



Privacy Policy

For the purpose of the Data Protection Act 1998 (the “Act”), the data controller is Nolan Ross Limited (trading as Nolan Ross, Nolan Ross Life and Nolan Ross Health) of Viscount House, River Lane, Saltney, Chester, Cheshire, CH4 8RH .

Nolan Ross Limited resell health and life insurers products on behalf of providers that offer their members a range of incentives and benefits for being healthy. This privacy policy applies to our non-investment private medical insurance plans, life insurance and protection plans, our range of incentives and benefits, our website, www.nolanross.co.uk (“our site”) and our mobile applications for iPhone OS and Android OS (collectively referred to in this privacy policy as the “Services”).

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using the Services you are accepting and consenting to the practices described in this privacy policy.

What type of data will be collected?

We may collect and process the following data about you:

(i) Information you give us

You may give us information about you when you use the Services, by filling in forms on our site or by corresponding with us by phone, email, post or otherwise. This includes information you provide when you register to use the the Vitality Member Zone, enter into a competition, promotion or survey and when you report a problem with our site. We may also need to collect sensitive personal data which could include details around your physical and mental health. You can choose whether to supply or withhold any sensitive personal data. However, withholding this information may restrict the Services we are able to offer you.

(ii) Information we receive from other sources

We may receive information about you from third parties who assist in the provision of the Services (including but not limited to, service providers and prospective new partners, sub-contractors in technical payment and delivery services, advertising networks, analytics providers, search information providers, and credit reference agencies). We will always ensure that any data we receive has been collected lawfully and fairly in accordance with your rights under the Act.

How we use your personal data

We will only collect personal data which is necessary to provide you with the Services or an associated or required service. We may process your personal data and sensitive personal data for the following reasons:

- administration and management of our Services;
- as part of our business processes and relevant activities including auditing, business planning, accounting and transactions;
- compliance with legal and regulatory obligations;
- for research, statistical purposes or to improve our Services,;
- to notify you about changes to our Services;
- to improve our site to ensure content is presented in the most effective manner for your computer;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

This is not an exhaustive list and is subject to change where business, legal or regulatory requirements may dictate. We may combine information received from other sources with information we collect about you for the purposes set out above.

How we may keep, store and dispose of data

We hold data in various forms including electronic databases, computerised files and paper files. Data will be held for a reasonable period of time, which may include a period of time after a plan ends. Data will be disposed of in line with approved company processes to ensure all reasonable efforts and precautions are taken to protect the confidentiality of the data. We may continue to keep non-personally identifiable data for the research and statistical purposes to improve our Services.

Who we may share data with

We may disclose data to selected third parties for the purpose of administering the services, including the following:

- service providers;
- sub-contractors in technical payment and delivery services;
- analytics providers and search information providers;

- credit reference agencies for the purposes of assessing your credit score where this is a condition of us entering into a contract with you; and
- any legal or regulatory organisation provided that we are under a duty to disclose or share your personal data in order to comply with any legal obligation. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

If you have appointed an insurance adviser we will send them copies of correspondence relating to the plan and any renewal documentation. We may disclose information about a claim to them, although no medical information will be provided without your consent. Your information, and that of others also covered by the plan, may be disclosed to other parties (for example other insurance companies) with a view to preventing fraudulent or improper claims.

In order to help you maximise the benefits of our policies, we will disclose limited data to:

- brokers regarding your engagement with the Services, as they are well-placed to promote the benefits of the Services and ensure you receive the most from your plan;
- prospective new partners in order for us to develop and improve the Services; and
- where your insurance is paid for by an employer, we may provide non-personally identifiable data to the employer to allow them to assess the impact on their workforce.

In all cases we adopt privacy enhancing technologies as promoted by the ICO and in accordance with EU guidance.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of the Services, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Marketing

You have the right to ask us not to process your personal data for marketing purposes. We will always inform you (before collecting your data) if we intend to use your data for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by sending us a secure message, by contacting our customer services department or by sending us an email at contactus@nolanross.co.uk

Your rights to request, review and amend personal data

You have the right to request a copy of the data we hold about you and to have any inaccurate data corrected. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. If you wish to request this data, please contact the Subject Access Request team:

Email: contactus@nolanross.co.uk

Post: Nolan Ross Limited, Viscount house, River Lane, Saltney, Chester, Cheshire, CH4 8RH

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or post. Please check back frequently to see any updates or changes to our privacy policy.

Telephone Calls

All calls are monitored and recorded for training and compliance purposes.

Call charges may vary.

Unless indicated lines are open Monday to Friday, 10.00 am to 7.00pm.

The Nolan Ross Limited - Cookie Policy

At Nolan Ross, we want you to have the best online experience possible. To help us do this, we use cookies to understand how our customers navigate around our website and to help them in doing so. We use the information provided through cookies to find ways to improve the website experience, but please don't be alarmed, the cookies we use do not contain your personal information, nor can you, or any other customer be identified from them. They merely inform us of activity on the website and recognise your device.

By using our website, you agree that we can place cookies on your device.

Below we explain more about how and why we use them, and how you can manage your cookie settings.

What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device. You can find more information about cookies

at www.allaboutcookies.org and www.youronlinechoices.eu for a video about cookies visit www.google.co.uk/goodtoknow/data-on-the-web/cookies

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide. A list of all the cookies used on this website by category is set out below.

Our cookies:

Strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

Accepting these cookies is a condition of using the website, if you prevent these cookies we can't guarantee or predict how our website will perform during your visit.

Our strictly necessary cookies:

Java session cookies	A unique session identifier assigned by a WebServer, which lasts for the duration of the current session on the website.
Persistent cookies	Encrypted cookies used within the Intermediary Zone Authenticated session to store certain relevant detail used by the application.

Performance cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

By using our website, you agree that we can place 'Performance cookies' on your device. Accepting these cookies is a condition of using the website, if you prevent these cookies we can't guarantee or predict how our website will perform during your visit.

Our performance cookies:

Google Analytics	Google Analytics service offered by Google that generates detailed statistics about the visitors to a website. Their cookies are used to store details how long a visitor spends on a website and where
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	they came from. We use the information to improve the website. The Google Analytics Opt-out Browser Add-on is available for Internet Explorer, Google Chrome, Mozilla Firefox, Apple Safari and Opera. <u>Google Analytics Opt-out Browser Add-on</u>
Adinsight	Adinsight Clarity is visitor level call tracking and call analytics solution that identifies callers using the website by giving them a unique number to call which is stored in a cookie. We use the information to improve the website. For opt out information contact <u>support@adinsight.eu</u> or visit <u>http://www.adinsight.com</u>

Functionality cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

By using our website, you agree that we can place 'Functionality cookies' on your device. Accepting these cookies is a condition of using the website, if you prevent these cookies we can't guarantee or predict how our website will perform during your visit.

Our functionality cookies:

Persistent cookie	A plaintext cookie which stores the last username entered when "Remember me" was selected. Eg. Geoffrey456
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Targeted cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Preventing these cookies may stop us from offering you some services. All of these cookies are managed by third parties, and use the third parties' own tools to prevent these cookies.

Targeted cookies:

DoubleClick	This cookie is used to provide you with more relevant advertising across websites and limit the number of times that a given advert is shown to you. It does not collect personally identifiable information. To opt out of targeted advertising from DoubleClick across all websites please visit http://www.google.co.uk/policies/privacy/ads/
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To opt out of any of the above cookies you will need to change your browser settings. For further details please visit the relevant provider –

- Internet Explorer - <http://windows.microsoft.com/en-gb/windows/support>
- Chrome - https://www.google.com/intl/en_uk/chrome/browser/
- Safari - <http://www.apple.com/support/safari/>
- Firefox - <http://support.mozilla.org/en-US/home>
- Opera - <http://www.opera.com/help>

Additional information:

- <http://www.aboutcookies.org>
- <http://www.ico.org.uk/>
- <http://www.iabuk.net/>