

# **DIRECT COMMERCIAL LIMITED**

## **Privacy Policy**

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## 1. Introduction

This Privacy Policy is designed to help you to understand how we process your Personal Data. It explains how we use Personal Information which we collect about individuals in relation to commercial motor insurance.

Under the UK GDPR, the Information Commissioner's Office (ICO) has defined Personal Data as:

*Any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*

This Privacy Policy is issued by Direct Commercial Limited. When we mention 'DCL', 'we', 'us' or 'our', what we mean is Direct Commercial Limited or any other the relevant company in the same legal group that processes your Personal Data.

If you are a customer of Direct Commercial Limited, you will have purchased your insurance through an intermediary, e.g. through a Financial Conduct Authority (FCA) regulated 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 insurance policy through.

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.

This Privacy Policy covers all of our products.

We take the security of your Personal Data very seriously. We use a combination of technical, organisational and physical security measures to protect your Personal Data in line with our obligations under data protection law. Our employees receive training to help us comply with data protection law and safeguard your privacy. If you provide us with Personal Data about someone else, we'll assume that you have their permission, where required. We'll process their Personal Data according to this Privacy Policy.

## 2. Who we are

Direct Commercial Limited (DCL) is an insurance intermediary offering insurance products from a single insurance provider and is authorised and regulated by the FCA, registration No. 307505.

DCL are also registered with the Information Commissioners Office (ICO), the registration number is Z6731192.

DCL are registered in England & Wales, registration No. 03133493 with the registered address being Redwing House Hedgerows Business Park, Colchester Road, Chelmsford, Essex, England, CM2 5PB.

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

Each Insurer we work on behalf of is also a Data Controller and they will also have access to your Personal Data. How they handle your Personal Data will be contained within their own Information Notice/Privacy Policy.

### 3. What Personal Data do we collect about you?

#### **Sources of Personal Data:**

We obtain Personal Data directly from you, including from Application and Claims forms that you complete, communications between us, your participation in market research, your use of our website(s).

We may also obtain Personal Data from third parties, including (but not limited to) the following:

- Insurance brokers;
- Third parties who provide you with services relating to your product e.g. roadside assistance providers;
- Third parties who provide us, or a third party insurer relevant to your product or claim, with services e.g. loss adjusters, claims handlers, legal advisers, assistance providers, experts and, in limited circumstances, private investigators;
- Third parties involved in your product or claim, e.g. other insurers, brokers, claimants, defendants and witnesses to an incident;
- Credit reference agencies;
- Financial crime, fraud or uninsured detection agencies, databases and sanctions lists, including the Motor Insurers' Bureau (MIB) who are the data controller for the Motor Insurance Database (MID), the Claims Underwriting Exchange (CUE), Motor Insurance Anti-Fraud Theft Register, No Claims Discount Database, MyLicence, Whiplash Reforms Programme and Insurance Fraud Bureau (IFB);
- Government agencies and regulatory bodies including the police, the courts, the Driver and Vehicle Licensing Agency (DVLA), Driver and Vehicle Agency Northern Ireland (DVA), Driver and Vehicle Standards Agency (DVSA), the Equipment Register, the Department for Work and Pensions (DWP), Companies House, the Solicitors Regulation Authority (SRA) and HM Revenue & Customs (HMRC);
- Regulators who regulate how we operate including the Financial Conduct Authority (FCA), Prudential Regulation Authority (PRA), Information Commissioner's Office (ICO) and the Financial Ombudsman Service (FOS);
- Insurance industry bodies, including the MIB and the Association of British Insurers;
- Other third party suppliers including actuaries, auditors, legal advisers and other professional service firms and sanctions checking service providers;
- Data suppliers, e.g. Experian and LexisNexis;
- Publicly available sources including HM Land Registry, the Office for National Statistics (e.g. census data) and other data made available under the Open Government Licence, internet searches, news articles, online marketplaces and social media sites, apps and networks (e.g. Twitter, Facebook and Instagram);

### **Types of Personal Data collected:**

The Personal Data we hold and process includes:

<b>Categories of data</b>	<b>Type of information processed</b>	<b>Where the data may come from</b>	<b>Who we may disclose the data to</b>	<b>Potential purpose of processing</b>	<b>Lawful basis of processing</b>
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.

**Types of Personal Data collected (continued):**

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
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 databases, sanctions lists, court judgements and other government agencies.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases.	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 pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you. Compliance with a legal obligation. Processing is necessary for the defence of legal claims.

**Types of Personal Data collected (continued):**

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
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 inc. medical experts, loss adjusters, 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.



### **Types of Special Category Personal Data collected:**

The Special Categories of Data we hold and process includes:

<b>Categories of data</b>	<b>Type of information processed</b>	<b>Source of the data</b>	<b>Who we disclose the data to</b>	<b>Purpose of processing</b>	<b>Lawful basis of processing</b>
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.  Member of your family.  Your employer.  Anti-fraud databases, sanctions lists, court judgements and other government agencies.	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 validating any appropriate premium where there is health or life insurance, including checks for potential fraud, sanctions, anti-money laundering and other statutory checks.	Processing carried out under the control of official authority.  Processing is necessary for the defence of legal claims.

### **Types of Special Category Personal Data collected (continued):**

<b>Categories of data</b>	<b>Type of information processed</b>	<b>Source of the data</b>	<b>Who we disclose the data to</b>	<b>Purpose of processing</b>	<b>Lawful basis of processing</b>
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 details and their relationship to you.</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>

**Other types of Personal Data collected:**

We may also hold and process Vulnerability Data (i.e. information about health, life events, resilience and capability) that helps us identify if you might have additional support requirements in order that we can better meet your needs.

**Uses of Personal Data:**

The main purposes for which we use Personal Data are to:

- Communicate with you and other individuals;
- Assessing claims, including the validity of any claim and its value and pursuing any losses against you or a third party;
- Process payments when you purchase a product or service and any refunds;
- Provide our products and services, including insurance administration, taking payment, making changes where requested or necessary, managing renewal, claims assessment, settlement and dispute resolution and the provision of our apps and other technologies;
- Manage relationships with third parties, e.g. brokers and service providers;
- Prevent, detect and investigate fraud and other crime, including by carrying out fraud, sanctions and anti-money laundering checks.
- Provide marketing information;
- Manage complaints, including to allow us to respond to any current complaints, or challenges you or others might raise later, for internal training and monitoring purposes and to help us to improve our complaints handling processes. We may be obliged to forward details about your complaints, including your Personal Data, to the appropriate authorities, e.g. the relevant ombudsman;
- Manage feedback and queries, and handle requests to exercise data subject rights. For further information see Data Rights;
- Comply with applicable legal, regulatory and professional obligations, including cooperating with regulatory bodies (e.g. the FCA, PRA and ICO), MIB, ELTO and government authorities, to comply with law enforcement and to manage legal claims;
- Identify and support customers requiring additional support, to help us better meet your needs and to comply with regulatory guidance about how we meet your needs. Sometimes you or a third party may tell us that you have additional support requirements, and in other cases we may infer this from your Personal Data and our interactions with you;
- Establish, enforce and defend our legal rights or those of third parties, including enforcing our terms and conditions, pursuing available remedies and limiting our damages;
- Carry out activities that are in the public interest, e.g. we may need to use Personal Data to carry out anti-money laundering checks;

**Lawful Bases for uses of Personal Data:**

We are committed to collecting and using Personal Data in accordance with applicable data protection laws. By law, we must have a legal justification, known as a lawful basis, in order to use your Personal Data for the purposes described in this Privacy Policy. Depending upon the purpose, our lawful basis will be one of the following:

- Performance of a contract – to arrange, underwrite or manage our products, or handle claims in accordance with their terms where we provide an insurance policy directly to you;
- Compliance with a legal obligation – to meet responsibilities we have to our regulators, tax officials, law enforcement, or other legal responsibilities;
- Legitimate interests – to arrange, underwrite or manage our products, or handle claims in accordance with their terms where we provide an insurance policy to a third party, to operate and improve our products and services and keep people informed about our products and services or for any other purposes we identify as appropriate to our business needs, or those business needs of a third party;
- Consent – where we have obtained appropriate consent to collect or use your Personal Data for a particular purpose.

**Use of your consent to process special categories of Personal Data:**

Please also refer to the Section above entitled 'Lawful Bases for uses of Personal Data'.

In order to provide commercial motor 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 Insurance Broker 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 your Insurance Broker 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 at the address provided in Section 11 of this Privacy Policy. However, if you withdraw your consent this may impact on our ability to provide or continue to provide insurance for your insurance policy and/or pay claims.

## 4. Who do we share your Personal Data 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.

- Insurance brokers, financial advisers and business partners, who help us arrange, manage and underwrite our products and who provide insurance services;
- Our insurers or reinsurers in respect of risks underwritten by us;
- The policyholder, where you are covered under an insurance policy held by a third party (e.g. your employer);
- Third parties who provide you with services relating to your product, e.g. roadside assistance providers;
- Third parties who provide us, or a third party insurer relevant to the product or claim, with services, e.g. loss adjusters, claims handlers, assistance providers, third-party case managers handling your care or treatment pathway, experts and, in limited circumstances, private investigators;
- Legal advisers, accountants, auditors, financial institutions and professional service firms who act on our or your behalf, or who represent a third-party claimant;
- Financial crime detection agencies, sanctions checking providers and third parties who maintain fraud detection databases or provide assistance with investigation in cases of suspected fraud;
- Regulators who regulate how we operate, including the FCA, PRA, FOS, HMRC, ICO and the Advertising Standards Authority;
- Government agencies and regulatory bodies including the police, courts, DVLA, DVA, DVSA, Solicitors Regulation Authority (SRA) and the DWP;
- Insurance industry bodies, including ELTO, MIB and the Association of British Insurers;
- Third party payment service providers who process card and other payments for us;

## 5. Protection of your Personal Data

We take the security of your Personal Data very seriously. We use a combination of technical, organisational and physical security measures to protect your Personal Data in line with our obligations under data protection law. Our employees receive training to help us comply with data protection law and safeguard your privacy. This is to prevent unauthorised access or loss of your information. Your information may be stored both electronically and in paper records.

## 6. 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.

## 7. Marketing

We may use Personal Data to send either you, or your appointed broker, direct marketing communications about our products and services that we feel you'll be interested in. Marketing communications may be sent by email or post. You may also see display advertising on websites, social media, television or in online search results.

You have control over our use of your Personal Data in relation to marketing communications. You can:

- 'Opt out' of receiving direct marketing. . Our email or post marketing communications include information to help you manage your marketing preferences;
- Change your marketing preferences at any time by e-mailing us at [dpo@directcommercial.co.uk](mailto:dpo@directcommercial.co.uk) or writing to us at Data Protection Officer, Redwing House Hedgerows Business Park, Colchester Road, Chelmsford, Essex, England, CM2 5PB.

Please note that opting out of one type of marketing, e.g. by email, doesn't mean you will be opted out of all marketing. Bear this in mind when you manage your preferences. You can always contact us directly if you would like us to stop all forms of direct marketing.

We try to limit marketing and only send you information that you might be interested in. Please remember that if you opt out of receiving marketing, we will still send you communications relating to your products. You may still see generic advertising displayed online.

### **Cookies and similar technologies:**

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 our website. 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

When you land on our website a pop-up will appear that allows you to either accept or decline our cookies. Alternatively, 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 our (and many other websites) that you visit. Disabling cookies will usually result in also disabling certain functionality and features of our website. 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 our website that allow you to connect with your social network in various ways. For these to work social media sites (including Facebook, LinkedIn and Twitter) will set cookies through our website which may be used to enhance your profile on their website or contribute to the data they hold for various purposes outlined in their respective privacy policies.

## 8. Data Retention

We keep Personal Data for as long as is reasonably required for the purposes explained in this Privacy Policy. We also keep records – which may include Personal Data – to meet legal, regulatory, tax or accounting needs. For example, we are required to retain an accurate record of your dealings with us, so we can respond to any complaints or challenges you or others might raise later. We'll also retain files if we reasonably believe there is a prospect of litigation. The specific retention period for your Personal Data will depend on your relationship with us and the reasons we hold your Personal Data.

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
	All asbestos / disease	Unlimited
	All protected victims	Unlimited
Special categories of Personal Data (underwriting and pricing)	As per Policy Information table above.	
Special categories of Personal Data (claims)	As per Claims Information table above.	

## 9. Transfer of Personal Data

Sometimes we, or third parties acting on our behalf, may need to transfer Personal Data outside of the UK. We'll always take steps to ensure that any transfer of Personal Data outside the UK is carefully managed to protect your privacy rights and ensure that adequate safeguards are in place. 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 in Section 11 of this Privacy Policy.

## 10. Data Rights

You have legal rights under data protection laws in relation to your Personal Data.

We may ask you for proof of identity when you make a request to exercise any of these rights. We do this to ensure we only disclose information to the right individual.

We aim to respond to all valid requests within one month. It may take us longer if the request is particularly complicated or you have made several requests. We'll always let you know if we think a response will take longer than one month. We may also ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to do what you have asked. This is because your rights will not always apply, e.g. if it would impact the duty of confidentiality we owe to others, or if the law allow us to deal with the request in a different way. We will always explain to you how we are dealing with your request. In some circumstances (such as the right to erasure or withdrawal of consent), exercising a right might mean that we can no longer provide our product to you.

Your rights are as follows:

- **Access to your Personal Data:**  
You may ask us for a copy of your Personal Data together with specified details about how we use your information. This is commonly known as a 'subject access request'. Please refer to Section 11 if you wish to make a subject access request. If your request is made electronically, we will, where possible, respond to you electronically. Otherwise, we will normally respond in writing unless you request otherwise.
  - **Rectification of your Personal Data:**  
We do our best to ensure that your Personal Data is accurate and kept up to date. If you believe your information is inaccurate or incomplete, then please contact us to request that we amend or update it.
  - **Erasing your Personal Data:**  
You may ask us to erase your Personal Data, but this right only applies in certain circumstances, e.g. where:
    - it is no longer necessary for us to use your Personal Data for the original purpose;
    - our lawful basis for using your Personal Data is consent and you withdraw your consent; or
    - our lawful basis is legitimate interests and there is no overriding legitimate interest to continue using your Personal Data if you object.
- This isn't an absolute right and we have to balance your request against other factors such as legal or regulatory requirements, which may mean we cannot erase your Personal Data.
- **Restricting processing of your Personal Data:**  
You may ask us to stop using your Personal Data in certain circumstances such as:
    - where you have contacted us about the accuracy of your Personal Data and we are checking the accuracy;

- If you have objected to your Personal Data being used based on legitimate interests.

This isn't an absolute right and we may not be able to comply with your request.

- **Right to object:**

You can object if you no longer wish to receive direct marketing from us.

You may also object where you have grounds relating to your particular situation and the lawful basis we rely on for using your Personal Data is our (or a third party's) legitimate interests. However, we may continue to use your Personal Data where there are compelling legitimate grounds to do so.

- **Automated decision making and profiling:**

You have the right not to be subject to a decision using your Personal Data which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. This right does not apply if the decision is:

- necessary for the purposes of a contract between us and you;
- authorised by law (e.g. to prevent fraud); or
- based on your explicit consent.

You do however have a right to request human intervention, express your view and challenge the decision.

- **Withdrawing consent:**

In some circumstances we ask for your consent to use your Personal Data. You are free to withdraw your consent at any time.

If it is the case that we need your consent to provide you with a particular product and you wish to withdraw your consent, we may no longer be able to provide our product to you. Where that is the case, we will inform you before taking any action.

## 11. Contacting DCL

Please contact the Data Protection Officer if you have questions concerning this Privacy Policy or how to exercise your Data Subject Access Rights.

Write to: Liam Guilfoyle, Data Protection Officer, Direct Commercial Limited, Redwing House, Colchester Road, Chelmsford, Essex, CM2 5PB.

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

If you're not happy with the way we're handling your Personal Data, you have a right to make a complaint with your local data protection supervisory authority at any time. In the UK this is the Information Commissioner's Office (ICO). The ICO are contactable in writing at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by phone at 0303 123 1113. We ask that you please attempt to resolve any issues with us before contacting the ICO.

## 12. Updates to this Policy

This Privacy Policy may be updated from time to time to take account of changes in our business activities, legal requirements and to make sure it is as transparent as possible.

The latest version of this Privacy Policy will always be made available on our website.