

## HEBW Howden Employee Benefits & Wellbeing Cookie Policy

**Effective date: 19<sup>th</sup> August 2019**

Like many companies, Howden Employee Benefits & Wellbeing use technology on our website ([www.howdengroup.co.uk/uk-en/employeebenefits](http://www.howdengroup.co.uk/uk-en/employeebenefits)) and in our marketing campaigns to collect information that helps us enhance your online experience, discover how you use our website, and measure the effectiveness of those campaigns.

We respect your concerns about privacy and value the relationship we have with you. The cookies we use allow our website to work and help us to understand what information is most useful to visitors.

### **What are cookies?**

A cookie is a text file containing information which is downloaded to your desktop or laptop computer, tablet or mobile device when you visit our website. Cookies are useful because they allow our website to recognise your device. Cookies are then sent back to our website on each time you visit, enabling the website to “remember” you or your device. A cookie cannot read data off your hard drive or read cookie files created by other sites.

When we refer to cookies throughout this Policy, we intend to cover all similar devices including web beacons and log files. You can find more information about cookies at

- All About Cookies ([www.allaboutcookies.org](http://www.allaboutcookies.org))
- Your Online Choices (<http://www.youronlinechoices.com/uk/>) or
- About Cookies ([www.aboutcookies.org](http://www.aboutcookies.org)).

### **The information we collect and why**

Part of creating an enjoyable and lasting experience for our customers is to use cookies to process information in order to better understand what you want from our site. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your device.

Examples of the types of information we collect via cookies are:

- How often you visit our website, the pages you visited on our website, your click-through on our website and the total time you spent on our website;
- The website you visited before our website;
- Whether you have visited our website before or if you are a new visitor;
- Your viewing preferences (e.g. layout, sizing preferences, language, etc.); and
- Your IP address, browser type and operating system, for system administration and to report aggregate information to our advertisers. Also, to enable us to recognise you when you return to our website;

Please note: we do not collect your name or email address via cookies.

Cookies help us to improve our site and to deliver a better and more personalised service. They enable us to:

- Estimate our audience size and usage pattern
- Store information about your preferences, and so allow us to customise our site according to your individual interests
- Speed up your searches
- Customise your visit: we may use information from your visit to help improve your next visit to our site; and
- Look at customer trends: we compile information from thousands of customer visits and analyse it as a whole. This kind of study focuses on identifying trends among the many visitors to our site rather than analysing information about any individual customer.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you visit or log on to our website.

### **The type of cookies we use**

When you use our website, the following categories of cookies may be set on your device:

#### *First-party cookies*

These cookies are set by Howden Employee Benefits & Wellbeing and can be:

- Analytics cookies – These cookies collect statistical (aggregated and anonymous) information about the use of the website by you and other visitors. This information allows Howden Employee Benefits & Wellbeing to enhance the functionality of our website.
- Functionality – 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.

#### *How long cookies are stored on your device*

The length of time cookies are stored on your device can vary, but they generally fall into two categories: temporary session or persistent cookies.

#### *Temporary session cookies*

We use temporary session cookies on all of our secure pages to assign and store a session ID to you so that you can move uninterrupted between the areas of our site. This session ID is also used for internal reporting purposes. It is not personally identifiable to you, and this type of cookie does not leave any retrievable information on your hard drive. Most of our first-party cookies are session cookies which expire when you close your internet browser.

*Persistent cookies*

Our first-party analytics cookies are persistent cookies because these are used to help us understand visitor patterns over a longer term or to provide additional functions you have requested in relation to site customisation and saved or stored content. These can be stored on your computer for 24 hours, a week, or several years, depending on the function these are helping to perform.

**The cookies we use on this website**

We use the cookies detailed below:

Cookie	Name	Purpose	More information
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">An overview of privacy at Google</a>
Site cookie acceptance	cookies-allowed	This cookie is used to record that a user has accepted the use of cookies on this website. It expires after one year.	
Underlying system	PHPSESSIONID	This cookie is used by the underlying system	

**Marketing**

In order for us to measure the effectiveness of our marketing communications we collect the following information:

- Click-through – where you have clicked on one or more links contained in an email;
- Conversion – where you have clicked on a link within an email and completed a desired action, such as purchasing a product;
- Email Sharing/Forwarding – where you have clicked on a “share this” button to post email content to a social network, and/or clicked on a “forward to a friend” button
- Unsubscribes – where you click on the unsubscribe link;
- Bounces – emails sent that could not be successfully delivered to the recipient’s inbox;

We will only send you relevant news about our products and services in a number of ways including by email, but only if you have previously agreed to receive these marketing communications. When you make an enquiry via our website we will ask if you would like to receive marketing communications.

## How to manage cookies

We will only set cookies on your device if you have provided consent. If you are concerned about having cookies on your device, you can use your browser settings to:

- delete all cookies;
- block all cookies;
- allow all cookies;
- block third-party cookies;
- clear all cookies when you close the browser;
- open a 'private browsing' / 'incognito' session, which allows you to browse the internet without storing local data;
- notify you each time new cookies are placed on your device; and
- install add-ons and plug-ins to extend browser functionality.

You can find out more information about controlling cookies from:

- Internet Explorer
- Chrome
- Firefox
- Safari
- Opera

In addition, if you use Firefox or Internet Explorer 11 there is an option to turn on the '*Do Not Track*' functionality, which allows you to tell websites not to track you. Google has also published a browser add-on to allow you to choose what information about your websites you visit is sent to Google Analytics, this can be downloaded [here](#). Full details on the cookies set by Google Analytics are published on the Google website.

**Please note:** if you choose to disable some or all cookies, you may not be able to make full use of our website and some useful features will not work.

## Changes to the policy

We will inform you of any changes to this policy by dedicated service emails or by notification on this website.

If you have any questions or concerns regarding our use of cookies, or if you want to exercise your right to access your data and/or have any information we hold about you rectified, you can contact us. You will also find more information about how we process your information in our Privacy Policy.

### What data we hold and how we use it

The information we will or may process about you is listed below:

Individual making an initial enquiry to us	A member of a group scheme	A claimant on a group scheme	A member of a flexible benefits scheme
<ul style="list-style-type: none"> <li>Name (First, Last or Middle)</li> <li>Residential or Correspondence Address</li> <li>Personal or Business E-mail</li> <li>Tel No. (Landline, Mobile, Business, Fax)</li> <li>Date of Birth (incl. Year of Birth)</li> <li>Age</li> <li>Gender</li> <li>Marital Status</li> <li>Bank Account Details</li> <li>Credit / Debit Card Details</li> <li>Physical Description</li> <li>Audio / Voice-mail</li> <li>Title or Position</li> <li>Comment / Opinions</li> <li>Marketing Preferences</li> <li>Signature</li> <li>Health Information (Physical or Mental)</li> </ul>	<ul style="list-style-type: none"> <li>Name (First, Last or Middle)</li> <li>Residential or Correspondence Address</li> <li>Personal or Business E-mail</li> <li>Tel No. (Landline, Mobile, Business, Fax)</li> <li>Date of Birth (incl. Year of Birth)</li> <li>Age</li> <li>National Insurance Number</li> <li>Gender</li> <li>Marital Status</li> <li>Nationality</li> <li>Social, Leisure &amp; Lifestyle</li> <li>Absence Records</li> <li>Employment Status</li> <li>Employment Benefits</li> <li>Employee No. / ID</li> <li>Next of Kin / Beneficiaries</li> <li>Remuneration / Salary Details</li> <li>Physical Description</li> <li>Title or Position</li> <li>Comment / Opinions</li> <li>Pension Details</li> <li>Other Income (Interest, Dividends)</li> <li>Health Information (Physical or Mental)</li> <li>Beneficiaries</li> </ul>	<ul style="list-style-type: none"> <li>Name (First, Last or Middle)</li> <li>Residential or Correspondence Address</li> <li>Personal or Business E-mail</li> <li>Tel No. (Landline, Mobile, Business, Fax)</li> <li>Date of Birth (incl. Year of Birth)</li> <li>Age</li> <li>National Insurance Number</li> <li>Gender</li> <li>Marital Status</li> <li>Nationality</li> <li>Absence Records</li> <li>Employment Status</li> <li>Employment History</li> <li>Employment Benefits</li> <li>Employee No. / ID</li> <li>Educational Details</li> <li>Next of Kin / Beneficiaries</li> <li>Remuneration / Salary Details</li> <li>Compensation Details</li> <li>Audio / Voice-mail</li> <li>Title or Position</li> <li>Pension Details</li> <li>Other Income (Interest, Dividends)</li> <li>Signature</li> <li>Health Information (Physical or Mental)</li> <li>Beneficiaries</li> </ul>	<ul style="list-style-type: none"> <li>Name (First, Last or Middle)</li> <li>Residential or Correspondence Address</li> <li>Personal or Business E-mail</li> <li>Tel No. (Landline, Mobile, Business, Fax)</li> <li>Date of Birth (incl. Year of Birth)</li> <li>Age</li> <li>National Insurance Number</li> <li>Gender</li> <li>Marital Status</li> <li>Nationality</li> <li>Social, Leisure &amp; Lifestyle</li> <li>Absence Records</li> <li>Employment Status</li> <li>Employment Benefits</li> <li>Employee No. / ID</li> <li>Next of Kin / Beneficiaries</li> <li>Remuneration / Salary Details</li> <li>Tax Code / ID</li> <li>Physical Description</li> <li>Title or Position</li> <li>Comment / Opinions</li> <li>Pension Details</li> <li>Other Income (Interest, Dividends)</li> <li>Health Information (Physical or Mental)</li> <li>Beneficiaries</li> </ul>

We will use your personal data to advise our client on protection, healthcare and other employee benefit schemes and wellbeing programmes, arranging such schemes with insurers and other benefits providers,

and managing and administering such schemes and programmes. In order to do this, we have to provide that information to the insurers and other benefits providers with whom we deal, to enable them to consider whether they are willing to provide the cover/benefits requested and, if so, on what terms. Those insurers and benefit providers will receive your data as independent controllers, and will be responsible for processing your data in accordance with the General Data Protection Regulation ('GDPR'). They will have their own privacy notices and documentation setting out how and why they process your personal data. A full list of the insurers and other benefits providers we currently deal with can be found [here](#).

We may provide the service to our client through any member company of the Hyperion Insurance Group. In such case, they will act as controllers and will comply with the terms of our agreement with our client and this privacy notice.

In particular, Psyon, a trading name of Risk Policy Administration Limited ("RPA") will provide some wellbeing services and manage the Gladis and Portal systems through which data relating to protection, health and other employee benefit schemes and wellbeing programmes, including your personal data, is obtained from you or your employer, and communicated to insurers and benefits providers. Some service providers who provide to us the infrastructure to enable us to provide the services, may have access to your personal data as our processors under the terms of agreements that limit the use of your data to that necessary to provide services to us, and contain other mandatory protections for your data. It is our intention, wherever possible, to avoid transferring your personal data outside the European Economic Area, but if it is, Model Clauses or other mechanisms approved by the European Commission or the Information Commissioner's Office (the UK data protection regulator ("ICO")) will be put in place. On your request, to our contact details below, we will provide you with a copy of the relevant Agreement or details of the other mechanism.

We may also occasionally share your data with our legal and other professional service providers, when necessary to obtain appropriate advice.

We, RPA and other companies in the Hyperion Insurance Group may create, use and provide to our customers and other third parties non-personalised, aggregated statistical, trend and risk analyses ("**Statistical Data**") from the information provided to us, but that Statistical Data will not identify our customer or contain any of your or any other individual's personal data.

We do not carry out any automated individual decision-making using your personal data.

## Storage

We will only keep your personal data for as long as we need to in order to fulfil the purposes for which it was collected, and as set out in our privacy notice, and for as long as we are required to keep it by law or regulatory requirements, or need to keep it for the establishment, exercise or defence of legal claims.

## Your rights

You have the following rights which can be exercised by contacting us via the contact details set out below:

- To access personal data held about you, and where our processing is based on your consent, to have that data transferred to another controller, where technically feasible.;
- To request the rectification or completion of personal data which is inaccurate or incomplete;

- In certain circumstances, to restrict or object to the processing of your personal data or to request its erasure;
- To lodge a complaint with the ICO.

You can obtain further information about your rights from the Information Commissioner's Office ('ICO') at [www.ico.org.uk](http://www.ico.org.uk) or via their telephone helpline (0303 123 1113).

The personal data we hold about you is used to arrange and manage a protection, health and/or other employee benefit scheme, and/or a wellbeing programme for our client, and for this purpose, we may from time to time request further information from you. If you fail to provide such information, or request that the personal data we already hold is erased or restricted, this may affect your benefits under the scheme/programme or our ability to manage them.

### Contact us

If you need or want to contact us, or our Data Protection Officer, our respective contact details are set out below.

We are part of the Hyperion Insurance Group and our business contact details are:

<b>Registered office:</b>	One Creechurch Place, London EC3A 5AF
<b>Telephone:</b>	020 3327 5700
<b>E-mail:</b>	<a href="mailto:info@howdengroup.com">info@howdengroup.com</a>
<b>Website:</b>	<a href="http://www.howdengroup.com">www.howdengroup.com</a>
<b>Twitter:</b>	@Howden_EB
<b>LinkedIn:</b>	<a href="https://www.linkedin.com/showcase/howden-employee-benefits-&amp;-wellbeing/">https://www.linkedin.com/showcase/howden-employee-benefits-&amp;-wellbeing/</a>

The contact details of our Data Protection Officer is:

<b>Name:</b>	Owen Davies
<b>Address:</b>	One Creechurch Place, London EC3A 5AF
<b>Telephone:</b>	020 3327 5700
<b>E-mail:</b>	<a href="mailto:dpo@howdengroup.com">dpo@howdengroup.com</a>