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# carpenters group

Fair Processing Notice

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## Fair Processing Notice

Carpenters Limited (and group companies) must comply with the General Data Protection Regulation. Carpenters Limited is accredited with the Quality Standard in Information Security ISO27001. As Data Controllers and/or Processors, we must provide you with details of personal information we may collect about you, how we may use it and what we do to keep it secure. We also explain your rights in respect of your personal information and how to contact us should this become necessary.

### Lawful Processing of Data - Personal Data

You have provided consent for your data to be passed to Carpenters, directly or via your insurer, for the purpose of instructing the firm to act for you with regards to a legal claim. As Data Controllers, under the retainer that you have entered into with us, we will process and store your personal data on one or more of the following Data Protection conditions:

- with your consent;
- processing is necessary for the performance of a contract with you or to take steps to enter into a contract with you;
- processing is necessary for compliance with a legal obligation;
- processing is necessary for the purposes of legitimate interests pursued by the data controller or a third party, except where such interests are overridden by your interests, rights or freedoms.

Where consent has been provided, you have the right to withdraw that consent at any time by contacting our Data Protection Officer whose details are provided at the end of this Notice.

### Lawful Processing - Special Category Data

Depending on the nature of your claim with us, we may need to process and/or store your medical and/or employment data, which, for the purposes of data protection, is classed as a "special category" of data. If so, the processing will be on one or more of the following conditions:

- with your explicit consent;
- processing is necessary for the establishment, exercise or in defence of legal claims or courts are acting in their judicial capacity;
- processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.

We will obtain your signed consent to allow your medical records and data to be processed in line with our instructions. Data processing may be via electronic means and/or in paper format and will be stored for the purpose it has been obtained and for as long as it is needed for that purpose and to fulfill our regulatory and/or legal obligations.

### Data Sharing

We may have to share your data with third party organisations and individual(s) involved in the claims process. All of these third parties have a legal duty to comply with data protection legislation and will process your data on our behalf. These may include the following types of third parties:

- Government backed motor data institutions such as the Motor Insurance Bureau and/or the Claims Portal;
- Fraud prevention bodies such as the Insurance Fraud Bureau or the Motor Insurer Anti-Theft Agency;
- Solicitors Regulation Authority, Financial Conduct Authority, Legal Ombudsman and quality auditors (Lexcel/ISO27001);
- Registered medical agencies and/or professional medical experts, hire and/or repair and/or engineer companies;

- Your insurer and the third party's insurer;

In these circumstances, we will use all best endeavours to ensure that your information is properly protected and that it is only used in accordance with this privacy policy.

### **Electronic Signatures**

To support our electronic communication strategy we will use e-signatures where appropriate with software provided by Legal E-sign. These signatures are secure, audited and legally admissible.

For further information please view [www.legalesign.com](http://www.legalesign.com)

Any questions in relation to this process should be directed to [mro@carpentersgroup.co.uk](mailto:mro@carpentersgroup.co.uk)

### **Retention of information**

We keep personal information for as long as necessary to ensure we can fulfil to meet our legal and operational requirements in accordance with current Data Protection legislation and applicable regulation.

### **Your Individual Data Rights**

You can ask us to update, remove, transfer or stop processing your personal data by contacting your claim handler, using the email address below, via our App/Web or by telephone.

You also have the right to request a copy of the personal data that we hold about you – this is called a subject access request. We must comply within one month or explain why that may not be possible.

We have processes in place to identify your personal data to enable us to make **reasonable efforts** in searching our systems to identify your personal data although we may charge for any complex requests. There may be occasion where a request is deemed to be unreasonable and/or excessive and we will explain why this is the case. Please note that a subject access request entitles you to a copy of your personal data, not all documents in which it is contained.

We do not record all calls across the business and therefore we may not have calls relating to your file. Our storage capacity is limited and therefore calls are overwritten. There is no specific time frame as it will depend on volumes at any given time. The only calls that are always recorded are those taken as part of the claim notification process and they are stored for two years. Calls relating to legal files are not attached to individual files and do not sit in the file history within our case management system.

You have the right to lodge a complaint with the Supervisory Authority which in the UK is the Information Commissioners' Office with whom we are registered under reference ZA147287. [www.ico.org](http://www.ico.org) or via telephone 0303 123 1113. Our Data Protection Officer is Maria Rodman ([mro@carpentersgroup.co.uk](mailto:mro@carpentersgroup.co.uk)). We will take all reasonable steps to confirm your identity before complying with any requests in relation to your data.