

PRIVACY POLICY

Kensington Insurance Brokers Limited

(trading as Chelsea Insurance Brokers & Mayfair Insurance Brokers)

How we collect, process and retain your private data.

1. Introduction -The General Data Protection Regulations.

On the 25 May 2018, The General Data Protection Regulations (GDPR) come into effect.

These regulations enforce strict conditions on how private information is collected, used and retained by businesses and other organisations.

The way data breaches are reported and handled will change and the new legislation will require all firms to report breaches to the Information Commissioner's Office (ICO) - who are responsible for policing the GDPR - within 72 hours of having awareness of them taking place.

Non-compliance and serious infringements can lead to significant financial penalties and other remedies.

2. Our Operating Businesses:

Kensington Insurance Brokers and the trading names Chelsea Insurance Brokers and Mayfair Insurance Brokers (hereinafter "Kensington")

Kensington are authorised and Regulated by the UK Financial Conduct Authority (firm registration number 445714).

Kensington recognise the sensitive nature of privacy in the personal lines business and we believe protecting the confidential nature of every client or prospect's personally identifiable information ("Personal Information") is our paramount responsibility.

Accordingly, and in order to comply with various privacy laws, Kensington has developed this Privacy Policy to alert clients and prospects on how we may collect, use and disclose Personal Information.

Personal Information includes any factual or subjective information about an identifiable individual, such as name, age and address.

Personal Information does not include the name, title, business address or business telephone number of an employee of an organization.

3. Why We Collect and Disclose Personal Information

Quotation/Inception

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- Establishing a client relationship, including fraud, anti-money laundering and sanctions checks.
- Checking credit where we are taking any credit risk
- Evaluating the risks to be covered and matching to appropriate insurer, policy and premium

Policy Administration

- General client care, including communicating with clients.
- Collection or refunding of premiums, paying on claims, processing and facilitating other payments
- Facilitating premium finance arrangements

Claims processing

- Managing insurance claims
- Defending or prosecuting legal claims
- Investigating and prosecuting fraud or possible criminal offences

Renewals

- Contacting you in order to arrange the renewal of the insurance policy

Throughout the insurance lifecycle

- Marketing analytics, sending marketing materials and communications including data de-identification and/or aggregation
- Carrying out customer satisfaction surveys
- General risk modelling
- Analytics include the de-identification of personal data for the purposes of analytics
- Complying with our legal or regulatory obligations

Consultancy activities

- General client care, including communications with clients
- General risk modelling in the context of our consultancy services in order to evaluate risks and provide advice
- Analysis as part of the specific consultancy advice
- Complying with our legal or regulatory obligations in the context of our consultancy business.

Website activities

- To communicate with you regarding any queries you raise via the website

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- To monitor your interaction with the website to ensure service quality, compliance with procedures and to combat fraud
- To ensure the website content is relevant and presented in the most effective manner for you and your device

4. What Information We Collect

We may collect a variety of information in the performance of risk management and insurance services including but not limited to information clients provide on application forms, telephone enquiries and proposals.

5. How We Collect Personal Information

The Personal Information we collect comes directly from our clients and prospects. We use no third-party sources. Communication maybe through emails, our web site or telephone.

We do not Use Website Cookies

We do not collect such information from internet-based collection tools such as tracking software and cookies. We do not use Cookies to track web traffic and visitors.

6. Consent

Your knowledge and consent of our collection, use and disclosure of your Personal Information is critical.

Kensington provides risk management and insurance services to corporate clients, institutional clients, and to individual or personal lines clients.

For corporate clients, express consent of individual employees is generally not feasible or necessary in most circumstances. Nevertheless, Kensington will rely upon your voluntary disclosure of any such Personal Information in applications or in other underwriting information as consent for our collection, use and disclosure of such Personal Information for the purpose of providing risk management and insurance services.

For personal lines clients, appointment of Kensington as the Broker of Record is your express agreement and consent to collect, use and disclose Personal Information for the purpose of providing risk management and insurance services. Please note that withholding or withdrawing consent for us to collect, use and disclose Personal Information may not allow Kensington to provide risk management and insurance services on your behalf.

By supplying the necessary information involving employees of commercial clients, the customer acknowledges that you are also in compliance with the Privacy Laws of your country.

7. Security of Personal Information

Any Personal Information we retain is secured by three types of safeguards: (1) physical measures, such as locked offices and filing cabinets, (2) technological safeguards, such as passwords, encryption and firewalls, and (3) organisational controls such as limiting access to Personal Information on a 'need-to-know' basis, training and confidentiality agreements.

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The specific types of safeguard utilised will depend upon the sensitivity, amount, extent of distribution, format of the information, and type of storage.

8. Accuracy of Personal Information

Kensington is committed to the accuracy of any Personal Information it collects, uses and discloses. As such, clients are requested to keep us informed about any changes to their Personal Information that may be material to the risk management and insurance services we provide.

Upon written request, and subject to certain legal restrictions, we will provide reasonable access to Personal Information to the individual to whom it refers. You have the right to request us to amend any inaccurate Personal Information.

All such Requests should be directed to our designated Privacy Officer who is responsible for ensuring compliance with this Privacy Policy.

8. Access to your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests. Your personal information will usually be provided to you electronically where possible. Where not possible, or where otherwise agreed, we will provide your personal information in writing.

All such Requests should be directed to our designated Privacy Officer who is responsible for ensuring compliance with this Privacy Policy.

9. The right to be forgotten

This right enables you to request the deletion or removal of your personal data where there's no compelling reason for us to keep using it. This is not an absolute right to erasure. We may have a right or obligation to retain the information, such as where we are under a legal obligation to do so or have another valid legal reason to retain it.

When can you request erasure?

Subject to the section below "When can we refuse erasure requests?", you have a right to have your personal data erased, and to prevent processing, where:

- the personal data is no longer necessary for the purpose it was originally collected/processed;
- you withdraw consent (where previously provided and required for us to process such data);
- you object to the processing and we do not have a legitimate interest in processing your personal data;
- we've been processing your personal data in breach of data protection laws; or
- the personal data has to be erased in order to comply with a legal obligation.

When can we refuse erasure requests?

The right to erasure does not apply where your information is processed for certain specified reasons, including for the exercise or defence of legal claims.

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More importantly, if we have to erase your data we are not able to provide you with insurance or our other products and services if we need to process the erased data in connection with their administration, management or provision.

Do we have to tell other recipients of your personal data about your erasure request?

Where we have provided the personal data you want to be erased to third parties, we need to inform them about your erasure request, so they can erase the personal data in question. We will take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

It may also be that the recipient is not required/able to erase your personal data because one of the exemptions above applies – see “When can we refuse erasure requests?”.

10. Further Information, Complaints or to Withdraw Consent

To gain access to your Personal Information, for further information, to file a complaint about our handling of Personal Information, or to withdraw your consent for us to collect, use and disclose your Personal Information, please contact our

Privacy Office - Kristina Indienko

T 0207 937 9092 email kristina@kensington-insurance.com

Alternatively contact our Chief Compliance Officer Nick Thurston

nick@kensington-insurance.com

We will comply immediately with your request.

11. How long do we keep your data.

Our data retention policy ensures that we only retain personal data for the amount of time necessary in order to conduct our business. Each category of personal data has a varying retention period attributed to it dependant on the purpose of collection. A brief summary of this can be seen below;

- ❖ Insurance Quotations: 24 months
- ❖ Insurance Policies: Indefinitely
- ❖ Marketing: 24 months
- ❖ Claims: Indefinitely
- ❖ Finance Arrangement: Indefinitely
- ❖ Non-Successful Job Applications: 3 months
- ❖ Employee Details: Indefinitely

12. Sending your data outside the EEA

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To deliver services to you, it may sometimes become necessary for us to share your personal data outside the European Economic Area (EEA), eg:

- with insurers outside the EEA in the interest of better or faster service;
- with a service provider (eg a firm of loss adjusters) located outside the EEA, if their services are necessary;

These transfers are subject to special rules under European and UK data protection law. We will only transfer your personal data outside of the EEA where you have consented to this, or there is another legal basis on which we are entitled to make the transfer.

If you would like to make a request for your data not to be transferred to certain countries please contact our privacy officer, Kristina Indienko. T 0207 937 909 kristina@kensington-insurance.com

Or our Chief Compliance Officer Nick Thurston nick@kensington-insurance.com

Caution

While we make every effort to secure information within our control, no method of delivery is absolutely secure and any communication may be accidentally or deliberately intercepted by third parties.