your consent for us to process your special categories of personal data at any time by contacting the Data Protection Officer (details as above). However, if you withdraw your consent this will impact on our ability to provide or continue to provide insurance for your insurance policy or pay claims.

## Call Monitoring and Recording

For quality control purposes and to audit the evaluation process for the underwriting and pricing of the risks to be insured, we may review copies of telephone recording made with the intermediary that you purchased your policy from.

## Website Cookies

As is common practice with almost all professional websites our website uses cookies, which are tiny files that are downloaded to your computer, to improve your experience.

## How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

## Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore it is recommended that you do not disable cookies.

## The Cookies We Set

- Forms related cookies

When you submit data to through a form such as those found on contact pages cookies may be set to remember your user details for future correspondence.

## Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- This site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

- We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Facebook, LinkedIn and Twitter, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

## Data retention

Your personal data will only be kept for as long as it is necessary for the purpose it was collected for.

Category of data	How long we retain your data	
Individual Information	7 years after the end of the insurance agreement between us and the insurance intermediary.	
Policy Information	7 years after the end of the insurance agreement between us and the insurance intermediary.	
Financial Information	7 years after the end of the insurance agreement between us and the insurance intermediary.	
Claims Information	Period in years from either date of settlement or date of advice if no claim develops.	
	<i>Insurance</i>	<i>Years</i>
	Property	7
	Engineering	7
	Contingency	7
	Liability exc.	7
	Motor	7
	Child Injuries	To age 21 & 4 months
	Cases involving PPO's	Unlimited
Special categories of personal data (underwriting and pricing)	All asbestos / disease	Unlimited
	All protected victims	Unlimited
Special categories of personal data (claims)	As per Claims Information table above.	

## Transfer of Data

We will not transfer your personal data outside the EEA where there is not an adequate level of data protection. Your personal data may be disclosed to companies within our Group or to Service Providers outside the EEA. However, we ensure that there is an adequate level of data protection in place and adhered to by these parties.

You can find out the details about any other party we have shared your personal data with by contacting the Data Protection Officer at the address provided at the top of this Privacy Policy.

## Changes to this Direct Commercial Limited Privacy Policy

If we make changes to this Privacy Policy that affects how we process your information, we will revise the Privacy Policy and publish it on our website.