

## **Straight Solutions Ltd Fair Processing Notice**

Please see below for details of Straight Solutions Fair Processing notice and confirmation of compliance re GDPR.

Last Update: 01/05/2018

Data Protection Officer / Data Controller: Brian Dunk

### **Statement of Compliance:**

- 1) Personal Data: We do hold and process personal data on behalf of our customers
- 2) Databases: We do NOT supply any databases or cross-sell other policies to our clients
- 3) We are based in the UK
- 4) Joint Processors:
  1. With the exception of insurance companies for whom we provide policy services there are no joint data processors.
- 5) Special categories of data: Given the broad nature of our service provision, dependent on your specific requirements, it is possible that we may be processing Special Categories of data on your behalf.
- 6) Data Security: We have appointed a Data Controller, who is responsible for ensuring that we are meeting the requirements of GDPR, and that measures are in place to minimise the risk of a data breach
- 7) In the unlikely event of a data breach, we have a documented process in place to;
  1. Notify the controller without undue delay
  2. Notify the ICO (if applicable)
- 8) Data Subject Rights: We have a documented policy and procedure for handling subject access requests (SARs) and we will assist you with any reasonable request to comply with the above.
- 9) Erasure and Rectification: We will delete or return personal data unless it is required by law to retain such personal data or has some other good and sufficient justification for retaining such personal data such as the regulatory requirements of The Financial Conduct Authority or the company records required by HMRC.
- 10) International data. With the exception of communicating with our policyholders who are based outside of the UK, no data is transferred outside of the UK. Only data relating to the customer's policy will be transferred and the only recipient will be the Customer's own insurance company.
- 11) Our insurance business partners (suppliers). We require the same high levels of compliance from our insurance company suppliers. We will ensure that all of our insurers who have potential access to any data covered by GDPR have confirmed their compliance. We will not provide access to any suppliers who are not able to comply.

