



## Our Privacy Policy - your rights, your information and how we use it

MacDonald Group is absolutely committed to respecting and protecting your data whilst it is in our care. We collect your personal information because it is necessary to fulfil our contractual obligations to you or because you have asked us do something prior to entering into a contract, for example, providing you with a quote or providing initial advice. It also helps us to understand your needs and guides the way in which we interact and communicate with you about our products and services now and in the future.

We have strict policies and procedures in place to protect your data when you send it to us, when we process it in order to provide the services you have requested or -where you have given us your permission to do so -to send you information that we think you'll find interesting, and thereafter when we store your data securely.

We are registered with the Information Commissioner's Office, the regulator of the General Data Protection Regulation and abide by its requirements.

Our Privacy Policy contains important information about what personal details we collect; what we do with that information; with whom we may share it and why; and your choices and rights when it comes to the personal information you have given us.

We may need to make changes to our Privacy Policy from time to time, so please check our website regularly for updates. If there are important changes such as ones impacting where your personal data will be processed, we will contact you to let you know.

This version (V1) of our Privacy Policy was last updated **November 24, 2020**

## Who we are

MacDonald Group are an Independent Insurance Broker, providing commercial and personal insurance solutions. This Privacy Policy applies to MacDonald Group which is a trading style of MacDonald Group GI LLP, authorised and regulated by the Financial Conduct Authority (FRN 928234).

MacDonald Group GI LLP are registered in Scotland (SO306688) Registered office: Corrie Lodge, Millburn Road, Inverness.

## How to contact us

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact; FAO: Data Protection Officer, 2 Dundee Road, Perth, PH2 7DW.

Email: [julief@macdonaldgroup.uk](mailto:julief@macdonaldgroup.uk)

## What information we collect and what we use it for

We take your privacy seriously and we will only ever collect and use information which is personal to you where it is necessary, fair and lawful to do so. We will collect and use your information only where:

- It is necessary to fulfil our contractual obligations to you or because you have asked us to do something prior to entering into a contract, for example providing you with a quote or providing initial advice. N.B. We would be unable to offer advice and/or provide you with a suitable product or service without gathering necessary information from you.
- It is necessary in the performance of our contract with you to provide information to Insurance Companies in order to provide the most appropriate policy for your needs.
- It is necessary for us to meet our legal or regulatory obligations, for example on the detection and prevention of fraud. This may also include providing information about you to our regulator, the Financial Conduct Authority and/or The Information Commissioner's Office and where necessary to deal with any complaints, The Financial Ombudsman Service.
- It is in the legitimate interests of MacDonald Group to deliver appropriate information and guidance so you are aware of the options that will help you get the best outcome from your insurance product or investment; where we may use a type of profiling to segment your information to help us improve our communication with you and the products and services offered to you.
- It is in the legitimate interests of MacDonald Group to pursue any outstanding debts owing to the MacDonald Group using Debt Collection Services.

If you do not wish us to collect and use your personal information in these ways, it may mean that we will be unable to provide you with our products or services.

## Special Categories of Data

We will only process Special Categories of Data where we have a specific legal exemption to process sensitive personal data for insurance purposes. This exemption applies where we need to process your information as an essential part of the insurance cover, for example health data, and/or details of driving convictions, if applicable.

## Opting Out on Receipt of Email Marketing Communications

We will always ask for your consent prior to sending any email marketing communications to you. If you receive a marketing email from us, you will have the option to "opt-out" by clicking on the unsubscribe link provided at the bottom of each and every message we send you. Please be aware and take comfort that this will not unsubscribe you from our service-based messages, such as renewal notices or annual reviews.

## Telephone and Mailing Preference Services

The Telephone Preference Service (TPS), the Corporate Telephone Preference Service (CTPS) and the Mailing Preference Service (MPS) allow you to choose to opt out of unsolicited marketing. However, if you are registered on any of the preference services, which are general opt-out registers, you may still receive marketing communications from us if you have given us your consent previously or if you subsequently give us that consent.

## Automated Decision Making

We sometimes use systems to make automated decisions based on personal information we have about you. These automated decisions can affect the products, services or features we offer you now or in the future. We use automated decisions in the following ways:

- As Financial Sanctions Checks, a regulatory requirement for the prevention of fraud.
- To segment your information into different categories, for example Business Insurance and Personal Insurance, in order to ensure we send communications that are of interest and are relevant to you (profiling).

## Information we collect and use

The MacDonald Group collects both Personal Data and Anonymous Data when you send us information or when you visit our website. When we talk about Personal Data we mean any information that can identify you as an individual, such as your name and postal address. Anonymous Data doesn't identify you as a person but it might be used in aggregate, for instance when you participate in a customer service survey.

From time to time and with your prior permission we may receive information about you from an Introducer Appointed Representative, in order that we can provide you with a service. Where this is the case the information we collect from the introducer will be limited to:

- Information about who you are e.g. your name, date of birth, contact details.
- Information about your contact with the introducer, i.e. notes on what service it is you would like us to provide and possibly details of current provisions you have in place.

## What are cookies?

A cookie is a small piece of data – it is saved onto your computer or other device when you visit our website. Cookies store small elements of information. For example, they will remember you've visited our website or performed a certain action.

We use cookies to help us improve your experience when you visit our website. For example, a cookie might store information so you don't have to keep entering it. Cookies also let us know which pages of our website you visited; they allow us to develop and market our products and services.

## Where we collect your information

We may collect your personal information directly from you, from a variety of sources, including:

- an application form for a product or service
- telephone conversations with us
- emails or letters sent to MacDonald Group
- meetings with one of our qualified staff members
- participation in research surveys to help us understand you better and improve our products and services
- our online services such as our website and social media platforms

## Parties with whom we may share your information

We may share your information with third parties for the reasons outlined in 'What we collect and use your information for.'

These third parties include:

- Companies we have chosen to support us in the delivery of the products and services we offer to you and other customers e.g. Insurance Companies and cloud service providers.
- Our regulators and Supervisory Authority e.g. the Financial Conduct Authority (FCA), the Information Commissioner's Office for the UK (the ICO), and the Financial Ombudsman Service.
- Law enforcement, credit and identity check agencies for the prevention and detection of crime
- Debt recovery services, should it become necessary to recover any outstanding debts owed to the MacDonald Group.

**N.B. We will never sell your details to someone else. Whenever we share your personal information, we will do so in line with our obligations to keep your information safe and secure.**

## Where your information is processed

The MacDonald Group will only ever process your data in the UK.

Where it is necessary for the performance of our contract with you to provide information to Insurance Companies, Savings & Investment Companies and Pension Providers, please be aware that these third parties may process some data outside of the UK/EEA. These companies are also required to ensure that your information is protected to at least an equivalent level as would be applied by UK/EEA data privacy laws.

## How we protect your information

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or via any other media, will have appropriate safeguards applied in line with our data protection obligations.

Our staff are trained in data security, and our policies and procedures help our staff to understand what is required of them under their obligations to us, and also their responsibilities under all Data Protection and other privacy legislation.

When we ask another organisation to provide a service for us, we ensure that they have appropriate security measures in place. If we or our service providers transfer any information out of the European Economic Area (EEA), it will only be transferred with the correct protection in place, as stated by UK law.

Our security controls are aligned to industry standards and good practice, providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

## Leaving our website and moving on to third party websites

When you click on links on any of our sites, you will leave our site and go to a third-party site, which is outside of our control. We do not accept responsibility for, and have no control over, content of third-party sites. It must be noted that our Privacy Policy does not apply to these companies, sites or content and if such third-party sites collect Personal Data, we cannot control how this data is processed, stored or used. We strongly advise that you read their proprietary data collection statements, which accompany any registration and their Privacy Policies before you submit your personal information.

The internet is not a totally secure medium and you acknowledge and agree that the MacDonald Group shall not be responsible for any unauthorised use, distribution, damage or destruction of personal data, except to the extent that we are required to accept such responsibility under all Data Protection and other privacy legislation.

## How long we keep your information

We will keep your personal information only where it is necessary to provide you with our products or services while you are a client and for a period thereafter, but only where we are required to meet our legal or regulatory requirements. The length of time we keep your information for these purposes will vary depending on the obligations we need to meet.

## Your individual rights summary

You have several rights in relation to how MacDonald Group uses your information. They are:

### Right to be informed

You have a right to receive clear and easy to understand information on what personal information we have, why and with whom we may share it – we do this in our Privacy Policy.

### Right of access

You have the right of access to your personal information. If you wish to receive a copy of the personal information we hold on you, you may make a data subject access request (DSAR). This can be done by contacting our Data Protection Officer. We will require that you satisfactorily identify yourself to demonstrate your entitlement to view this data.

### Right to request that your personal information be rectified

If your personal information is inaccurate or incomplete, you can request that it is corrected.

### Right to request erasure

You can ask for your information to be deleted or removed if there is not a Legal or Regulatory reason for MacDonald Group to continue to retain it.

### Right to restrict processing

You can ask that we block or suppress the processing of your personal information for certain reasons. This means that we are still permitted to keep your information – but only to ensure we don't use it in the future for those reasons you have restricted.

## **Right to data portability**

You can ask for a copy of your personal information for your own purposes to use across different services. In certain circumstances, you may move, copy or transfer the personal information we hold to another company in a safe and secure way. For example, if you were moving your pension to another pension provider.

## **Right to object**

You can object to MacDonald Group processing your personal information where it's based on our legitimate interests for direct marketing (including profiling) and where we have previously gained your consent for email marketing.

## **Rights related to automatic decision making including profiling**

You have the right to ask MacDonald Group to:

- give you information about its processing of your personal information
- request human intervention or challenge a decision where processing is done solely by automated processes
- carry out regular checks to make sure that our automated decision making and profiling processes are working as they should

## **How to make a complaint**

We will always strive to collect, use and safeguard your personal information in line with data protection laws. If you do not believe we have handled your information as set out in our Privacy Policy, **please contact our Data Protection Officer** and we will do our utmost to make things right.

If you are still unhappy, you can complain to our Supervisory Authority. Their contact details are:

**Information Commissioner's Office:** <https://ico.org.uk/>