

PRIVACY POLICY

As a membership-based company dedicated to facilitating regulatory compliance and reducing the cost of that compliance for the UK insurance industry, REG (UK) Ltd “REG” is committed to maintaining your privacy. REG respects and values the privacy of everyone who visits this website, www.reg.uk.com (“Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of the Site. If you do not accept and agree with this Privacy Policy, you must stop using the Site immediately.

Our website is owned and operated by **REG (UK) Limited**, incorporated and registered in England and Wales with company number 8279867 whose registered address is 7th Floor Minster House, 42 Mincing Lane, London, EC3R 7AE and whose main trading address is at Ground Floor (The Studio), 52-54 Gracechurch Street, London, EC3V 0EH. Our VAT number is 164 1427 24 (“Us”, “We”, “Our”).

This privacy policy describes the practices we maintain regarding any personal or corporate information that we receive about you. Please take a moment to review our privacy policy and do not hesitate to contact us with any questions or concerns you may have support@reg.uk.com.

From time to time REG may need to make enhancements to our privacy practices. This may happen as the result of government regulation, new technologies, or other developments in the area of privacy protection. Any updates to our privacy policy will be clearly posted on the Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the Site following any update.

Please check back periodically to learn more about how REG is adhering to best practices in safeguarding your privacy.

This privacy policy was last updated in May 2018.

Your rights

As a data subject, you have the following rights under EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”), which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you;
- The right to rectification if any personal data We hold about you is inaccurate or incomplete;
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, but if you would like Us to delete it sooner, please contact Us);
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

For the purposes of this Privacy Policy, “**personal data**” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via the Site.

If you have any cause for complaint about Our use of your personal data, please contact Us using the following details support@reg.uk.com and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information

Commissioner's Office. For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

What Data do we collect?

Depending upon your use of the Site, We may collect some or all of the following personal and non-personal data (please also see below on Our use of Cookies and similar technologies):

- name;
- date of birth;
- gender;
- business/company name;
- job title;
- profession;
- contact information such as email addresses and telephone numbers;
- IP address;
- web browser type and version;
- a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

How we use your information

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- If you are a REG Member we will use your personal information to administer your membership and provide access to the Site. Active REG Members are listed on REG's website in the Members area, which any REG Member can search by category. Detailed personal information about a Member or their Authorised Users is available only to that Member and to other Members with whom the Member agrees to share the information.
- Personalising and tailoring your experience on the Site;
- Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
- Personalising and tailoring Our services for you;
- Replying to emails from you;
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking on the link at the bottom of Our emails.
- Market research;
- Analysing your use of the Site and gathering feedback to enable Us to continually improve the Site and your user experience.

With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text or post with information, news and offers on Our products and/or services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- If you are a REG Member or an Authorised User of a REG Member, data will be retained at all times whilst you remain a REG Member and for a period of 6 years afterwards, to deal with any ongoing claims or complaints;
- If you are not a REG Member or an Authorised User of a REG Member, you will be contacted at least once in every 12-month period to obtain your consent to the continued retention of your data. If we do not receive your consent within 30 days, we will attempt to contact you again within a further 30 days. Unless your consent is received within this period, your data will be deleted.

How and Where Do We Store Your Data?

We only keep your personal data for as long as We need to in order to use it as described above in “How we use your information”, and/or for as long as We have your permission to keep it.

Some or all of your data may be stored outside of the European Economic Area (“**the EEA**”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using the Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through the Site. Steps We take to secure and protect your data:

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. Further details are available on request.

Do We Share Your Data?

We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

We may sometimes use third party data processors that are located outside of the EEA. Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us. In the event that any of your data is to be transferred in such a manner, you will **not** be contacted in advance and informed of the changes.

How Can You Control Your Data?

In addition to your rights under the GDPR (see above), when you submit personal data via the Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your REG Account).

Your Right to Withhold Information

You may access certain areas of the Site without providing any data at all. However, to use all features and functions available on the Site you may be required to submit or allow for the collection of certain data.

How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge.

Please contact Us for more details support@reg.uk.com.

Our Use of Cookies

“Cookies” are small text files placed on your computer or device by a website when you visit certain parts of it and/or when you use certain features of a website.

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of the Site and to provide and improve Our services. Details of the Cookies used by the Site are set out below. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on the Site are used in accordance with the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (“Cookie Law”).

Before Cookies are placed on your computer or device, you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of the Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are identified in the table below as being ‘strictly necessary’. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings, but please be aware that the Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
RequestVerificationToken	Security protection against cross-site request forgery	Yes
ARRAffinity	Enables REG to persist current session data within Microsoft Azure Cloud Provider in the case of server failure.	Yes
.ASPXAUTH	Authenticates the user logging on to the platform.	Yes

The Site also uses analytics services provided by *Google Analytics & Hubspot and Lucky Orange*. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how the Site is used. This, in turn, enables Us to improve the Site and the products and services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve the Site, making it a better and more useful experience for you.

The analytics services used by the Site use the following Cookies to gather the required information:

Name of Cookie	First / Third Party	Provider	Purpose
__hstc	Third	Hubspot	HubSpot Analytics - The main cookie for tracking visitors. It contains the domain, utk (see below), initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session). (Expires: 2 years)
__hssrc	Third	Hubspot	HubSpot : This cookie keeps track of sessions. This is used to determine if we should increment the session number and timestamps in the __hstc cookie. It contains the domain, viewCount (increments each pageView in a session), and session start timestamp. (Expires: 30 min)
__hssc	Third	Hubspot	HubSpot : This cookie keeps track of sessions. This is used to determine if we should increment the session number and timestamps in the __hstc cookie. It contains the domain, viewCount (increments each pageView in a session), and session start timestamp. (Expires: 30 min)
hsPagesViewedThisSession	Third	Hubspot	HubSpot Analytics
hubspotutk	Third	Hubspot	HubSpot Analytics : This cookie is used for to keep track of a visitor's identity. This cookie is passed to HubSpot on form submission and used when de-duplicating contacts. (Expires: 10 years)
hubspot.hub.id	Third	Hubspot	HubSpot Authentication
hubspotauth	Third	Hubspot	HubSpot Authentication
hubspotauth.cms	Third	Hubspot	HubSpot Authentication

hubspotautremember	Third	Hubspot	HubSpot Authentication
_hs_opt_out	Third	Hubspot	Hubspot: Opt out of HubSpot tracking - This cookie is used by the opt-in privacy policy to remember not to ask the visitor to accept cookies again. This cookie is set when you give visitors the choice to opt out of cookies. (Expires: 2 years)
hubspotutkto	Third	Hubspot	Hubspot: Time Zone Offset
__hluid	Third	Hubspot	Hubspot: In-app usage tracking
mp_id_mixpanel	Third	Hubspot	Hubspot: In-app usage tracking
messagesUt	Third	Hubspot	Hubspot: Track visitors using messages
__hs_do_not_track	Third	Hubspot	Hubspot: This cookie can be set to prevent the tracking code from sending any information to HubSpot. Setting this cookie is different from opting out of cookies, which still allows anonymized information to be sent to HubSpot. (Expires: 2 years)
__hs_testcookie	Third	Hubspot	This cookie is used to test whether the visitor has support for cookies enabled. (Expires: Session cookie)
hs_ab_test	Third	Hubspot	Hubspot: if A/B testing is in operation, This cookie is used to consistently serve visitors the same version of an A/B test page that they've seen before. (Expires: Session cookie)
_gauges_unique_hour	Third	Hubspot	Hubspot: Gauges Analytics
_gauges_unique_day	Third	Hubspot	Hubspot: Gauges Analytics
_gauges_unique_month	Third	Hubspot	Hubspot: Gauges Analytics
_gauges_unique_year	Third	Hubspot	Hubspot: Gauges Analytics
_gauges_unique	Third	Hubspot	Hubspot: Gauges Analytics
apex__product	Third	Hubspot	Hubspot: Salesforce Analytics
_ga	Third	Google Analytics	Various general standard Google Analytics cookies to determine general website usage trends, to distinguish the number of new users from returning, exit points, country from which they are visiting. See overview

			https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
_lo_np_<Poll>	Third	Lucky orange	Set if a user should no longer received polls.
_global_lucky_opt_out	Third	Lucky orange	If set, will not run Lucky Orange. Set via our opt out links.
_lo_u	Third	Lucky orange	Tell if the user is a unique visitor to the site.
_lo_rid	Third	Lucky orange	The user's recording ID. This is auto extended as the visitor visits pages.
_lo_v	Third	Lucky orange	Total number of visits from this user
__lotr	Third	Lucky orange	Original Referrer the visitor came to the site from
_lo_cid	Third	Lucky orange	The chat ID of the current chat, if any

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access the Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

Pixel Tags

Pixel tags (also called clear gifs or web bugs) are used to track who is reading a web page or e-mail, when, and from what computer. They provide us with information about your interaction with our email messages (if you receive messages in html format) and to record some of the pages you consequently visit on the Site. We use this information so we can provide you with information tailored to your needs and interests, better plan our future services and upgrading visitor information used in reporting statistics. Pixel tag technology is used to analyse the reading habits of our membership in order to review and improve services to members and on occasion may use this for marketing purposes.

Other Websites

The Site may contain links to other websites. This privacy policy only applies to the Site so when you link to other websites you should read their own privacy policies.