

Customer Privacy Notice



About Us

Dragonfly Crowd Limited is committed to protecting the privacy and confidentiality of all individuals and takes its responsibilities regarding the security of data very seriously. We abide by the rules of the General Data Protection Regulation (GDPR) upheld by the Information Commissioner Officer (ICO) and are authorised and regulated by the Financial Conduct Authority (FCA) to advise and arrange Insurance. This includes processing any personal data lawfully, fairly and in a transparent manner.

What information do we collect about you if you are interested in our services and why?

As a Brokerage and as part of our service we will only collect information from you so that we can advise and arrange Insurance that maybe suitable for you. In the financial services industry we call this factfinding which provides us with all the information that we need from you in order to provide you a with suitable product that meets your circumstances and requirements.

When obtaining information from you we will do this by phone, email or post and will confirm the accuracy of the data collated. It is important that all the data we hold on you is accurate so that we can advise and arrange suitable products to you.

The types of information we will collect from you includes;

Title, name, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity.

Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history.

Bank account details, tax information, loans and credit commitments, personal credit history, sources of income

and expenditure, family circumstances and details of dependents.

Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information)

Any pre-existing insurance products and the terms and conditions relating to these.

In addition, we may collect sensitive personal data such as medical conditions or criminal offence data where required to do so to arrange a policy on your behalf.

How will we use this information?

We will only use your data in ways that you would reasonably expect us to. Below summarises how we use your data.

We will use the information you provide to us to research the market on your behalf to find a suitable policy that meets your circumstances and needs. Once we have carried out research we will provide you with a personalised illustration detailing the product information. Whilst you consider the illustration we will remain in touch to answer any questions you may have

If you are happy to proceed we will then use your data to complete an application form which will then be forwarded to the relevant Insurer. We will then liaise with them on your behalf until the policy has been arranged.

We will then contact you at renewal or when your policy is due to be reviewed so that we can continue to ensure that the policy you have in place remains suitable. Where your circumstances or personal information have changed we will update our records and notify the Insurer to do the same.

We will also use your data to assist you handle any claim you have on your policy or with a complaint if you are not happy with the service you have received.

As part of our service we like to keep our customers up to date with new products or offers that are available and maybe of interest. Therefore, we may contact you from time to time through email marketing, phone, text or other types of marketing material. If you wish to opt out of this at any point then please let us know.

In the interest to improve our services, telephone calls may be monitored and/or recorded for training purposes and to assist us handle a claim or complaint. Where we record the call you will be informed of this.

The basis upon which we will process certain parts of Your Personal Data.

Where you ask us to assist you with for example your insurance, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history (Your Special Data). We will record and use Your Special Data in order to make enquiries of insurance providers in relation to insurance products that may meet your needs and to provide you with advice/guidance regarding the suitability of any product that may be available to you. If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data. The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "Criminal Disclosures"). This is relevant to insurance related activities such as underwriting, claims and fraud management. We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

The lawful basis on which we use this information

How we use your information (detailed above) we will do so using the lawful basis legitimate interests. We have decided upon this basis as it allows us to meet with the ICO and FCA rules and is the most suitable lawful basis for processing data with a view to arranging a policy.



What we will do to ensure the security of personal information

We will not share any of the information you provide to third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us regardless of whether the information is in electronic or physical format.

We use leading technologies and security measures to safeguard your information and keep strict security standards to prevent any unauthorised access to it.

How long will we retain your data

We will only hold data for no longer than is necessary. Where we have arranged a policy on your behalf we will keep your file including your personal data and any call recording, on record for a minimum of six years, in line with our regulatory obligation with the FCA. Where we need to hold your file for longer than this then we will inform you of this.

Sharing Your Personal Data.

As stated above, if you wish to proceed to take out a policy then we will pass your details on to the Insurer the policy will be arranged with. The information we pass on will be detailed within the application we complete on your behalf.

Where required we may forward your details onto regulatory authorities or fraud agencies where we have a legal obligation to do so to comply with our regulatory requirements or where fraud is suspected. We may do this under the lawful basis legal obligation.

Contact details received from a third party lead generator

Occasionally we may receive your contact details from a third party lead generator who you have expressed an interest in the products/service we have to offer. Where we use lead generators we will request from them that they have obtained your consent and have made it clear to you that they will pass your details on to a firm such as ours and that you will be expecting us to contact you.

Information from other sources

We may obtain information from other sources such as public records, if required. This is to enable us to verify who you are or facts that you have told us are accurate.

Information collected via our website

We collect web usage information when you visit our website including information such as the date, time, page viewed or searched relating to your browsing activity. Where you have provided personal data we may collect web usage information to enable us to build a demographic profile.

We may also use web usage information to create statistical data regarding the use of our website. Where statistical data is produced we may then use that data to help us assess the effectiveness of marketing campaigns, develop and deliver services and information to improve the overall effectiveness of our website. We will also use IP addresses to analyse trends, track users movements and gather broad demographic information for our own internal use.

Within our website you can interact with us, if you so wish. Where you provide your personal data on our website it will be taken as a positive action that you would like us to contact you for the purpose as set out on our website.

Cookies

When you visit our website we may store some information (commonly known as a cookie) on your computer. Cookies do not damage your computer. Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about you. Cookies are specific to the server that created them. They cannot be accessed by other servers. You do not have to accept cookies. You can decide if you want to accept cookies by changing the settings on your browser to either accept, reject or notify you when a cookie is set. All cookies used by this website are used in accordance with current UK and EU Cookie Law.



Type of Cookie Purpose

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website. Like most websites, our site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website. Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us.

What are your rights?

You have the right to:

- ✓ Be informed about how we use, share and store your personal information;
- ✓ Request access to the personal data we hold on you (also known as a Subject Access Request (SAR)). Where a SAR is requested we will respond promptly and within one month from the date we receive the request;
- ✓ Request your personal data is amended if inaccurate or incomplete;
- ✓ Request your personal data is erased where there is no compelling reason for its continued processing and we don't have a legitimate interest to retain it;
- ✓ Request that the processing of your data is restricted;
- ✓ The right to object to your personal data being processed;
- ✓ Rights in relation to automated decision making and profiling.



DRAGONFLY CROWD

HEALTH & PROTECTION INSURANCE

Where the processing of your data is based on your consent, you have the right to withdraw this consent at anytime by contacting us by phone or email. We do not use automated decision making or profiling systems.

Marketing

Where we need your consent we will ask for this separately. We do not use pre-ticked boxes or make assumptions that you have given your consent. Your consent must be freely given by positively opting in or making a clear affirmative action that you are giving your consent. We will do our very best to ensure you know exactly what you are consenting to and remind you that you may withdraw your consent at anytime by contacting us by email or phone. Where consent is obtained a record of this will be made confirming what you have consented to, the time and date and how consent was obtained.

Customers:

Our customers are important to us however we appreciate that on some occasions you may wish to look elsewhere. If you do, we would like to stay in touch and therefore will ask for your consent in order for us to do so.

Potential Customers:

Where you have expressed an interest in a product but have then decided not to proceed we would like to keep in touch therefore will ask for your consent to do so in case a product maybe of interest to you at a later date

Non-Customers:

We will only send you information about regulated products or services if we have obtained your consent to do so.

Right to complain

We hope that the service you receive from us is to the high standard you would expect. If at any point you are unhappy with the way we have used your data then please notify: Alison Gorman by email, post or phone below. If you remain concerned about the way we collect or use your personal data you can raise your concern with the Information Commissions Office (ICO) on 0303 123 1113. For further details you may visit the ICO website www.ico.org.uk

We will tend to disclose the complainants identity to whoever the complaint is about, however if you wish your identity to remain anonymous, we will try to respect that.



We will keep your complaint on record for two years once closed or six years if it also relates to how we arranged a policy and falls under the FCA ruling.

Changes to the information

We regularly review and, where necessary update our Privacy Notice. If we plan to use personal data for a new purpose our Privacy Notice will be updated and you will be notified.

How to contact us

If you wish to contact us about the above or any other matter then please contact us at:

**1st Floor Dart House
St Georges Square
Bolton,
BL1 2HB**

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time. You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.