

Privacy & Fair Processing Notice

1. Introduction

Camford Sutton Associates Limited (“CSA”) are Property and Casualty Claims Consultants who provide a range of services to Insurers, Underwriters, Brokers, Suppliers and Others, including:

- Complex or “distressed” claims review and resolution
- Expert witness evidence/advice
- Loss Adjusting services – Property and Casualty
- General Consultancy and Best Practice guidance/advice (e.g. process design/re-engineering and implementation, Supply Chain reviews, Surge management and response)

To serve our Clients and/or review or manage claims on their behalf CSA are variously provided with, required to obtain, hold, share and otherwise process Personal Data. Generally, the Client for whom we are working is the “Data Controller” under GDPR, and CSA are “Data Processors” on their behalf.

The Personal Data provided (often in claim files) or which we obtain typically relates to Policyholders, their family members (where necessary/relevant), Third Party Claimants and other Parties involved in a claim.

This Notice sets out how CSA use and protect that Personal Data and the disclosures we may potentially make to other Parties involved in a given claim.

2. Personal Information that we may Hold/Obtain

- **Policyholder Details** – (all as applicable) Name, Address, Date of Birth, Risk Address (if different), Contact Telephone Numbers/Email Address, Occupation, Shareholder/Directorships (commercial claims only), Mortgage provider, VAT status/number, Bankruptcy Information, CCJs, Previous Insurance and Claims History, Current Policy Details, Security Information (safe/alarms etc), Police Crime Nos, Details of Loss/Damage sustained.
- **Third Party Claimant** – (all as applicable) Name, Address, Date of Birth, Loss Address (if different), Contact Telephone Numbers/Email Address, Occupation, VAT status/number, Bankruptcy Information, CCJs, Previous Insurance and Claims History, Current Policy Details,

Home Security Information (safe/alarms etc), Police References/Crime Nos, Details of Loss/Damage/Injuries sustained (as applicable), NI Number (TPPI claims, for CRU notification).

- **Criminal Offence Data** - where necessary to validate Policy/Risk Information previously provided to Insurers
- **Health Information/Medical Records** - where necessary in pursuit or assessment of a Personal Injury claim. We may also need to register the claim on the Ministry of Justice Portal and with the Compensation Recovery Unit.
- **Related Party Data (where applicable):**
 - **Solicitors or other Personal Representatives of Policyholders/Claimants** – Name, Address, Contact Telephone Numbers/Email Address, Reference Number
 - **Appointed Contractors/Suppliers** - Name, Address, Contact Telephone Numbers/Email Address, Reference Number
 - **Insurance Broker** - Name, Address, Contact Telephone Numbers/Email Address, Reference Number
 - **Independent Witnesses** - Name, Address, Date of Birth, Occupation, Contact Telephone Numbers/Email

3. Sources of Personal Data

We collect and obtain Personal Data from various sources, depending upon the service being provided and for whom (i.e. the Client):

- Clients, in claim files or documents we are provided for review, handling and/or resolution
- Policyholders and/or their appointed Solicitors, Personal Representatives, Contractors and Suppliers or Insurance Brokers
- Claimants and/or their appointed Solicitors, Personal Representatives, Medical Experts, Contractors and Suppliers or Insurance Brokers
- Employees or Witnesses with material information about an accident or incident we are requested to investigate, typically in the form of a witness statement
- Publicly available information, e.g. Companies House

4. How we Use and Disclose your Personal Data

In this section, we explain the purpose for which we use Personal Data, how we share the information (when applicable) and identify the “legal grounds” upon which we rely to process the information. Please note that the actual grounds for processing Special Category Data will depend upon what that information is and the circumstances of an individual case, but will be clearly recorded in each case file.

No information provided to CSA is automatically processed or profiled by CSA.

Please note that in addition to the Disclosures outlined in the table below, we may disclose Personal Data for the purpose we explain in this Notice to contractors, other service providers or agents of CSA that perform activities on our behalf.

<u>Purpose of Processing</u>	<u>Legal Grounds</u>	<u>Disclosures – with whom we share information</u>
Complex or “distressed” claims review and resolution	<ul style="list-style-type: none"> Legitimate Interests – to assist our Clients in assessing or progressing claims (and hence the performance of the insurance contract) <p>For Processing Special Category (e.g. Health or Medical) or Criminal Offence Data</p> <ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> Clients their Agents and other Experts Suppliers (of Claim Solutions)
Expert witness evidence/advice	<ul style="list-style-type: none"> Legitimate Interests – to assist our Clients in assessing or progressing claims (and hence the performance of the insurance contract) <p>For Processing Special Category (e.g. Health or Medical) or Criminal Offence Data</p> <ul style="list-style-type: none"> Consent To establish, prosecute or defend legal claims 	<ul style="list-style-type: none"> Clients their Agents and other Experts
Loss Adjusting Services – Property	<ul style="list-style-type: none"> Legitimate Interests – to assist our Clients in assessing or progressing claims (and hence the performance of the insurance contract) <p>For Processing Special Category (e.g. Health or Medical) or Criminal Offence Data</p> <ul style="list-style-type: none"> Consent 	<ul style="list-style-type: none"> Clients their Agents and other Experts Suppliers (of Claim Solutions)
Loss Adjusting Services - Casualty	<ul style="list-style-type: none"> Legitimate Interests – to assist our Clients in assessing or progressing claims <p>For Processing Special Category (e.g. Health or Medical) or Criminal Offence Data</p> <ul style="list-style-type: none"> Consent To establish, prosecute or defend legal claims 	<ul style="list-style-type: none"> Clients their Agents and other Experts Suppliers (of Claim Solutions)
General Consultancy & Best Practice Advice	<ul style="list-style-type: none"> Performance of our contract with the individual (if he/she is the Client) Legitimate Interests of CSA (to fulfil/comply with Client requirements) <p>For Processing Special Category (e.g. Health or Medical) or Criminal Offence Data</p> <ul style="list-style-type: none"> Consent To establish, prosecute or defend legal claims 	<ul style="list-style-type: none"> Clients their Agents and other Experts Suppliers (of Claim Solutions)

Investigating and prosecuting Fraud	<ul style="list-style-type: none"> • Legitimate Interests – to assist our Clients in assessing or progressing claims (and hence the performance of the insurance contract) <p>For Processing Special Category (e.g. Health or Medical) or Criminal Offence Data</p> <ul style="list-style-type: none"> • Consent • To establish, prosecute or defend legal claims • Substantial public interest 	<ul style="list-style-type: none"> • Clients • their Agents and other Experts • Suppliers (of Claim Solutions)
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5. Consent

In most circumstances, we rely upon the consent of the Data Subject to process Special Category and/or Criminal Offence Data. This allows us to share the information with our Clients to ensure that the risk information they hold is correct.

Individuals may withdraw consent to processing at any time, provided that you are not under a legal obligation to provide the data, by contacting the Data Protection Director (details below) in writing or by email, and quoting your name and the reference number of the claim we are investigating. However, it is likely that without consent, CSA might be unable to further act and/or possibly Insurers will be unable to further progress a claim.

6. Safeguards

We have in place physical, electronic and procedural safeguards appropriate to the sensitivity of the information we hold and maintain. We use software supplied by Microsoft, who operate to the Privacy Shield Framework, to store and share the information electronically. They have servers located worldwide using state of the art encryption and breach detection technologies to ensure data security. Where appropriate, the safeguards include the encryption of communications, encryption of information during storage, firewalls, access controls, separation of duties and similar security protocols.

We retain Personal Data only for so long as is necessary for the processing purpose(s) for which the information was provided or obtained. Our retention periods for Personal Data are based upon business needs and legal, regulatory and contractual requirements. In practice, this typically means the limitation period (i.e. time) specified under UK law for claims in relation to that case or information.

When Personal Data (typically in claim files or other project files) is no longer needed, it is securely destroyed and/or erased.

7. Your Rights under GDPR

Under GDPR, Data subjects have certain rights (subject to some qualifications) which you may exercise by contacting the Data Protection Director:

- *Subject Access Requests* - you can request a copy of the Personal Data we have about you, which in most circumstances will be provided free of charge
- *Right to Rectification* - you can ask us to correct information about you which is wrong or incomplete
- *Right to Erasure* - you can ask us to delete information about you
- *Right to Object* - you can tell us you no longer agree to us using information about you and ask us to stop processing
- *Right to Restrict Processing* – of Personal Data whilst we consider an enquiry
- *Right to Portability* – only relevant where the data is processed automatically (which CSA do not do)

Please note that there are certain exemptions to these rights, but we will respond to any requests within 30 days.

8. Questions, Requests or Complaints

To submit questions or requests in relation to this Privacy Notice or the above, please write to the CSA Data Protection Director:

The Data Protection Director
 Camford Sutton Associates Limited
 Booths Hall
 Chelford Road
 Knutsford
 Cheshire
 WA16 8GS

Phone: 01565 756118
 Email: info@camfordsutton.com

Complaints – if we are unable to resolve an enquiry or a complaint, individuals have the right to contact the UK data protection regulator, the Information Commissioner’s Office (“ICO”):
<https://ico.org.uk/global/contact-us/>

Changes to this Privacy Notice – We may update this Privacy Notice from time to time, including the date upon which it was last changed. We will notify our Clients where we have an agreement to do so, and others where required by law. It was last changed on 14th May 2018.