



Privacy Notice

At Source Commercial we're committed to protecting and respecting your privacy, that's why we have put together this Privacy Policy to reassure you about what data we hold, how we use it and your rights concerning that data.

Who are we?

Source Commercial is a trading style of Red Apple Risk Solutions Limited. This privacy policy explains how we use any personal information we collect from you throughout the duration of your contract with us.

You can reach us at any time on 02921 677140, by email at commercial@sourcecommercial.co.uk or by post at Suite 7, 33-35 West Bute Street, Cardiff, CF10 5LH. We are registered in England and Wales no. 08365670.

We process your personal information in order to carry out the legitimate interests of providing insurance quotations, providing insurance policies and enabling us to provide advice on products and services that you may require.

You have a right to complain about the way your data is treated by us to the Information Commissioners Office (ICO) by visiting <https://ico.org.uk/concerns/> or calling 0303 123 1113.

What information do we collect on you?

We obtain information about you when you complete electronic or paper application forms, when you call us to provide information pertinent to an insurance quotation, or if you have instructed an intermediary to do so on your behalf.

The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when. If you purchase a product from us and pay by credit or debit card, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below. This will include sensitive information about convictions history and your financial information.

How will we use this information about you?

We use this data for the sole purpose of providing an insurance quotation and if required the purchase and ongoing administration of that insurance policy.

We have established that our lawful basis for processing your data is that it is in our legitimate interest to do so. By doing so it enables us to provide you with Insurance quotations and policies, Risk Management Support and advice, as well as let you know about products and services that you could require.

As a result you have the right to object, and if you wish to do so you must contact us to inform us of this and why you wish to object.

We will continue to process your data throughout the life of your Insurance Policy, you can stop this by informing us to cancel your policy or stop searching for insurance quotations. However we will still hold data



on you for our legitimate purposes, for example to comply with legal or regulatory requirements and to administer any claims or complaints.

How is your information used?

We may use your information to:

- Process policy proposals that you have submitted to us
- Process your data with Insurance companies to obtain Insurance quotation and policies
- Carry out our obligations arising from any contracts entered into by you and us
- Offering you a review of the Insurance products available to you at each and every renewal
- Notify you of changes to our services
- Seek your views or comments on the services we provide
- Offer you access to our free business resources portal

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our obligations to insurers and regulators. We will hold your personal information on our systems only for as long as is necessary for the relevant activity, or as long as is required pertaining to any relevant contract you hold with us.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf:

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process membership of our employee perks & reward programme). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure, and not to use it for their own direct marketing purposes. Please rest assured that we will not release your information to third parties beyond Red Apple Risk Solutions Limited for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order, or for the purposes of prevention of fraud or other crime.



Who we can share your information with

We will share your data with legal, regulatory and Insurance companies for the purpose of legally managing your contract of insurance with us.

In processing your data, we may send your details to, and also use information from credit reference agencies and fraud prevention agencies.

How you can access and update your information

The accuracy of your information is important to us, should you change your email address, address or phone number, or any of the other information we hold is inaccurate or out of date, please email us at: commercial@sourcecommercial.co.uk, or write to us at: Red Apple Risk Solutions Ltd T/A Source Commercial, Suite 7, 33-35 West Bute Street, Cardiff, CF10 5LH. Alternatively, you can telephone 02921 677140 or let your Line Manager know.

You have the right to ask for a copy of the information Red Apple Risk Solutions Ltd holds about you. Where we have reason to believe the request is excessive (for example, where you make multiple or repeat requests), we may charge a fee to cover our costs in providing this information. We will provide information requested within one month of the request being received.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with a minimum of 256 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

How long will we keep your information?

We will keep your information for as long as you have a relationship with us. After it ends we'll keep it where we need it for our legitimate purposes, for example to comply with the law or regulatory requirements and complaints or queries.

Your rights

You have a number of rights relating to your information, for example to see what we hold, to update incorrect or incomplete details or to object or restrict to our processing of it.



Review of this Policy

We keep this Policy under regular review. This Policy was last updated in May 2018.