

February 2024

External Privacy Notice

(A) This Notice

Summary – This Notice

This Notice explains how we Process Personal Data. This Notice may be amended or updated from time to time, so please check it regularly for updates.

This Notice is issued by each of the Controller entities listed in Section (P) below (together, “**Clear**”, “**we**”, “**us**” and “**our**”) and is addressed to individuals outside our organisation with whom we interact, visitors to our Sites, other recipients or beneficiaries of our insurance services or any other services we provide, personnel of corporate customers, suppliers, and prospects, applicants for employment, and visitors to our premises (together, “**you**”). Defined terms used in this Notice are explained in Section (Q) below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Notice.

This Notice was last updated on February 2024

(B) Collection of Personal Data

Summary – Collection of Personal Data

We collect or obtain Personal Data: when those data are provided to us (e.g., where you contact us); in the course of our relationship with you (e.g., if you are an employee of a customer or supplier); when you make Personal Data public (e.g., if you make a public post about us on social media); when you visit our Sites; when you register to use any of our Sites or services; or when you interact with any third party content or advertising on a Site. We may also receive Personal Data about you from third parties (e.g., law enforcement authorities).

Collection of Personal Data: We collect or obtain Personal Data about you from the following sources:

- Data provided to us: We obtain Personal Data when those data are provided to us (e.g., where you contact us *via* email or telephone, or by any other means, or when you provide us with your business card, or when you submit a job application).
- Data we obtain in person: We obtain Personal Data during meetings, during visits from sales or marketing representatives, or at events we attend.
- Relationship data: We collect or obtain Personal Data in the ordinary course of our relationship with you (e.g., we provide a service to you, or to your employer).
- Site data: We collect or obtain Personal Data when you visit any of our Sites or use any features or resources available on or through a Site.
- Registration: We collect or obtain Personal Data when you use, or register to use, any of our Sites or services.
- Content and advertising information: If you interact with any third party content or advertising on a Site (including third party plugins and cookies) we receive Personal Data from the relevant third party provider of that content or advertising.
- Third party information: We collect or obtain Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; etc.).

(C) Creation of Personal Data

Summary – Creation of Personal Data

We create Personal Data about you (e.g., records of your interactions with us).

We also create Personal Data about you in certain circumstances, such as records of your interactions with us. We may also combine Personal Data from any of our Sites or services, including where those data are collected from different devices or sources.

(D) Categories of Personal Data we Process

Summary – Categories of Personal Data we Process

We Process: your personal details (e.g., your name); your contact details (e.g., your address); your professional details (e.g., your CV); records of surveys or testing in which you have participated; demographic data (e.g., your age); visitor logs for our premises; records of your consents; payment details (e.g., your billing address); information about our Sites (e.g., the type of device you are using); details of your employer (where relevant); information about your interactions with our content or advertising; and any views or opinions you provide to us.

We Process the following categories of Personal Data about you:

- Personal details: given name(s); preferred name; and photograph.
- Contact details: correspondence address; telephone number; email address; details of Personal Assistants, where applicable; messenger app details; online messaging details;.
- Correspondence: records and copies of your correspondence if you contact us.
- Professional details: your CV; records of your expertise; professional history; practising details and qualification details; information about your experience; participation in meetings, seminars, advisory boards and conferences; information about your professional relationship with other individuals or institutions; language abilities; and other professional skills.
- Demographic information: gender; date of birth / age; nationality; salutation; title; and language preferences.
- Visitor logs: records of visits to our premises.
- Consent records: records of any consents you have given, together with the date and time, means of consent, and any related information (e.g., the subject matter of the consent).
- Payment details: invoice records; payment records; billing address; payment method; bank account number or credit card number; cardholder or accountholder name; card or account security details; card 'valid from' date; card expiry date; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of cheques.
- Data relating to our Sites: device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; registration details; username; password; security login details; usage data; and aggregate statistical information.
- Employer details: where you interact with us in your capacity as an employee of a third party; and the name, address, telephone number and email address of your employer, to the extent relevant.
- Content and advertising data: records of your interactions with our online advertising and content, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such content or advertising (e.g., mouse hover, mouse clicks, any forms you complete in whole or in part) and any touchscreen interactions.
- Cookie data: we collect information *via* cookies and similar technologies. Please see our [Cookie Notice](#) for more details.

(E) Sensitive Personal Data

Summary – Sensitive Personal Data

Where we need to Process Sensitive Personal Data for a legitimate purpose, we do so in accordance with applicable law.

In some circumstances, it is necessary for us to Process Sensitive Personal Data (e.g., health data, or data relating to criminal records) for the purposes of providing insurance and/or related services. Where it becomes necessary to Process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

- Compliance with applicable law: We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);
- Detection and prevention of crime: We may Process your Sensitive Personal Data where the Processing is necessary for the detection or prevention of crime (e.g., the prevention of fraud);

- Establishment, exercise or defence of legal claims: We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise or defence of legal claims; or
- Consent: We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your express consent prior to Processing your Sensitive Personal Data.

If you provide Sensitive Personal Data to us, you must ensure that it is lawful for you to disclose such data to us, and you must ensure a valid legal basis applies to the Processing of those Sensitive Personal Data.

(F) Purposes of Processing and legal bases for Processing

Summary – Purposes of Processing and legal bases for Processing
 We Process Personal Data for the following purposes: providing our Sites, and services to you; compliance checks; operating our business; communicating with you; managing our IT systems; health and safety; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; compliance with applicable law; improving our Sites, and services; fraud prevention; establishment, exercise and defence of legal claims; and recruitment and job applications.

The purposes for which we Process the categories of Personal Data identified in Section (D) above, subject to applicable law, and the legal bases on which we perform such Processing, are as follows:

Purpose of Processing	Categories of Personal Data	Legal basis for Processing
<ul style="list-style-type: none"> • <u>Provision of Sites, and services</u>: providing our Sites or services; providing promotional items upon request; and communicating with you in relation to those Sites or services. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Demographic information • Consent records • Purchase details • Payment details • Data relating to our Sites • Employer details • Content and advertising data • Cookie data 	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of providing our Sites or services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • <u>Compliance checks</u>: fulfilling our regulatory compliance obligations; ‘Know Your Client’ checks; and confirming and verifying your identity; use of credit reference agencies; and screening against government and/or law enforcement agency sanctions lists and other legal restrictions. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Professional details • Consent records • Payment details • Employer details 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of fulfilling our regulatory and compliance obligations (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Purpose of Processing	Categories of Personal Data	Legal basis for Processing
<ul style="list-style-type: none"> • <u>Operating our business</u>: operating and managing our Sites and our services; providing content to you; displaying advertising and other information to you; communicating and interacting with you via our Sites or our services; and notifying you of changes to any of our Sites or our services. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Consent records • Payment details • Data relating to our Sites • Content and advertising data • Cookie data 	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of operating our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • <u>Planning</u>: organisational planning; succession planning; making changes to the nature and scope of our operations or our business; mergers, acquisitions, dissolutions demergers, liquidations, asset sales, divestitures, reorganisations and similar corporate structuring arrangements. 	<ul style="list-style-type: none"> • Personal details • Contact details • Professional details • Demographic information • Data relating to our Sites • Employer details • Content and advertising data 	<ul style="list-style-type: none"> • We have a legitimate interest in carrying out the Processing for the purpose of planning the future operation of our operations or our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Communications and marketing</u>: communicating with you via any means (including via email, telephone, text message, social media, post or in person) to provide news items and other information in which you may be interested, subject always to obtaining your prior opt-in consent to the extent required under applicable law; personalising our Sites, products and services for you; maintaining and updating your contact information where appropriate; obtaining your prior, opt-in consent where required; enabling and recording your choice to opt-out or unsubscribe, where applicable. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Survey and testing data • Demographic information • Consent records • Data relating to our Sites • Content and advertising data • Cookie data 	<ul style="list-style-type: none"> • The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or • We have a legitimate interest in carrying out the Processing for the purpose of contacting you, subject always to compliance with applicable law (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • <u>Management of IT systems</u>: management and operation of our communications, IT and security systems; and audits (including security audits) and monitoring of such systems. 	<ul style="list-style-type: none"> • Personal details • Contact details • Professional details • Survey and testing data • Demographic information • Consent records • Payment details • Data relating to our Sites • Employer details • Content and advertising data • Cookie data 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • We have a legitimate interest in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Purpose of Processing	Categories of Personal Data	Legal basis for Processing
<ul style="list-style-type: none"> • Health and safety: health and safety assessments and record keeping; providing a safe and secure environment at our premises; and compliance with related legal obligations. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Visitor logs 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • We have a legitimate interest in carrying out the Processing for the purpose of ensuring a safe environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • The Processing is necessary to protect the vital interests of any individual.
<ul style="list-style-type: none"> • Financial management: sales; finance; corporate audit; and supplier management. 	<ul style="list-style-type: none"> • Personal details • Contact details • Payment details 	<ul style="list-style-type: none"> • We have a legitimate interest in carrying out the Processing for the purpose of managing and operating the financial affairs of our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • Surveys: engaging with you for the purposes of obtaining your views on our Sites or our services. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Survey and testing data • Consent records 	<ul style="list-style-type: none"> • We have a legitimate interest in carrying out the Processing for the purpose of conducting surveys, satisfaction reports and market research (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • Security: physical security of our premises (including records of visits to our premises); CCTV recordings; and electronic security (including login records and access details). 	<ul style="list-style-type: none"> • Personal details • Contact details • Visitor logs 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • We have a legitimate interest in carrying out the Processing for the purpose of ensuring the physical and electronic security of our business and our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law. 	<p>Each category of Personal Data identified in Section (D) above, to the extent necessary in the context of the relevant legal obligation or regulatory requirements or guidance.</p>	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; or • We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • Legal compliance: compliance with our legal and regulatory obligations under applicable law. 	<p>Each category of Personal Data identified in Section (D) above, to the extent necessary in the context of the relevant legal obligation or regulatory requirements or guidance.</p>	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation, where applicable; or • We have a legitimate interest in carrying out the Processing for the purpose of compliance with regulatory requirements or guidance (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Purpose of Processing	Categories of Personal Data	Legal basis for Processing
<ul style="list-style-type: none"> • <u>Improving our Sites, and services</u>: identifying issues with our Sites or our services; planning improvements to our Sites or our services; and creating new Sites or services. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Survey and testing data • Demographic information • Consent records • Data relating to our Sites • Content and advertising data • 	<ul style="list-style-type: none"> • We have a legitimate interest in carrying out the Processing for the purpose of improving our Sites or our services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).
<ul style="list-style-type: none"> • <u>Fraud prevention</u>: Detecting, preventing and investigating fraud. 	Each category of Personal Data identified in Section (D) above, to the extent necessary in the context of the relevant fraud detection, prevention or investigation activities.	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation (especially in respect of applicable employment law); or • We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).
<ul style="list-style-type: none"> • <u>Establishment, exercise and defence of legal claims</u>: management of legal claims; establishment of facts and claims, including collection, review and production of documents, facts, evidence and witness statements; exercise and defence of legal rights and claims, including formal legal proceedings. 	Each category of Personal Data identified in Section (D) above, to the extent necessary in the context of the relevant legal obligation or regulatory requirements or guidance.	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation; • We have a legitimate interest in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • The Processing is necessary for the establishment, exercise or defence of legal claims.
<ul style="list-style-type: none"> • <u>Recruitment and job applications</u>: recruitment activities; advertising of positions; interview activities; analysis of suitability for the relevant position; records of hiring decisions; offer details; and acceptance details. 	<ul style="list-style-type: none"> • Personal details • Contact details • Correspondence • Professional details • Survey and testing data • Demographic information • Visitor logs • Consent records • Data relating to our Sites • Employer details • Content and advertising data 	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation (especially in respect of applicable employment law); or • We have a legitimate interest in carrying out the Processing for the purpose of recruitment activities and handling job applications (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or • We have obtained your prior consent to the Processing (e.g., where this is necessary for the purposes of criminal records checks, in accordance with applicable law).

(G) Disclosure of Personal Data to third parties

Summary – Disclosure of Personal Data to third parties
We disclose Personal Data to: legal and regulatory authorities; our external advisors; our Processors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business; and any third party providers of advertising, plugins or content used on our Sites.

We disclose Personal Data to other Clear entities, for legitimate business purposes and the operation of our Sites or services to you, in accordance with applicable law. In addition, we disclose Personal Data to:

- you and, where appropriate, your appointed representatives;
- product providers (insurers, managing agents or other intermediaries) where we obtain quotes, amend your policy or make a claim;
- parties responsible for administration of insurance policies or claims;

- credit providers, where you require us to apply to pay your premium in instalments;
- accountants, auditors, consultants, lawyers and other outside professional advisors to Clear, subject to binding contractual obligations of confidentiality;
- third party Processors (such as payment services providers; etc.), located anywhere in the world, subject to the requirements noted below in this Section (G);
- any relevant party, regulatory body, governmental authority, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal claims;
- any relevant party, regulatory body, governmental authority, law enforcement agency or court, for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- any relevant third party acquirer(s) or successor(s) in title, in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and
- any relevant third party provider, where our Sites use third party advertising, plugins or content. If you choose to interact with any such advertising, plugins or content, your Personal Data may be shared with the relevant third party provider. We recommend that you review that third party's privacy policy before interacting with its advertising, plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

(H) International transfer of Personal Data

Summary – International transfer of Personal Data

We transfer Personal Data to recipients in other countries. Where we transfer Personal Data from the UK or the EEA to a recipient outside the UK or the EEA (as applicable) that is not in an Adequate Jurisdiction, we do so on the basis of Standard Contractual Clauses or UK addendum to the Standard Contractual Clauses.

Because of the international nature of our business, we transfer Personal Data internationally, in connection with the purposes set out in this Notice. This may result in transfers of Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

If an exemption or derogation applies (e.g., where a transfer is necessary to establish, exercise or defend a legal claim) we may rely on that exemption or derogation, as appropriate. Where no exemption or derogation applies, and we transfer your Personal Data from the UK or the EEA to recipients located outside the UK or the EEA (as applicable) who are not in Adequate Jurisdictions, we do so on the basis of Standard Contractual Clauses or UK addendum to the Standard Contractual Clauses. You are entitled to request a copy of our Standard Contractual Clauses or UK addendum to the Standard Contractual Clauses using the contact details provided in Section (P) below.

(I) Data security

Summary – Data security

We implement appropriate technical and organisational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information *via* the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet

– any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

(J) Data accuracy

Summary – Data accuracy

We take every reasonable step to ensure that your Personal Data are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up-to-date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

(K) Data minimisation

Summary – Data minimisation

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice.

(L) Data retention

Summary – Data retention

We take every reasonable step to ensure that your Personal Data are only retained for as long as they are needed in connection with a lawful purpose.

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

(1) we will retain Personal Data in a form that permits identification only for as long as:

- (a) we maintain an ongoing relationship with you (e.g., where you are lawfully included in our mailing list and have not unsubscribed); or
- (b) your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid legal basis (e.g., where we have a legitimate interest in Processing those Personal Data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data),

plus:

(2) the duration of:

- (a) any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data are relevant); and
- (b) an additional two (2) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

and:

(3) in addition, if any relevant legal claims are brought, we continue to Process Personal Data for such additional periods as are necessary in connection with that claim.

During the periods noted in paragraphs (2)(a) and (2)(b) above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data.

(M) Your legal rights

Summary – Your legal rights

Subject to applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Controller; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. In some cases it will be necessary to provide evidence of your identity before we can give effect to these rights.

Subject to applicable law, you may have the following rights regarding the Processing of your Relevant Personal Data:

- the right not to provide your Personal Data to us (however, please note that we will be unable to provide you with the full benefit of our Sites or services, if you do not provide us with your Personal Data – e.g., we might not be able to process your requests without the necessary details);
- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
 - erasure of your Relevant Personal Data; or
 - restriction of Processing of your Relevant Personal Data;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (i.e., in relation to the UK, the Information Commissioner's Office (<https://ico.org.uk/>) or in relation to the EU, the Data Protection Authority for EU Member State in which you live, or in which you work, or in which the alleged infringement occurred (see the list here: https://edpb.europa.eu/about-edpb/about-edpb/members_en)).

Subject to applicable law, you may also have the following additional rights regarding the Processing of your Relevant Personal Data:

- **the right to object, on grounds relating to your particular situation, to the Processing of your Relevant Personal Data by us or on our behalf, where such processing is based on Articles 6(1)(e) (public interest) or 6(1)(f) (legitimate interests) of the GDPR / UK GDPR; and**
- **the right to object to the Processing of your Relevant Personal Data by us or on our behalf for direct marketing purposes.**

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section (P) below. Please note that:

- in some cases it will be necessary to provide evidence of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

(N) Terms of Use

Summary – Terms of Use

Our [Website Terms of Use](#) govern all use of our Sites, and our services.

All use of our Sites or services is subject to our [Website Terms of Use](#). We recommend that you review our Terms of Use regularly, in order to review any changes we might make from time to time.

(O) Direct marketing

Summary – Direct marketing

We Process Personal Data to contact you with information regarding Sites or services that may be of interest to you. You may unsubscribe for free at any time.

We Process Personal Data to contact you *via* our Newsletters, email, telephone, direct mail or other communication formats to provide you with information regarding Sites or services that may be of interest to you. We also Process Personal Data for the purposes of displaying content tailored to your use of our Sites or services. If we provide Sites or services to you, we may send or display information to you regarding our Sites or services, upcoming promotions and other information that may be of interest to you, including by using the contact details that you have provided to us, or any other appropriate means, subject always to obtaining your prior opt-in consent to the extent required under applicable law.

You may unsubscribe from our promotional email list at any time by simply clicking on the unsubscribe link included in every promotional electronic communication we send. Please note that it may take up to 2 weeks to process your unsubscribe request during which time you may continue to receive communications from us. After you unsubscribe, we will not send you further promotional emails, but in some circumstances we will continue to contact you to the extent necessary for the purposes of any Sites or services you have requested.

(P) Details of Controllers

Summary – Details of Controllers

There are several Clear entities that act as Controllers for the purposes of this Privacy Notice.

The Clear Group is made up of subsidiary companies involved in the arrangement of commercial and consumer general insurance policies. For the purposes of this Notice, the relevant Controllers are:

Controller entity	Contact details
Clear Insurance Management Limited	1 Great Tower Street London EC3R 5AA compliance@thecleargroup.com
Clear Group (Holdings) Limited	compliance@thecleargroup.com
Brokerbility Limited	compliance@thecleargroup.com
Brokertech Limited	compliance@thecleargroup.com

Brokerability Information Gateway Limited	compliance@thecleargroup.com
Centor Insurance & Risk Management Limited	compliance@thecleargroup.com
ProAktive Limited	compliance@thecleargroup.com
ProAktive Risk Management Limited	compliance@thecleargroup.com
Profile Risk Solutions Limited	compliance@thecleargroup.com
One Commercial Specialty Limited	compliance@thecleargroup.com
IFM Insurance Brokers Limited	compliance@thecleargroup.com
Bluestone Insurance Services Limited	compliance@thecleargroup.com
Peter Hoare & Company (Insurance Brokers) Limited	compliance@thecleargroup.com
Porticus Insurance Consultants Limited	compliance@thecleargroup.com

Alternatively, you may contact us using our online [Contact Us](#) form.

(Q) Definitions

- **“Adequate Jurisdiction”** means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.
- **“Cookie”** means a small file that is placed on your device when you visit a website (including our Sites). In this Notice, a reference to a “Cookie” includes analogous technologies such as web beacons and clear GIFs.
- **“Controller”** means the entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **“Data Protection Authority”** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **“EEA”** means the European Economic Area.
- **“GDPR”** means the General Data Protection Regulation (EU) 2016/679.
- **“Personal Data”** means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- **“Process”, “Processing” or “Processed”** means anything that is done with any 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.
- **“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

- **“Relevant Personal Data”** means Personal Data in respect of which we are the Controller.
- **“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, biometric data, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that are deemed to be sensitive under applicable law.
- **“Standard Contractual Clauses”** means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.
- **“Site”** means any website operated, or maintained, by us or on our behalf.
- **“UK GDPR”** means the GDPR as it forms part of the laws applicable in the UK by virtue of section 3 of the European Union (Withdrawal) Act 2018 and the Data Protection Act 2018, and as applied and modified by Schedule 2 of the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419) or as modified from time to time.