

Personal Data Policy

This privacy policy explains how Choice Benefits (“Choice Benefits,” “we” and “us”) obtains, utilises, shares and safeguards information collected from clients and visitors to its website, including without limitation

www.choicebenefits.co.uk

By visiting our Websites or by becoming a Choice Benefits client, you consent to the collection, use and transfer of your personal data pursuant to the terms of this privacy policy.

The Personal Data We Collect From You

Choice Benefits collects personal data that you choose to provide to us through email, over the phone and otherwise, including your name, contact information, work address, email address, phone number, and if you are a potential or current client, we may additionally collect home address, employment and biographical information, banking information, and payment preferences.

How Your Personal Data is Used

We utilise personal data collected to fulfil our services to you and develop, support and improve our business. We do not sell or share your personal data with third parties for marketing or solicitation purposes. We do not use IP addresses or web page request information to try and identify you (nor do we disclose that information to third parties for them to use for their own purposes). Choice Benefits and trusted third parties (insurers and service providers) utilise personal data only for the purposes for which it was obtained.

How Your Personal Data is Disclosed

Personal data provided to Choice Benefits will be processed and stored by us inside the United Kingdom and will be accessed by our staff and third parties working with us for the purposes set forth in this policy or for other purposes subject to your consent.

Choice Benefits may share your personal data with our panel of insurers and service providers, solely in connection with our services to you.

Choice Benefits may disclose the fact that you are a client and personal data collected about you in response to a valid order or request by a court, authorising body or other governmental body, or as otherwise required by law, legal process or for the prevention or detection of a crime.

Choice Benefits does this to comply with law, regulatory requirements and best practices.

Updating Your Information

As part of our services to you, we are required to update the information you provide to Choice Benefits regularly. You are entitled to review the personal information Choice Benefits holds about you and may ask that we revise your personal information to ensure that it is current and correct.

Information Security

We use physical and technological security measures to protect your information both online and offline from unauthorised access and against illegal manipulation and processing, accidental loss and damage. We will preserve your information for a reasonable period of time or as required by law.

Updates to the Policy

Choice Benefits may update this policy from time to time. To the extent permitted by law, any changes to our privacy policy will be posted to our Website and will become effective upon posting.

SPECIFIC DISCLOSURES FOR THE EUROPEAN ECONOMIC AREA

(This section is effective from May 25, 2018)

This section applies to data processing activities of data subjects residing in the European Economic Area as well as, regardless of residence, the processing of any Personal Data in the European Economic Area. In the event there is a conflict between this section and other parts of the Privacy Policy, this section shall control with respect to residents of the European Economic Area.

“*Personal Data*,” for purposes of this section, means 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 or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“*Services*” means any of our products, services, or deliverables.

“*Site*” means any website operated and controlled by us.

Pursuant to the European Union General Data Protection Regulation (GDPR), we function in the capacity of a “processor” both for the Services we offer to our Clients.

Controller versus Processor

We may process certain Personal Data in order to maintain and provide the Services to our Clients, such as names, addresses, email addresses, and other contact information for designated Client representatives or personnel (“Client Relationship Data”). In addition, we may send marketing materials or communications to potential or existing Clients (“Marketing Activities”). For purposes of Client Relationship Data and Marketing Activities, we function as a “data processor” under GDPR. Our disclosures with respect to our processing of data as a data processor are set forth in this Privacy Policy.

1. HOW WE COLLECT AND USE PERSONAL DATA

We collect personal data only in relation to services delivered and this will be undertaken by telephone, email, surface mail and secure messaging only.

2. HOW WE DISCLOSE PERSONAL DATA

Our disclosure is limited to circumstances where we are permitted to do so under applicable European and national data protection laws and regulations. We share data with certain types of companies, for

purposes of providing Services to Clients and existing Clients, such as insurers and other service providers.

3. LEGAL BASIS FOR PROCESSING

We collect and process your Personal Data for a variety of different purposes which are set out in further detail in this section.

3.1. PROCESSING PERSONAL DATA WHERE CONSENT NOT REQUIRED

In certain cases, separate consent is not required, including:

- For the performance of a contract.
To perform our contractual obligations to you, including our fulfilling orders or requests you have made, contacting you in relation to any issues with your order or use of our Services, or where we need to provide your Personal Data to our service providers related to the provision of the Services.
- To comply with legal obligations.
To comply with laws, regulators, court orders, or other legal obligations, or pursuant to legal process.
- Legitimate Interests.
To operate our business and provide our Services (other than in performing our contractual obligations to you) for our “legitimate interests” and for the purposes of applicable law, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Legitimate interests may include:
 - To communicate with you regarding the Services, including to provide you important notices regarding changes to our operations and to address and respond to your requests, inquiries, and complaints.
 - For our direct marketing purposes.
 - To assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties.
 - To develop, provide, and improve our Services.
 - To enforce our Terms of Business, or this Privacy Notice, or agreements with third parties.

3.2. CONSENT FOR PROCESSING

Choice Benefits do not actively market to our clients and where this strategy changes we will make contact with you and advise of this before gaining your consent. You have the option to opt out of all such activities should they be considered in the future.

4. DATA SUBJECT RIGHTS

You have the right in certain circumstances to request confirmation from us as to whether or not we are processing your Personal Data in our capacity as a Controller. Where we are processing your Personal Data as a Controller, you also have the right to request access to, modification of, or deletion of such Personal Data.

You also have the right in certain circumstances to receive the Personal Data concerning you that you provided to us, to restrict processing of your Personal Data, or to transmit such data to another controller.

To exercise your rights with respect to your Personal Data, please contact us at enquiries@choicebenefits.co.uk

5. DE-IDENTIFIED OR ANONYMISED DATA

We may create de-identified or anonymous data from Personal Data by removing data components (such as your name, email address, or linkable tracking ID) that makes the data not personally identifiable to you or through obfuscation or through other means. Our use of anonymised data is not subject to this Privacy Notice and will be used for regulatory reporting purposes.

6. DATA RETENTION

We will retain your Personal Data for as long as you remain a Client or an employee of a Client, or as otherwise legally necessary. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, comply with applicable industry standards, and in accordance with disaster recovery procedures.

7. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

You may have a right to lodge a complaint with a supervisory authority.

8. CONTACT US

For questions regarding this Privacy Notice, please contact us at: enquiries@choicebenefits.co.uk