# **Privacy Policy**

# How we use your information

We are committed to protecting your privacy. This privacy notice tells you what to expect when Highway Assurance Ltd collects personal information. It applies to information we collect about:

- visitors to our websites;
- complainants and other individuals in relation to an enquiry;
- people who use our services;
- job applicants;
- current and former employees.

We use information held about you in the following ways:

- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- to carry out our obligations arising from any contracts entered into between you and us;
- to notify you about changes to our service;

If you are an existing Customer, we will only contact you by electronic means with information about goods and services similar to those which were the subject of a previous sale to you or our customer.

We do not disclose personal information about individuals to advertisers or sell your information to any other organisation for marketing purposes.

#### Visitors to our websites

When someone visits <a href="http://highwayassurance.co.uk">http://highwayassurance.co.uk</a> we do not make any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

#### People who email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

### People who make a complaint

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide.

We will keep personal information contained in complaint files in line with our policy. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

# People who enquire with us

Where enquiries are submitted to us, we use the information supplied to process the enquiry.

We will not share any personal data received through this method with 3rd parties.

### People who use Highway Assurance Ltd services

Highway Assurance Ltd offers various services to the public.

We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have subscribed to any of our services to carry out a survey to find out if they are happy with the level of service they received.

When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this. We do not store financial details of our clients (credit or debit card numbers).

# Job applicants, current, and former Highway Assurance Ltd employees

When individuals apply to work at Highway Assurance Ltd, we will only use the information they supply to us to process their application. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing them beforehand unless the disclosure is required by law.

Once a person has taken up employment with Highway Assurance ltd, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment with Highway Assurance Ltd has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

### Disclosure of personal information

In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the organisation or individual concerned and with other relevant bodies.

There are also circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics.

# **Access to personal information**

Highway Assurance Ltd tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the General Data Protection Regulation. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information.

To make a request to Highway Assurance ltd for any personal information we may hold, you need to put the request in writing and either address it to us at the address provided below or email us.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting us.

As an individual, if you have issues accessing your personal information with any organisation you have the right to lodge a compliant with the ICO.

#### Your Rights as a Data Subject:

Right to Rectification - the right to request us to rectify inaccurate personal data.

Right to Object - the right to object to processing based on either public interests or legitimate interests. Processing must stop, unless we demonstrate compelling grounds for continuing the processing or that the processing is necessary in connection with our legal rights.

Right to Object to Direct Marketing

Right to be Forgotten - the right to have us erase personal data without undue delay. Contingent on the occurrence of one of the following: - The data is no longer necessary; - You withdraw your consent (where consent is our legal basis for processing); - We have no overriding grounds for continuing processing against the objectification; - Processing was unlawful; - Erasure is necessary with EU or national law.

Right to Restrict Processing - the right to have us restrict processing if: - The accuracy of the data is contested; - Processing is unlawful; - We no longer need the data for its original purpose, but need it for legal purposes; - Erasure is pending.

Right of Data Portability - the right to receive a copy of your data in a commonly used machine-readable format for transfer to another controller. This will either be in .xls or .csv format.

Highway Assurance ltd neither makes a decision solely by automated means without any human involvement nor engages in automated processing of personal data to evaluate certain things about an individual. Hence your right related to automated decision-making including profiling does not apply with us.

Any formal subject access request should be made in writing to the address below. This will be provided free of charge. However, we may charge a reasonable fee for repetitive, unfounded, or excessive requests or additional copies.

#### **Retention & Deletion**

Highway Assurance Ltd retains your information while you or your company remains an active client, unless you ask us to delete your information. If you stop being an active client, we will retain your information for a period unless you request that your details be deleted. However, we will only contact you if we believe the information, we intend to send to you could be of 'legitimate interest' to you or your company.

Subject to applicable law, Highway Assurance ltd may retain information after account deletion:
- If there is an unresolved issue relating to your account, such as an outstanding invoice on your account. - If necessary, for its legitimate business interests, such as fraud prevention. - If we are required to by applicable law; and/or in aggregated and/or anonymised form.

### **Complaints or queries**

Highway Assurance Ltd tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Highway Assurance ltd collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

#### Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

# Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 14<sup>th</sup> of May 2019

#### How to contact us

If you want to request information about our privacy policy you can email us or write to our Data Protection Officer at: Unit 6, Plummers Dell, Gipping Road, Great Blakenham, Ipswich, Suffolk, IP6 0JG