

PRIVACY NOTICE

Introduction

Welcome to the privacy notice of the Insurance Claims Accommodation Bureau ("ICAB").

ICAB respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. [Alternatively you can download a pdf version of this [Privacy Notice here](#).] Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

This privacy notice aims to give you information on how ICAB collects and processes your personal data, including any data you may provide through this website, when you sign up to our newsletter, and/ or purchase a product or service.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller and Processor

Insurance Claims Accommodation Bureau is made up of a number of companies, Insurance Claims Accommodation Bureau Limited, Everlasting (UK) Limited and ICAB Pods Limited. This privacy notice is issued on behalf of all of these companies, so when we mention "ICAB", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the ICAB group that is responsible for processing your data. In relation to this website Insurance Claims Accommodation Bureau Limited is the controller and processor and responsible for this website.

Processor

Please note that where we are acting as a data processor for one of our clients (typically an insurer or housing association or local authority on whose behalf we arrange accommodation for their policyholders or tenants, our processing of personal data will be governed by the privacy policy of that client as the data controller and our agreement with them in relation to any processing we undertake for them. You will be able to obtain details of their privacy policy through them in each case.

Privacy Manager

We have appointed a Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise **your legal rights**, please contact the Privacy Manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Insurance Claims Accommodation Bureau Limited

Title: Privacy Manager

Email address: privacy@icab.uk.com

Postal address: Insurance Claims Accommodation Bureau Limited, Heronslea House, High Street, Bushey, Hertfordshire WD23 3HH.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25th May 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Claim Data** includes your policy number, claim number, and the name, contact details and references of your insurer, claims handler or other relevant party.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences and feedback.
- **Usage Data** includes information about how you use our website, products and services.
- **Telephone Recordings** includes records of your calls to the office for the purposes of training and developing our staff, improving our service, investigating disputes, and recording that you consented to us forwarding your personal data to third parties.
- **Special Categories of Personal Data** includes the number of family members (including children) living at your address, the ages and genders of the family members (including children) living at your address, data relating to your mobility or current health or that of your family members (including children), and your voice recordings when you call our offices.

We do not collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with appropriate alternative accommodation and/or to perform other contractual obligations or services relating to your home emergency claim). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Claim, Telephone Recordings Data and Special Categories of Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - speak to us on the telephone;
 - create an account on our website;
 - request marketing to be sent to you;
 - subscribe to our service;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Recorded phone calls:** Please note that many of our phone lines are recorded as a matter of course. When you phone us that will be announced to you as part of the greeting. When we phone you we will mention this to you as well. You may of course choose not to continue the call and to communicate with us by email instead. We use the phone recordings both as a record of that part of our business which is conducted by phone and where necessary to verify what has been said during a call, usually in the context of resolving a dispute. We also use the call recordings to support our quality control and training of our staff in their provision of customer service.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties:
 - Analytical Data from service providers such as Google who are or may be based both in the European Union and outside the European Union
 - Identity and Contact Data from our clients providing us with your Identity and Contact Data so that we can make our products or services available to you

on their behalf, [and or from publicly available sources such as Companies House and the Electoral Register based inside the EU].

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into as a third-party provider in relation to your Home Emergency Claim, Decant or similar circumstance.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [[here](#)] to find out more about the types of lawful basis that we will rely on to process your personal data.

Where we require your consent

Generally, we do not rely on Consent as a legal basis for processing your personal data other than in relation to collecting, using, storing or transferring personal data that belongs to a "special category of personal data" (see Glossary). You have the right to withdraw your consent at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you

<p>To process and deliver our products and/ or services to you including:</p> <p>a) manage payments, fees and charges</p> <p>b) collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Profile</p> <p>(f) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (for invoicing and accounting purposes, and to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Claim</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business (including auditing for financial and quality purposes, internal quality control and strategy analysis) and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Claim</p> <p>(d) Technical</p> <p>(e) Financial</p> <p>(f) Usage</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content to you</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our</p>

	(c) Claim (d) Profile (e) Usage (f) Technical	business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant and to develop our business)
To provide your insurance provider(s) with data such as supplier management information returns, costs and claim spread analysis and other data relevant to your claim	(a) Identity (b) Contact (c) Claim (d) Profile (e) Financial (f) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to develop our products/services and grow our business)
Recording phone calls	a) Identity (b) Contact (c) Claim (d) Profile (e) Financial (f) Transaction	a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation (c) Consent

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookies Policy](#)

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible

with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Specific third parties such as estate agents, accommodation providers such as hotels or serviced apartments providers, furniture providers, and storage and removal providers.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In most cases, your personal data will not be held for more than 8 years, starting on the date your claim is closed. This is in line with both our contractual obligations and relevant statutory and legal requirements.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact our Privacy Manager privacy@icab.uk.com Where ICAB is the data processor and is not the controller, we will forward any request on to the data controller.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Consent means instances where you have given explicit consent to the processing of your personal data belonging to a "special category of personal data" (Article 9, GDPR) for one or more specified purposes. Your consent will then be recorded in our systems and may also be recorded on the file of our client where we are the data processor and not the data controller, and or on the file of any relevant third party to whom the information is provided in accordance with the consent.

Exercise or Defence of Legal Claims means processing your data where it is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the ICAB Group acting as joint controllers and/ or processors and who are based in the United Kingdom and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the United Kingdom who provide IT, database management and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Accommodation providers such as hotels or serviced apartment providers, estate agents, furniture providers and providers of storage and removal services.

YOUR LEGAL RIGHTS

You have the right to:

- 10.1 **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 10.2 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 10.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 10.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- 10.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 10.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 10.7 **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.