

CHERRY GODFREY PRIVACY AND DATA POLICY

PRIVACY & DATA POLICY

This is the privacy policy of the website of Cherry Godfrey Holdings Limited and its subsidiary companies.

COLLECTING INFORMATION

Our website requests and collects certain personally identifiable information such as name, address, phone number and e-mail address through various means, including Site registration, surveys, games, questions, comments and communications to the Site, and postings to chat and bulletin areas, if any.

COOKIES

"Cookies" are pieces of information that are placed on an individual's computer hard drive to enable the individual to more easily communicate and interact with the Site. We may use cookies to customize your experience on the Site. We may also use cookies to record how many times a user has visited our Site and what pages the user has accessed. You may, however, disallow receiving cookies at any time through your web browser. It is not our intention to use cookies to retrieve information that is unrelated to our Site or your interaction with our Site.

RETARGETING COOKIE STATEMENT

Cherry Godfrey use cookies, pixels, and other technologies (collectively, "cookies") to recognise your browser or device, learn more about your interests, and provide you with essential features and services and for additional purposes, including:

- Recognising you when you visit use our services. This allows us to provide you with product recommendations, display personalised content, recognise you as an ideal customer, to provide other customised features and services on our website.
- Keeping track of your specified preferences. This allows us to honour your likes and dislikes, such as whether or not you would like to see interest-based ads. Conducting research and diagnostics to improve www.cherrygodfrey.com 's content, products, and services.
- Preventing fraudulent activity.
- Improving security.
- Delivering content, including ads, relevant to your interests on www.cherrygodfrey.com sites and third-party sites. (DATA INVENTORY STATEMENT: Facebook, Instagram, Google)
- Reporting. This allows us to measure and analyse the performance of our services.

Our website retargeting cookies allow you to take advantage of some of our website's essential features.

Approved third parties may also set cookies when you interact with our services. Third parties include search engines, providers of measurement and analytics services, social media networks, and advertising companies. Third parties use cookies in the process of delivering content, including ads relevant to your interests, to measure the effectiveness of their ads, and to perform services on behalf of us.

You can manage browser cookies through your browser settings. The 'Help' feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, how to disable cookies, and when cookies will expire. If you disable all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some features and services may not work.

See our Privacy Notice for more information about the types of information we gather.

IP ADDRESS

We may collect your IP (Internet Protocol) address to help diagnose problems with our server, and to administer our Site. An IP address is a number that is assigned to your computer when you use the Internet. This information does not contain any personally identifiable information about you. Your IP address is also used to help identify you during a particular session and to gather broad demographic data.

GENERAL DATA PROTECTION REGULATION (GDPR)

The Board of Cherry Godfrey has considered and adopted the following procedure across the Group's Companies. The responsibility of updating the Board on developments within GDPR rests with the Risk Committee /Data Protection Officer.

Note, this procedure replaces any previous versions.

Cherry Godfrey officers and staff will treat all information received from clients and third parties in accordance with The GDPR Regulations.

DATA PROCESSING DEFINITION

Processing means 'any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.' In other words, anything we do in relation to holding or using customer information.

DATA CONTROLLER is the trading company for which the data is being collected, ie all Cherry Godfrey Group Companies.

DATA PROTECTION OFFICER is Nick de Carteret

THE PURPOSE FOR COLLECTING DATA

The prime purpose of Data collected by Cherry Godfrey is it's use in the application, provision and management of financial product lines. The company consider that the Processing is necessary for the performance of a contract with you the "data subject" or to take steps to enter into a contract with you. Data is collected to ensure that we understand your needs and to enable us to provide you with a quality service, and in particular for the following reasons:

To establish Internal records, for the provision of our business operations and services.

To maintain records in order that both Regulatory and Legal responsibilities can be met without undue delay.

To safeguard the rights of individuals with regard to personal information which may be held, stored or processed about them.

To ensure that appropriate information is processed and retained in accordance with practices defined by the Information Commissioner.

To ensure that data will only be disclosed to appropriate parties.

We may send promotional emails about new services, special offers or other information which we think you may find relevant using the email address which you have provided.

CONSENT TO HOLD DATA

Consent must be freely given, specific, informed, unambiguous and must be verifiable.

This means that some form of record must be kept of how and when consent was given.

Individuals have a right to withdraw consent at any time.

Cherry Godfrey will ensure consent is provided by the following means:

Online Applications – the applicant will be directed to our “Terms and Conditions” information which includes a copy of the company GDPR procedure. You will then be asked to confirm your permission to continue based upon the conditions set out in the document by your completion of tick box.

On acceptance of the conditions, the data will be forwarded from your browser and processed in accordance with the type of application in question. Should you be unwilling to share the data at this point, the application will not be forwarded from your browser and you are free to discard without further interaction with Cherry Godfrey.

Clients can provide consent by one or more of the following actions:

1. The completion of the acceptance section within a web form
2. the completion of the acceptance section of a printed policy statement
3. the provision of verbal agreement which will be documented in the relevant database
4. the completion of the related transaction by payment of the premium or instalment.

YOUR RIGHTS UNDER THE LAW

THE RIGHT OF ACCESS

Individuals have the right to access all the personal data stored on them.

There will be no fee for the first copy of information. A fee may be charged if the individual asks for a copy to be sent to another interested party.

A request for personal data must be responded to within one month.

THE RIGHT TO RECTIFICATION

If individuals finds inaccuracies in their personal data they can ask to rectify it.

THE RIGHT TO ERASURE

Individuals have the right to request their personal data to be erased without undue delay.

Instance where erasure of data would be appropriate:

- *If the personal data is no longer necessary in relation to the purposes for which they were collected.*

Instance where erasure of data would not be appropriate:

- *where the erasure of the data may be in breach of regulatory or legal obligations of the controller.*

THE RIGHT TO PREVENT DIRECT MARKETING

Individuals have the right to be excluded from any direct marketing.

Advertising. We use information such as your interactions with www.cherrygodfrey.com's content, or services to display interest-based ads for features, products, and services that might be of interest to you. We do not use information that personally identifies you to display interest-based ads.

THE RIGHT TO DATA PORTABILITY

Individuals have the right to personal data concerning him or her which he or she has provided to a controller and transmitted to another controller. ie. To another financial services provider

CONTROLLING YOUR PERSONAL INFORMATION

You may choose to restrict the collection or use of your personal information in the following ways:

- We will only collect your data on our website contact form where you specifically agree to our terms of business.
- Cherry Godfrey utilise email and SMS marketing and credit control tools for the purposes of client communications, and where used, we always include an ability to unsubscribe your email address from any ongoing marketing communications.
- If you believe Cherry Godfrey hold any personal data about you, you are welcome to send us a written "Subject Access Request" to request details of this data. We will require you provide comprehensive proof of your identity before releasing any information.
- If you require this personal data to be Deleted / Anonymised / Archived / Updated or Altered in any other way, you should include this in your written request. Cherry Godfrey will be happy to comply where our regulatory, statutory and commercial rights and responsibilities will not be compromised.
- We are only able to respond to "Subject Access Requests" where these are received in writing and sent to our postal contact address on our Contact Page.

We will not distribute personal information to third parties unless we are explicitly required to do so to fulfill a commercial request, under IT Hosting arrangements, by law, or for accounting or regulatory purposes.

DATA TYPES HELD

Data collected and retained comes under the following categories:

Personal data

Banking data

Financial history

Credit history

Insurable risk data

Insurance claims history

Underwriting notes

Insurance notes

Credit control notes

Conversations between clients and personnel

Public data

It is considered that each of these data categories are required to fulfil the contractual obligations of both the client and the company.

DATA RECIPIENTS

The client

Group Companies

IT Hosting Platforms

Credit Reference Agencies

Payment Gateway Providers

Regulatory Authorities (including Police, Customs, FIS)

Ombudsman

Auditors

Suppliers of services

Financial Organisations

Debt Collecting, Tracing and Private Investigators

An organisation processing data on behalf of the company

Facebook Inc

Instagram Inc

Google

Transfers out of the European Economic Area. Whenever we transfer personal information to countries outside of the European Economic Area in the course of sharing information as set out above, we will ensure that the information is transferred in accordance with this Privacy Notice and as permitted by the applicable laws on data protection.

CREDIT REFERENCE AGENCIES (CRA's)

In order to process your application we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity.

We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The identities of the CRAs we share data with and the ways in which they use and share personal information, are explained in more detail at:

Call Credit: www.callcredit.co.uk/crain

Equifax: www.equifax.co.uk/crain

Experian: www.experian.co.uk/crain

Channel Island Data Services: www.cidsltd.com

DATA RETENTION PERIODS

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

It should be noted that records linked to financial transaction are subject to retention rules published from time to time by regulatory authorities and under accounting standards rules. Currently the minimum retention period under these requirements is six years.

In addition, application records are required to be retained in order to ensure Anti Money Laundering / Combatting the Funding of Terrorism (AML/CFT) reporting can be maintained.

The retention period should be measured from the date of application where there is no corresponding business written or where business is written, from the date of the completion of the product.

Customer Information - 6 years after the completion of the last product provided.

Loan Application Data - 6 years after the completion of the agreement.

Insurance Application Data - 6 years after the completion of the policy.

Life/Mortgage Application Data - 6 years after the completion of the related mortgage.

Investment Business data - 10 years after the completion of the product (Jersey rule)

Application not leading to the sale of a product – 6 years.

HR Data – 6 years after the leave date of the employee.

Payroll Data – 6 years after the leave date of the employee.

Job application Data (unsuccessful candidate) – 3 months following the fulfilment of the position.

Employers Liability Insurance policy data must be retained for a minimum period of 10 years, consequently for these policy types, all data will be retained accordingly.

At the completion of the retention period, all data will be purged.

SENSITIVE PERSONAL DATA

Personal data consisting of the following information is deemed to be of a sensitive nature and Cherry Godfrey will not enquire or retain information relating to these:

- (a) the racial or ethnic origin of the data subject;
- (b) his/her political opinions;
- (c) his/her religious beliefs or other beliefs of a similar nature;
- (d) whether he/she is a member of a trade union;
- (e) his/her sexual life;

Note, it is necessary in some cases to record medical history in relation to travel and medical insurance plans. Where this is the case, records will be retained in accordance with the above retention policies.

DATA RELATING TO CHILDREN

Whilst it may be necessary to collect data relating to children, ie in the case of a family travel insurance policy, information must be provided by the parent or guardian. Under no circumstance may a member of staff enter into direct dialogue with a child or minor.

For the avoidance of any doubt, in this context we treat any persons under the age of 16 years as a child.

SECURITY

We are committed to using our best endeavours to ensure that your information is secure. All information transferred between your browser and our website or third party applications are encrypted using HTTPS protocol, using Digital Certificates with secure TLS Cyphers. This can be verified by looking for the secure padlock symbol in the browser address bar.

In order to prevent un-authorised access or disclosure, we have put in place further physical, electronic and managerial procedures to safeguard and secure the information we collect. These policies and procedures are company confidential, to avoid exposure of this data security, so can only be made available to relevant parties legally bound by a non-disclosure agreement.

REGISTRATION

It is the responsibility of the Board of Directors of the Company to ensure that registration is maintained with the Data Protection/Information Commissioner, declaring the purposes for which the information is being held or processed, to whom it will be disclosed and the security to be applied.

It is the responsibility of all staff members to ensure that any use of personal data in the course of their work is treated in accordance with the Data Protection Principles.

ADVERTISING - MARKETING

We use information such as your interactions with www.cherrygodfrey.com's content, or services to display interest-based ads for features, products, and services that might be of interest to you. We do not use information that personally identifies you to display interest-based ads.

CONSENT TO PROCESSING

By providing any personal information to this Site, you confirm that you fully understand and unambiguously consent to the transfer of such personal information to, and the collection and processing of such personal information in, the United Kingdom other countries or territories.

LINKS

Our Site may contain links or references to other Web sites outside of our control. Please be aware that we have no control over these sites and our privacy policy does not apply to these sites.

ACCESS

If you would like to review and/or update the information that you have provided to the Site, please send an e-mail to dataprotection@cherrygodfrey.com requesting such access or change.

CHOICE/OPT-OUT

You may choose to have your name taken off Cherry Godfrey's e-mail marketing list by sending an e-mail to marketing@cherrygodfrey.com with the subject line "Unsubscribe" or by following instructions provided in any e-mail message from Cherry Godfrey.

YOUR ACCEPTANCE OF THIS POLICY

By using our Site, you signify your acceptance of our Privacy and Data Policy. If you do not agree to this policy, please do not use our Site. We reserve the right, at our discretion, to change, modify, add, or remove portions from this policy at any time so visitors are encouraged to review this policy from time to time. Your continued use of our Site following the posting of changes to these terms means you accept these changes.