

## PRIVACY NOTICE

### 1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data and keep it safe.

We know that this is a lot of information, but we want you to be fully informed about your rights, and how the Insurance and Reinsurance Legacy Association Ltd ('IRLA', 'we', 'us' or 'our') uses your data.

We hope the following sections will answer any questions you have but if not, please do contact us. By telephone + 44 7464 113651. By email [secretariat@irla-international.com](mailto:secretariat@irla-international.com) By post Unit 8 Norfolk House, Williamsport Way, Lion Barn Estate, Needham Market, Suffolk IP6 8RW

It is likely that we will need to update this Privacy Notice from time to time and we recommend that you check it regularly.

### 2. What is the Insurance and Reinsurance Legacy Association Ltd?

IRLA is a not for profit mutual owned by its membership that operates as a trade body in the legacy re/insurance sector.

### 3. Explaining the legal bases we rely on

The law on data protection sets out several different reasons for which a company may collect and process your personal data, including:

#### i. Consent

In specific situations, we can collect and process your data with your consent. For example, when you tick a box on our website to receive email newsletters.

When collecting your personal data, we will always make clear to you, which data is necessary in connection with a service.

#### ii. Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you become a member of IRLA, we will collect your address details to issue invoices, send documentation or aggregate geographical membership data.

#### iii. Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting the association to law enforcement.

#### iv. Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business, and which does not materially impact your rights, freedom or interests. For example, we will use your engagement history to send you or make available personalised offers.

We also combine the engagement history of many members and non-members to identify trends and ensure we can keep up with demand or develop new products/services.

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#### 4. When do we collect your personal data?

- when you join the association and complete a membership form
- when you register for an event or training course
- when you attend an event or training course
- when you request to be subscribed to our database
- when a colleague refers you
- when you contact us by any means with queries, comments etc.
- when you ask one of our Partners to email you information about a service

#### 5. What sort of personal data do we collect?

- If you are a member: your name, billing/delivery address, email and telephone number. We do not keep any record, encrypted or otherwise of your login password.
- Details of your interactions with us through attendance at events.
- Copies of documents you provide to prove your corporate identity, status and place of work. The association will also credit check new members.
- Details of your training preferences.
- IRLA currently does not use information gathered using cookies in your web browser.
- Payment card information is not retained on any of our systems.
- Your comments and service reviews.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.
- Photographs of you at events or training courses

#### 6. How and why do we use your personal data?

We want you to have the best possible experience with us. One way to achieve that is to get the biggest picture we can of you by combining the data we have about you.

We then use this to offer you products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our members and potential members and providing the highest levels of service.

Of course, if you wish to change how we use your data, you will find details in the 'What are my rights?' section below. If you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you have asked for.

Here is how we will use your personal data and why:

- i. Your details may need to be passed to a courier to deliver a product or bill.
- ii. To respond to your queries, refund requests and complaints. Handling the information, you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this based on our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

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- iii. To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We will also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We will do all of this as part of our legitimate interest.
- iv. To process payments and to prevent fraudulent transactions. We do this based on our legitimate business interests. This also helps to protect our customers from fraud.  
Of course, you are free to opt out of hearing from us by any of these channels at any time.
- v. To send you relevant, personalised communications by regular emails in relation to updates, offers, services and products. We will do this based on our legitimate business interest.  
You are free to opt out of hearing from us at any time.
- vi. To send you communications required by law, or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- vii. To develop, test and improve the systems, services and products we provide to you. We will do this based on our legitimate business interests.
- viii. To comply with our contractual or legal obligations to share data with law enforcement.  
For example, when a court order is submitted to share data with law enforcement agencies or a court of law.
- ix. To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.  
Of course, you are free to opt out of receiving these requests from us at any time by updating your preferences in your online account.
- x. To process your booking/appointment requests.  
Sometimes, we will need to share your details with a third party who is providing a service (such as delivery couriers or a trainer). We do so to maintain our appointment with you. Without sharing your personal data, we would be unable to fulfil your request.

#### 7. How we protect your personal data

We know how much data security matters to all our contacts and we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites and apps using 'https' technology.

Access to your personal data is password-protected and is accessible by our contracted secretariat and IT suppliers only.

We regularly monitor our system for possible vulnerabilities and attacks, and we ensure that the latest updates are always current to further strengthen security.

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#### 8. How long will we keep your personal data?

Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

Some examples of customer data retention periods:

##### Directors

When you become a director, we will keep the data required by the bank and Company House/HMRC and all certified personal documents you give us for seven years, so we can comply with our legal and contractual obligations. Following any resignation all financial or contractual documents will be referred to lawyers for appropriate retention advice.

##### Membership

When you join IRLA, we will keep the personal data you give us for six years, so we can comply with our legal and contractual obligations. In the case of certain financial or contractual documents we will keep the data for 7 years.

##### Supplier

When you commit to a contract and/or service with us we will keep the personal data you give us for six years, so we can comply with our legal and contractual obligations. In the case of certain financial or contractual documents we will keep the data for 7 years.

#### 9. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties. For example, delivery couriers, IT and website technicians, for fraud management, to handle complaints, to help us personalise our services to you and so on.

##### **Here is the policy we apply to those organisations to keep your data safe and protect your privacy:**

- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected always.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

##### **Examples of the kind of third parties we work with are:**

- IT companies who support our website and other business systems.
- Operational companies such as delivery couriers.
- Credit agencies and Company House to verify your details given to us.

##### **We do not share your data with third parties for their own purposes:**

- However, for fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.

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- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- For further information please contact our Data Protection Officer (see section 11 below)

#### 10. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

If you are based outside the UK and book a service with us, we retain the personal data that we collect from you in the UK.

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA.

For example, this might be required to fulfil your order or provide support services.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow always. If you wish for more information about these contracts, please contact our Data Protection Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

#### 11 What are your rights over your personal data?

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct contact.
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You can contact us to request to exercise these rights at any time as follows:

To ask for your information please contact The Data Protection Officer, IRLA Ltd, Unit 8 Norfolk House,

Williamsport Way, Lion Barn Estate, Needham Market, Suffolk IP6 8RW or email [website@irla-international.com](mailto:website@irla-international.com)

To ask for your information to be amended please update your online account or contact Secretariat.

If we choose not to action your request, we will explain to you the reasons for our refusal.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

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Where we rely on our legitimate interest

In cases where we are processing your personal data based on our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

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## 12. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we cannot be responsible for the content of external websites).

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

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