



# Data Privacy Policy

## Data Privacy Policy for Integra Technical Services

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## Contents

Data Privacy Policy .....	3
1. Who We Are.....	4
2. Data Protection Principles .....	4
3. The Personal Information We Collect and Use: Information Collected By Us.....	4
4. The Personal Information We Collect and Use: Information Collected From Other Sources .....	5
5. How We Use Your Personal Information .....	6
6. Who We Share Your Personal Information With.....	6
7. Where Your Personal Information May Be Held .....	7
8. How Long Your Personal Information Will Be Kept .....	7
9. Reasons We Can Collect And Use Your Personal Information.....	7
10. Transfer Of Your Information Out Of The EEA.....	8
11. Your Rights .....	8
12. Keeping Your Personal Information Secure .....	9
13. How to Complain .....	10
14. Changes to This Privacy Notice .....	10
15. Contact Information.....	11

## **Data Privacy Policy**

This Data Protection notice explains what personal data we hold about you, how we collect it, and how we use it. We are required to notify you of this information under the General Data Protection Regulation that entered into force on 24 May 2016 and should be applied by United Kingdom and EU Member States since 25 May 2018.

Please ensure you read this policy (sometimes referred to as a "privacy notice") and any other similar notice we may provide to you from time to time when we collect or hold personal data about you. This privacy notice contains important information on who we are, how and why we collect, store, use and share personal information, and your rights in relation to your personal data and on how to contact us and/or supervisory authorities in the event you have a complaint.

Personal data, also known as personally identifiable information ("PII"), is any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used for de-anonymizing anonymous data can be considered PII.

Where you provide personal data about another person this Privacy Notice will also apply to that data so please show it to that person. This Privacy Notice applies to any personal data which you may provide to us in person, over the telephone, by e-mail, on our website and/or by post. This Privacy Notice also applies to any personal data which we may collect from third parties about you and/or which we may collect when you access our website and/or in the course of our business relationship.

You can choose not to give any personal data. We may need to collect personal data by law, or under the terms of a contract and/or relationship that we have with you. If you choose not to give us the personal data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services and it may lead to a cancellation of a product or a service you have with us.

Wherever we refer to "processing" of personal data in this Privacy Notice this includes any combination of the following activities: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

This Privacy Notice only applies to personal data collected by or on behalf of Integra Technical Services or its affiliated companies. The company website may from time to time contain links to and from other websites. If you follow a link to any external website or alternatively reach



our website from a third-party website, please be aware that these websites will have their own privacy policies, separate from ours, and we therefore do not accept any responsibility or liability for these policies. Please check their policies before you submit any personal data to these websites.

## **1. Who We Are**

Integra Technical Services collects, uses and is responsible for certain personal data about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union and in the United Kingdom and we are responsible as a 'controller' of that PII for the purposes of those laws.

In this privacy notice, references to "we" or "us" means Integra Technical Services.

Integra Technical Services (ITS) UK Ltd is registered at Companies House in the UK, under company registration no. 03348439. Its affiliated companies include ITS Middle East, ITS North America and ITS Latin America.

Integra Technical Services Asia, Integra Technical Services Australia and Integra Technical Services New Zealand are registered under each local country's equivalent organisation.

## **2. Data Protection Principles**

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Privacy Policy compliant with GDPR:

- To keep your personal data safe and only process it for legitimate business reasons or on a valid legal basis
- To keep our records up to date and delete or correct inaccurate personal data
- Not to keep your personal data after the purpose has ended
- Not to sell your personal data

## **3. The Personal Information We Collect and Use: Information Collected By Us**

We may collect personal data from you in the following ways:

- When you make an enquiry and register your interest via our website
- When you contact us in person, over the telephone, by email or by post

- In customer surveys
- When you use our services

We may collect your personal data from third parties we work with including:

- Insurers
- Reinsurers
- Brokers
- Reinsurance Brokers
- Insurance Buyers
- Forensic Accountants
- Lawyers
- Other SMEs', consultants, experts, etc.

The type of information we may ask you to provide about yourself and therefore collect includes, but is not limited to:

For Integra Technical Services employees and contractors, the provision of Name, Date of Birth, Home Address, Telephone numbers, Emails, Bank Details, National Insurance No, Passport information, Emergency Contact Details, Employment Details and any other relevant information is required from you to enable us to perform our employment contract or heads of agreement with you.

For non-Integra Technical Services employees and contractors, the provision of Name, company name, office address, contact details (mobile and/or landline phone numbers), work e-mail address and any other relevant information to enable us to perform our service contract with you.

We will inform you at the point of collecting information from you, whether you are required to provide any of this information to us.

#### **4. The Personal Information We Collect and Use: Information Collected From Other Sources**

We also obtain personal information from other sources if legally or contractually required:

Name, company name, office address, telephone numbers, emails, financial details and any other relevant information.

## **5. How We Use Your Personal Information**

We will typically collect and use this information for the following purposes:

1. For the performance of a contract you have with Integra Technical Services
2. To respond to your enquiry
3. To send you information about our services, including any changes to the services we provide
4. To keep our records up to date
5. To develop and carry out marketing activities
6. To comply with laws and regulations that apply to us
7. To detect, investigate, report, and seek to prevent financial crime and fraud
8. To monitor customer satisfaction
9. To run our business in an efficient and legitimate way. This includes managing our financial position, business capability, planning, communications, corporate governance, regulatory compliance and audit.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

You can withhold or withdraw your consent at any time contacting our Data Protection Officer.

## **6. Who We Share Your Personal Information With**

We may share your personal data within our company including its affiliated companies outside the European Economic Area (“EEA”), and we may disclose it to third parties in certain circumstances for example to (Re)Insurers, (Re)Insurance Brokers, Insurance Buyers, Lawyers, Forensic Accountants, Other Experts, Services Providers, etc.

The information we might share the following categories of personal data:  
Name, Email Address, Company Name, Office Address, Telephone numbers.

Personal data may also be shared with the following categories of recipients, who are suppliers of services to Integra Technical Services:

Sage, HMRC, Sophos, Microsoft Office, outsourced IT company, etc.

This data sharing enables us to perform our business and contractual obligations.

Some of those third-party recipients may be based outside the EEA — for further information including on how we safeguard your personal data when this occurs, see “Transfer of your information out of the EEA”.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

## **7. Where Your Personal Information May Be Held**

Information may be held at our offices, on a company equipment, and by third-party service providers, as described above.

We have security measures in place to seek to ensure that there is an appropriate level of security for information we hold including those measures detailed in our GDPR Data Privacy Policy.

## **8. How Long Your Personal Information Will Be Kept**

We will hold Name, Date of Birth, Office Address, Home Address, Telephone numbers, emails, Bank Details, National Insurance No. for Staff, Emergency Contact Details, Employment Details and any other relevant information for at least 6 years or as applicable by law.

## **9. Reasons We Can Collect And Use Your Personal Information**

We rely on the legitimate interest for processing set out in GDPR Article 6.1 (b) “processing is necessary for the performance of a contract to which the data subject is party” as the lawful basis on which we collect and use your personal data. These reasons are:

- To fulfil a contract, we have with you or to take steps at your request prior to entering into a contract with you, or
- When it is our legal duty, or

- When there is a legitimate business interest or the legitimate interest of a third party except where such interests are overridden by your interests or your fundamental rights and freedoms, or
- When you consent to it.

A legitimate business interest is when we have a business or commercial reason to process your personal data, but this must not unfairly go against your rights and freedoms.

## **10. Transfer Of Your Information Out Of The EEA**

We may transfer your personal information to the following which are located outside the European Economic Area (EEA) as follows:

- USA in order to allow our email system and document management system to be backed up to the cloud
- Internally within Integra Technical Services and its affiliated companies, please refer “6. Who We Share Your Personal Information With”

Integra Technical Services is a cloud-enabled business, meaning that during the normal course of interacting with Integra Technical Services, your personal data may be stored outside of the EU. We only use Cloud services that have met the necessary standards such as ISO 27001 and the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks to protect and store your data.

Some countries do not have the same data protection laws as the United Kingdom and EEA. Whilst the European Commission has not given a formal decision that USA provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal information will be subject to and as permitted under GDPR Article 46 designed to help safeguard your privacy rights.

If you would like further information, please contact our Data Protection Officer. We will not otherwise share your personal information with any other third party unless specified in please refer “6. Who We Share Your Personal Information With”.

## **11. Your Rights**

Under the General Data Protection Regulation, you have a number of important rights free of charge. In summary, those include:

- the right to be informed about the collection and the use of their personal data

- the right to access personal data and supplementary information
- the right to have inaccurate personal data rectified, or completed if it is incomplete
- the right to erasure (to be forgotten) in certain circumstances
- the right to restrict processing in certain circumstances
- the right to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services
- the right to object to processing in certain circumstances
- rights in relation to automated decision making and profiling
- the right to withdraw consent at any time (where relevant)
- the right to complain to the Information Commissioner

In certain circumstances we may wish to process personal data and if GDPR allows us to do so we will inform you of our legal grounds unless the processing is ratified by GDPR Article 6(1) (b) or Recital 171.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please contact us at:

Integra Technical Services, 117 Houndsditch, London EC3A 7BT, UK; +44 (0) 20 3879 8320 or by email to [data.protection@integratechnical.com](mailto:data.protection@integratechnical.com)

Please let us:

- have enough information to identify you, your full name, address and property address,
- have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- know the information to which your request relates, including any account or reference numbers, if you have them

## **12. Keeping Your Personal Information Secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of

confidentiality, including non-disclosure agreement, data processing agreement or data use agreement where applicable.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you are logging into any of the Integra Technical Services online portals, it is your responsibility to protect your login details (your user name and password). You must treat these as confidential and must not share or disclose your login details to any other party.

We will retain your personal data for no longer than the period needed for the purposes that we collected the data and for as long as we have legal grounds to retain it. There is no fixed period after which all record of your personal data will be deleted as this will depend on the circumstances and the purposes of the initial data collection, but we will take steps and maintain policies to keep retention under proper review. We will not seek your consent before deleting any personal data.

### **13. How to Complain**

We hope that we can resolve any query or concern you raise about our use of your information. If you are not satisfied with how we have processed your personal data, you can contact us by writing to or emailing the Data Protection Officer at the email / office address given above.

The General Data Protection Regulation also gives you right to lodge a complaint with a Data Protection Authorities, in particular in the European Union (or European Economic Area) state where you work, live or where any alleged infringement of data protection laws occurred. Please refer to European Data Protection Board website for details of your local Data Protection Authority at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

### **14. Changes to This Privacy Notice**

This privacy notice was updated as of 1<sup>st</sup> May 2019.

Any changes we may make to this Privacy Notice in the future will be posted on the website and, where appropriate, you will receive a notification email.



## 15. Contact Information

For the purpose of GDPR, Integra Technical Services Data Protection Officer (DPO) contact details are as follows:

The Data Protection Officer,  
Integra Technical Services  
117 Houndsditch  
London  
EC3A 7BT

or email [data.protection@integratechnical.com](mailto:data.protection@integratechnical.com)