

PRIVACY NOTICE

Important Notice

This is the Privacy Notice of Early Years Scotland.

This Privacy Notice sets out how we collect and process your personal data. This Privacy Notice also provides certain information that is legally required and lists your rights in relation to your personal data.

This Privacy Notice relates to personal information that identifies you as a natural person (whether you are an actual or potential customer, an individual who browses our website or an individual outside our organisation with whom we interact). We refer to this information throughout this Privacy Notice as personal data or personal information and further details of what this includes are set out in this Privacy Notice below.

The privacy and security of your personal information is very important to us so we want to assure you that your information will be properly managed and protected by us at all times. Please read this Privacy Notice carefully as it explains how we may collect and use your personal data.

This Privacy Notice may vary from time to time so please check it regularly. This Privacy Notice was last updated on 17 March 2021

How to Contact Us

Controller and contact details

For the purposes of relevant data protection legislation, we are a **controller** of your personal data. As a controller we use (or **process**) the personal data we hold about you in accordance with this Privacy Notice.

For any questions or concerns relating to this Privacy Policy or our data protection practices, or to make a subject access or any other request regarding the information we hold, please contact us at the above address or telephone us on 0141 221 4148.

Data Protection Representative

Our Data Protection Representative is Michele Doull whom you can contact at 23 Granville Street, Glasgow, G3 7EE.

What Information We Hold About You, Where We Obtain This and How We Use Your Personal Information

We only collect, use and store your information where we have lawful grounds and legitimate business reasons to do so.

We collect, use and store your personal information in order to fulfil requests for your membership, professional learning and any associated insurance products you select. It may also be used to verify your identity, to administer payments and to enable us to carry out anti-money laundering and other financial crime checks where required. If you pay by instalments for your insurance, your information may also be used to arrange credit.

The use of your data is essential for us to check your identity, to enable you to obtain Early Years Scotland membership and if selected, enter into an insurance contract and for the insurance to operate (in the event of a claim, for example). We may also use it to keep our records up to date, to notify you about changes to our service and to help us in developing new products and services.

If you do not provide the information required, we are unlikely to be able to arrange your membership and insurance or provide professional learning and may not be able to provide certain services to you.

We may monitor calls, emails, text messages and other communications with you. When you contact us we may keep a record of that correspondence and any information provided to us during that or any subsequent communication.

The personal data that we collect about you may include the following information:

- Personal data you provide to us in person, via our website or by telephone,



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- Personal data you provide when you enquire about Early Years Scotland membership, Early Years Scotland Professional Learning or when you purchase a policy, through us, including information about what and/or who you want to insure, such a setting details and business activities, details,
- General information about you, such as your name, address, contact details, date of birth, gender, marital status and employment details,
- Personal data you provide if you subscribe to any of our mailing or newsletter services,
- Your claims and credit history,
- Financial details, such as your bank account and card details,
- Criminal convictions,
- Information about your use of our website, such as your IP address, which is a unique number identifying your computer, including personal data gathered using cookies.

We collect your personal data from you as a controller when we provide professional learning, assist with your membership and if relevant obtain quotations for insurance for you, when we set up your policy for you and when we make changes to your policy for you. This may also involve the collection of data from or about others who are associated with you and your insurance policy such as other persons insured on your policies or your employees or representatives. By giving us information about someone else for the purpose of arranging insurance for them under your policy such as, employee you confirm that you have their permission to do so and that you have shared this Privacy Notice with them.

By asking us to arrange an Early Years Scotland membership and where applicable a contract of insurance for you where this involves passing information to us relating to children (in this instance, children in accordance with the UN Convention of the Rights of the Child are individuals under the age of 18), you confirm to us that in doing so you are the responsible guardian of the child.

We also collect information from publicly available sources and third-party databases made available to the insurance industry for the purposes of reducing fraud and financial crime as well as any other third-party databases where your personal data may be held, provided such third parties have lawful bases on which to share such personal data with us.

How We Use Your Personal Data and the Lawful Basis for Doing So

Insurance products for the Early Years Scotland members is arranged via Alan R. Mackay & Company Limited trading as MacKay Corporate Insurance Brokers and insurance products are provide by Royal Sun Alliance Limited.

Early Years Scotland are an Appointed Representative of Alan R. Mackay & Company Limited trading as MacKay Corporate Insurance Brokers and whose registered office is at 38 Miller Road, Ayr, KA7 2AY. Alan R. Mackay & Company Limited trading as MacKay Corporate Insurance Brokers is authorised and regulated by the Financial Conduct Authority (FCA) under firm reference number 305677. You may check this on the Financial Services Register by visiting the FCA's website, www.fca.gov.uk/register/ or by contacting the FCA on 0800 111 6768

Alan R. Mackay & Company Limited trading as MacKay Corporate Insurance Brokers and Royal Sun Alliance Limited have their own Privacy Notices which can be found on their respective websites.

Where we are relying on a basis other than consent

We may rely on one or more of the following legal bases when processing your personal data for the following purposes:

Purposes for which we process your personal data	The basis on which we can do this (this is what the law allows)
In order to perform our contractual obligations to you. This would include our fulfilling your requests for membership services insurance services and professional learning services (including obtaining insurance for you, fulfilling requests for mid-term adjustments and obtaining renewals)	The processing is necessary in connection with any contract that you may enter into with us
To administer your membership account, including financial transactions for bringing about an insurance contract	The processing is necessary in connection with any contract that you may enter into with us

To assist in the prevention and reduction of fraud and other financial crime	The processing is necessary for us to comply with the law and our legal requirements
In the interests of security and to improve our service, telephone calls you make to us may be monitored and/or recorded	The processing is necessary to pursue our legitimate interest in the management and operation of our business
To let you know about similar products and services that may be of interest to you	The processing is necessary to pursue our legitimate interest in operating our business

Who We Pass Your Personal Data To

We may need to pass your personal data to other companies which may include:

- Other companies or brands within our organisation.
- The insurers, intermediaries and third-party service providers that we use for the purpose of arranging and administering your insurance policy. This may also include risk management assessors, uninsured loss recovery agencies, premium finance providers and other third parties involved (directly or indirectly) in the administration of your insurance and its associated benefits,
- Firms that provide administration and processing services to us or on our behalf under contract in order to complete activities such as claims handling, IT systems and administrative services and other activities set out in this Privacy Notice, as well as support activities such as finance and auditing services,
- Organisations that have a specific role laid out in law, such as statutory bodies, regulatory authorities and other authorised bodies,
- Other organisations where we have a duty to or are permitted to disclose your personal information by law; for example, if we received a valid request from the police or other third-party organisation in the interest of preventing and detecting crime,
- Fraud prevention agencies and operators of registers available to the insurance industry to check information and prevent fraud,
- Credit reference agencies to check your credit history. This check will be recorded on your credit reference file without affecting your ability to apply for credit or other financial products,
- Third parties we use to recover money you may owe us or to whom we may sell your debt,
- Another company, if our business or part of it is bought or taken over by that company to make sure your insurance policy can continue to be serviced or as part of preliminary discussions with that company about a possible sale or takeover.

The information you share with us may be transferred by us or any of the types of firms or organisations we have noted above, to other countries in order for processing to take place, including locations outside of the UK and the European Union. We will only do so if there are adequate levels of protection in place as required by applicable data protection laws.

Accessing Our Website and Cookies

When you visit our website we may collect information from you, such as your email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit. We use third parties to collate IP addresses to help us understand our internet traffic data and data regarding your browser type and computer. We may also use web usage information to create statistical data regarding the use of our website. We may then use or disclose that statistical data to others for marketing and strategic development purposes, but no individuals will be identified in such statistical data.

We may use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website, but not on your computer. Pixel tags usually work together with cookies to help us to give you a more tailored service. We also use cookies and pixel tags in our email communication to personalise the email and track whether the email has been opened and whether the recipient has used any website links contained in the email communication. This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found at <http://allaboutcookies.org>.

Internet browsers normally accept cookies by default, although it is possible to set a browser to reject cookies. We will ask your permission before using any cookie that is not essential to the email or the use of the website.



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However, refusing to accept cookies may restrict your use of our website and/or delay or affect the way in which our website operates. You can find more information on cookies when you visit our website.

The open nature of the internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. While this is outside of our control, we do take the protection of your information very seriously and aim to apply appropriate levels of security at all times.



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Your Rights

We will only store your data for as long as is necessary to comply with the requirements of your membership, engagement with professional learning or as part of your insurance contract(s) and any legal obligations or lawful processing conditions that may exist as a result. You have a number of rights concerning the personal information we use, which you may ask us to observe. In some cases, even when you make a request concerning your personal information, we may not be required or be able to carry out your request, as this may result in us not being able to fulfil our legal and regulatory obligations under the lawful processing conditions under which we hold your data, or because there is a minimum statutory period of time for which we have to keep your information. If this is the case, we will let you know our reasons.

You can ask us to:

- Provide a copy of your personal information,
- Correct or delete unnecessary or inaccurate personal information,
- Restrict or object to the use of your personal information at any time,
- Object to any automated decision, including profiling which may have been used by insurers when underwriting your quotation. Where an automated decision has been made we will advise you of this and of your rights,
- The right to be informed about our data processing activities, including through Privacy Notices such as this,
- Provide your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller. This right only applies where our processing of your personal data is automated and the processing took place initially with your consent or for the performance of a contract with you,
- Where we rely on your consent to use your personal information, you can withdraw that consent at any time. Where your consent is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you do not want us to contact you again.

If you have any questions or concerns about this Privacy Notice or your data protection rights please contact us using our details set out at the beginning of this Privacy Notice. If you are dissatisfied with how we deal with your complaint, you may contact the Information Commissioner's Office (ICO) at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephoning 0303 123 1113, or via their website www.ico.org.uk.

How We Contact You About Other Products and Services - Marketing

We may from time to time process your personal data to let you know about similar products and services that may be of interest to you. This is because we value your custom and we pride ourselves in sharing relevant information and relevant opportunities. Our lawful basis for processing your personal data in this way is to pursue the legitimate interests of our business, unless we have otherwise obtained your consent to do so. We may contact you by post, telephone or e-mail. You will be given the option to stop receiving any communications from us in this regard at any time however please note that this will not affect us contacting you about the servicing of products that you have specifically requested from us.

Withdrawal of Consent

Where you have provided your specific consent to the use of personal data, you may withdraw that consent by contacting us at 23 Granville Street, Glasgow, G3 7EE. or by telephoning 0141 221 4148