

A close-up photograph of a laptop keyboard with a prominent green key in the center that reads 'Website Privacy' in white text. The surrounding keys are dark grey with white characters.

# Website Privacy Statement

Version 1.0  
15 October 2021

# Website Privacy Statement

Your Personal Information will be held by Connect Administration Ltd, for the purpose of the EU General Data Protection Regulation (GDPR).

Connect Administration Ltd is the Processor of personal data relating to the individuals within its Authorised Principles (ITC Compliance Ltd) network of Appointed Representatives, for the purposes of monitoring and meeting regulatory requirements for the Financial Conduct Authority, relationship management, marketing and business development. This statement relates to this data only.

## Personal Data We Process

Connect Administration Ltd processes your personal data, including information provided in various ways. Some of this data may be collected directly from you, including:

- Through the use of our Authorised Principles' Appointed Representatives services, in emails, during recorded telephone calls and conversations or when using our websites or services.

Some personal data may also be gained indirectly, such as:

- Information gained through other organisations in the course of ensuring the information we have is factual and correct.
- Information we gather from the use of, and interaction with, our website and the devices you use to access them, using technology such as cookies.

The data that we collect will depend upon our interactions with you and the privacy settings and features that you choose. The personal data we normally collect includes names, surname, date of birth, occupation, vehicle information, convictions and financial information and contact details such as address', phone numbers and email address'.

The table below sets out further details on the ways in which we will use your data.

Personal Data Category	Example Data Fields	Legal Basis for Processing	How we collect this data
Personal Identifiable Information	Name, Surname, Date of Birth, Job titles/roles, Company name, Descriptions (containing ad-hoc information such as biographies, previous names etc.), Vehicle information, Criminal convictions, Financial status, and Cookies strings.	<p>Legal Obligations: For meeting regulatory requirements as laid down by the Financial Conduct Authority.</p> <p>Legitimate Interests: For evidential purposes to manage and maintain records of client relationships and communications.</p>	<p>Directly from you: You may have voluntarily provided some of this information during the course of our interactions with you, or with your vehicle provider, or you may have provided it by filling in required information into our systems or forms online.</p> <p>Indirectly from you: We may obtain some of this information from referrals, from third parties or publicly available information.</p> <p>Passively from you: Your IP address and cookies are passively provided by your computer when you access our website.</p>

Contact Information	Phone numbers, email address', work mobile numbers, address' and vehicle garaging locations.	<p>Legal Obligations:</p> <p>For meeting regulatory requirements as laid down by the Financial Conduct Authority.</p> <p>Legitimate Interests:</p> <p>For evidential purposes to manage and maintain records of client relationships and communications.</p>	<p>Directly from you:</p> <p>You may have voluntarily provided some of this information during the course of our interactions with you, or with your vehicle provider, or you may have provided it by filling in required information into our systems or forms online.</p> <p>Indirectly from you:</p> <p>We may obtain some of this information from referrals, from third parties or publicly available information.</p>
Digital Communications Interaction (websites, associated platforms and email)	Date and times of forms completed, downloaded content, pages visited and duration, emailed opened / clicked, referral sources, search requests, opt-in / opt-out of email marketing. Some of this data is being obtained using cookies.	<p>Legal Obligation:</p> <p>For meeting regulatory requirements as laid down by the Financial Conduct Authority.</p> <p>Legitimate Interests:</p> <p>Where the processing enables us to enhance, modify, personalise or otherwise</p>	<p>Directly from you:</p> <p>You may have voluntarily provided some of this information during the course of our interactions with you, or with your vehicle provider, or you may have provided it by filling in required information into our systems or forms online.</p>

		<p>improve our services and communications for the benefit of our customer.</p> <p>Legitimate Interests: To better understand how people interact with our website and content in order to enhance the customer experience.</p>	<p>Passively from you:</p> <p>Your IP address and cookies are passively provided by your computer when you access our website.</p>
Complaints, Management, Surveys, Feedback and Questionnaires.	These are specific to complain.	<p>Legal Obligation:</p> <p>For meeting regulatory requirements as laid down by the Financial Conduct Authority.</p>	<p>Directly from you:</p> <p>You may have voluntarily provided some of this information by completing an information request.</p>

## Our Legal Basis for Processing Personal Data

Connect relies upon our legal obligation or legitimate interest bases for processing the personal data obtained from the practices outlined in the Personal Data We Collect table above.

### Legal Obligation

In most cases we will process your personal data to enable us to comply with our obligations to the Financial Conduct Authority when acting as a third-party administrator.

### Legitimate Interest

‘Legitimate Interest’ means the interests of our company in conducting and managing our business to enable us to give you the best services and experience. For example, we have an interest in making sure our services are relevant for you, and so we may process your

personal data to contact you by telephone with discussions regarding your product and / or cover.

When we process your personal information for our legitimate interests, we make sure to consider the balance and any potential impact on you (both positive and negative) and your rights under the data protection regulation. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Our legitimate business interests may include some or all of the following:

- For evidential purposes to effectively manage and maintain records of our relationships/communications with you,
- To enhance, modify, personalise or otherwise improve our services and communications for the benefit of you,
- To understand how you interact with our website and contact in order to enhance your customer experience.

## **Recipients of Personal Data**

Connect shares your data with ITC Compliance Ltd, being the provider of our administration systems and compliance services. They may also share this information with other third-parties. You will need to refer to their Privacy Notice for full information on who they share their information with. You can find it here – <http://itccompliance.co.uk/privacy-statement.php>

## **Retention Period**

Connect Administration Ltd will only keep your personal data for as long as necessary for the purposes for which it was gained. Personal data will be retained for the purposes of direct marketing, relationship management and business development, or where we have another legal basis for processing (such as your consent or a contract with you). Connect will review the personal data we hold periodically to check for accuracy and relevancy and to ensure that we continue to have a legal basis for processing. If the personal data is no longer necessary, or where we no longer have the legal basis for processing, we will delete or fully anonymise the data we hold on you, in line with our GDPR Policy. If your data becomes inaccurate, we will update it accordingly.



## Complaints

Connect Administration Ltd will be more than happy to help you should you have any complaints about the processing of your personal data. Under the GDPR, you have the right to lodge a complaint with the Supervisory Authority, the Information Commissioner's Office (ICO), who are the national authority responsible for the protection of personal data. A complaint can be made to the ICO via their website: [ico.org.uk](https://ico.org.uk) or through their helpline: 0303 123 1113.

## Changes to this Privacy Statement

We reserve the right to change this statement. Changes will be published on our website (INSERT WEBSITE LINK) and previous versions will continue to be available upon request.

## Document Change Control

Date of Issue / Latest Update	Version No.	Brief Description of Change (e.g., sections altered and reasons).
15/10/2021	v1.0	First Issue