

RedArc Assured Limited Privacy Policy

Effective date: 19th January 2021

RedArc Assured Limited (we, us or our) knows that you care how your information is used and shared and we appreciate your trust in us to do that carefully and sensibly. Your privacy is important to us and we are committed to protecting and respecting your privacy.

This privacy policy explains how we use any personal information we may collect from you, is provided to us about you or you provide to us when you use our website, become a recipient of our services or make use of our products.

For an explanation of all the terms in this policy click <u>here</u>.

Who we are

We are RedArc Assured Limited, trading as RedArc and we are the <u>Controller</u>. We are part of the <u>Howden</u> Group and our business contact details are:

Registered office: One Creechurch Place, London, EC3A 5AF

Telephone: 01244 625180

Email: enquiries@redarc.co.uk

Website: www.redarc.co.uk

LinkedIn: https://www.linkedin.com/company/red-arc-assured-limited/

The contact detail of our Data Protection Officer is:

Name: Owen Davies

Address: One Creechurch Place, London, EC3A 5AF

Telephone: 020 3327 5700

Email: DPO@howdengroup.com

Personal data we collect

The specific types of personal information we may collect and use about you will depend upon your use of our website facilities, services or products, how you use them and the information you choose to provide.

The types of information we collect directly from you are:

- Name, phone number, email address
- Postal address
- Date of birth
- Personal details, health information (physical or mental)
- Age
- Gender

The types of information we collect from you automatically are:

IP address, MAC address, browser types, browser language, operating system, general location data- the country from which you accessed the our website, software and hardware attributes (including device IDs), referring and exit pages and URLs, platform type, the number of clicks, files you download, domain names,



landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the terms you use in searches on our sites, the date and time you used the website, any form submitted, error logs, and other similar information;

We and our website service provider (a <u>data processor</u> that works on our behalf), may use a variety of technologies, including <u>cookies and similar technologies</u>, to assist in collecting this information, as is discussed below.

Aggregate/Anonymous Data

We may aggregate and/or anonymise any personal information collected through the facilities, services or products offered so that such information can no longer be linked to you or your device. We may use this information for any purpose and may share this data with our third parties.

Please note that we need certain types of information so that we can provide the website facilities, services and products to you. If you do not provide us with such information, you may no longer be able to access or use our services or products

Personal data we obtain from third parties

We obtain information about you from our business partners such as Insurance Companies and Membership Organisations who have made our services available to you. We obtain the following categories of data:

- Name, phone number, email address
- Postal address
- Date of birth
- Personal details, health information (physical or mental)
- Age
- Gender

Why we collect and use your personal data

We, or our data processors, use your information for various purposes depending on the types of information we have collected from and about you and the specific facilities, services or products you use. In particular, we collect your information for the following purposes:

- to contact you in response to your enquiry about the services we offer;
- to provide you with the services you request;
- to enhance and improve your experience on our website, ensure the security of our facilities and develop the service and products we offer;
- to carry out analysis and develop statistics;
- to monitor and improve our customer service standards;

The <u>legal bases</u> for using your information are as follows:

- Where you have requested a service the use of your information including special categories of
 information is necessary for the provision of those services or products and we will ask for your
 explicit consent prior to its collection;
- Where we collect your information from a third party for the reason of providing a service to you, the legal basis for using your information is <u>substantial public interest</u>.
- Where we collect your information automatically the legal basis is for our <u>legitimate business</u> <u>interests</u>. This is to provide security for our website, operate our business and provide our services and products, ensure safe environments for our staff and visitors to our offices, comply with legal requirements and defend our legal rights, prevent fraud and to know you, our customer to whom we are providing the facilities, services or products.



Who we share your personal data with

Organisation / Entity	Information shared	Reason for sharing
Sub-contractors and Third Party Service Providers	Name, contact information and details of your medical condition	With your explicit consent to provide you with private consultations, counselling, therapy or to purchase specialist equipment etc. needed to help us provide the service you require

International Transfers

For business purposes, to help prevent/detect crime or where required by Law or Regulation, we may need to transfer, or allow access to, your personal data to parties based overseas. These parties include brokers, insurers, re-insurers, service providers, other Howden Group companies & law enforcement agencies. Where we do this, we will ensure that your information is transferred in accordance with the applicable Data Protection requirements.

If the Data Protection laws of the country where we transfer your data are not recognised as being equivalent to those in the UK, we will ensure that the recipient enters into a formal legal agreement that reflects the standards required.

You have the right to ask us for more information about the safeguards we have put in place as mentioned above. Contact us as set out in this Privacy Policy if you would like further information or to request a copy where the safeguard is documented (which may be redacted to ensure confidentiality).

How long we will keep your personal data

We don't keep your personal data for longer than we need to, which is usually up to 8 years after your relationship with us as a RedArc patient ends and for as long as we are required to keep it by law. In order to ensure we meet our obligations, we have a produced retention schedule that indicates when personal information should be disposed of.

Cookies and similar technologies

When we collect information automatically, as stated above, we and our service providers use Internet server logs, cookies, tags, SDKs, tracking pixels and other similar tracking technologies. We use these technologies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences. As we adopt additional technologies, we may also gather information through other methods.

For more information on the cookies we use, the purposes for which we use them and how you can control them please refer to our <u>Cookie Policy</u>.

Marketing and research

You have choices when it comes to receiving marketing communications and taking part in market research. We do not carry out marketing activity to our clients and by default you will be opted out of receiving any marketing communication should this change in the future. We will not send you marketing communication about our products and services.



How to access and control your personal data - Your rights

You have certain rights with respect to your information which are summarised below. Some of the rights are complex therefore, not all details are included in the summary:

- **Right to be informed:** you should be given, at the time your information is collected, or can ask for information about how your information is collected and used;
- Right of access: you can ask for copies of all the information that we process about you;
- Right to rectification: you can ask to have inaccurate information held about you corrected;
- **Right to erasure:** you can ask for the information held about you to be erased (subject to certain criteria);
- **Right to restriction of processing:** you can ask us to stop processing your information (under certain circumstances);
- **Right to data portability:** you can, under certain circumstances, request that we transmit your personal information to another provider of services;
- **Right to object**: you can object to your information being processed if our legal basis for processing your information is based on a "<u>legitimate interests</u>". To check whether we use your information for "legitimate interests" see the section "**Why we collect and use your personal data**" above.

You also have the right to object to direct marketing if you make such an objection, we will cease to process your personal information for this purpose.

If you would like to exercise any of your rights mentioned above, you can do so by writing or emailing our Data Protection Officer or Customer Care team at the address detailed above.

Your right to withdraw consent

Where you have provided consent for us to process your information you can withdraw your consent at any time. **Please note**: Withdrawal will not affect the lawfulness of processing prior to you withdrawing your consent.

You can withdraw your consent in the following ways:

• In writing, to our Customer Care team or Data Protection Officer;

Your right to make a complaint

If you have a complaint about the way we process your personal data or think that we have not complied with your rights, you can make a complaint to:

The Information Commissioners Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Telephone: 0303 123 1113 or 01625 545745

Fax: 01625 524510 Website: www.ico.org.uk

Changes to this policy

You will be informed of changes to this policy by dedicated service email or letter or by notification on our website.



RedArc Assured Limited Cookie Policy

Effective date: 25th May 2018

Like many companies, RedArc (we, us and our) use technology on our website to collect information that helps us enhance your online experience and discover how you use our website.

At RedArc, we respect your concerns about privacy and value the relationship we have with you. The cookies we use allow our website to work and help us to understand what information is most useful to visitors.

What are cookies?

A cookie is a text file containing information which is downloaded to your desktop or laptop computer, tablet or mobile device when you visit our website. Cookies are useful because they allow our website to recognise your device. Cookies are then sent back to our website on each time you visit, enabling the website to "remember" you or your device. A cookie cannot read data off your hard drive or read cookie files created by other sites.

When we refer to cookies throughout this Policy, we intend to cover all similar devices including web beacons and log files. You can find more information about cookies at All About Cookies (www.allaboutcookies.org), Your Online Choices (http://www.youronlinechoices.com/uk/) or About Cookies (www.aboutcookies.org).

The information we collect and why

Part of creating an enjoyable and lasting experience for our customers is to use cookies to process information in order to better understand what you want from our site. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your device.

Examples of the types of information we collect via cookies are:

- how often you visit our website, the pages you visited on our website, your click-through on our website and the total time you spent on our website;
- the website you visited before our website;
- Whether you have visited our website before or if you are a new visitor;
- Your viewing preferences (e.g. layout, sizing preferences, language, etc.); and
- Your IP address, browser type and operating system, for system administration and to enable us to recognise you when you return to our website;

Please note: we do not collect your name or email address via cookies.

Cookies help us to improve our site and to deliver a better and more personalised service. They enable us to:

- To estimate our audience size and usage pattern
- To store information about your preferences, and so allow us to customise our site according to your individual interests
- To speed up your searches
- Customise your visit: we may use information from your visit to help improve your next visit to our site: and
- look at customer trends: we compile information from thousands of customer visits and analyse it as a whole. This kind of study focuses on identifying trends among the many visitors to our site rather than analysing information about any individual customer.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you visit or log on to our website.



The type of cookies we use

When you use our website, the following categories of cookies may be set on your device:

First-party cookies

These cookies are set by RedArc and can be:

- Strictly necessary cookies These cookies enable you to move about the site or to receive certain
 requested features, such as storing language preferences or allowing you to place orders on the
 website; or
- Analytics cookies These cookies collect statistical (aggregated and anonymous) information
 about the use of the website by you and other visitors. This information allows RedArc to enhance
 the functionality our website.
- Functionality These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features.
- Targeting These cookies will collect information about your browsing habits and allow us to show you adverts we think will interest you while you are browsing our site and other sites on the internet.

Third-party cookies

In addition to our use of these applications, certain third parties may set and access cookies on your computer, and in conjunction with web beacons:

- Strictly necessary cookies These cookies enable useful services, for example human verification;
- Analytics cookies These cookies collect statistical (aggregated and anonymous) information
 about the use of our website by you and other visitors. This information allows the third party to
 enhance the functionality our website.
- Targeting These cookies will collect information about your browsing habits and allow the third
 party to show you adverts they think will interest you while you are browsing our site and other
 sites on the internet.

How long cookies are stored on your device

The length of time cookies are stored on your device can vary, but they generally fall into two categories: temporary session or persistent cookies.

Temporary session cookies

We use temporary session cookies on all of our secure pages to assign and store a session ID to you so that you can move uninterrupted between the areas of our site. This session ID is also used for internal reporting purposes. It is not personally identifiable to you, and this type of cookie does not leave any retrievable information on your hard drive. Most of our first-party cookies are session cookies which expire when you close your internet browser.

Persistent cookies

Our first-party analytics cookies and third-party cookies are persistent cookies because they are used to help us understand visitor patterns over a longer term or to provide additional functions you have requested in relation to site customisation and saved or stored content. They can be stored on your computer for 24 hours, a week, or several years, depending on the function they're helping to perform.



The cookies we use on this website

We use the cookies detailed below < list cookies in table>:

Cookie Name	Source	Purpose	Туре	Expires
_ga	Google	Performance / Tracking	Analytical cookie	2 yrs
_gid	Google	Performance / Tracking	Analytical cookie	24hrs
_gat	Google	Performance / Tracking	Analytical cookie	10 mins
reCAPTCHA	Google	Protects spam and abuse	Session cookie	
PHPSESSID	RedArc	Strictly Necessary	Session cookie.	
wordfence_verifiedHuman	Wordfence	Protects the site. This is a plug in used across all sites	Session cookie.	24hrs
Wfvt_XXXXXX	Wordfence	Each session, new cookies are generated	Session cookie	1hr

How to manage cookies

We will only set cookies on your device if you have provided consent. If you are concerned about having cookies on your device, you can use your browser settings to:

- delete all cookies;
- block all cookies;
- allow all cookies;
- block third-party cookies;
- clear all cookies when you close the browser;
- open a 'private browsing' / 'incognito' session, which allows you to browse the internet without storing local data;
- notify you each time new cookies are placed on your device; and
- install add-ons and plug-ins to extend browser functionality.

You can find out more information about controlling cookies from:

- Internet Explorer
- Chrome
- Firefox
- Safari
- Opera

In addition, if you use <u>Firefox</u> or <u>Internet Explorer 11</u> there is an option to turn on the **Do Not**

Track functionality, which allows you to tell websites not to track you. Google has also published a browser add-on to allow you to choose what information about your websites you visit is sent to Google Analytics, this can be downloaded here. Full details on the cookies set by Google Analytics are published on the Google website.

Please note: if you choose to disable some or all cookies, you may not be able to make full use of our website and some useful features will not work.



Changes to the policy

We will inform you of any changes to this policy by dedicated service emails or by notification on this website. If you have any questions or concerns regarding our use of cookies, or if you want to exercise your right to access your data and/or have any information we hold about you rectified, you can <u>contact us</u>. You will also find more information about how we process your information in our <u>Privacy Policy</u>.