

Privacy Policy

Effective date: 16 January 2019

MatBlas Ltd ("us", "we", or "our") operates The P&C Insurance Digest™ through the www.insurance-digest.com website and any related mobile applications (hereinafter referred to as the "Service").

This Privacy Policy informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data. This Privacy Policy must be read in conjunction with our cookies statement and Terms and Conditions of Use.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions of Use.

1. Definitions

- 1.1. **Service:** Service means the www.insurance-digest.com website and any mobile applications operated by MatBlas Ltd.
- 1.2. **Personal Data:** Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- 1.3. **Usage Data:** Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- 1.4. **Cookies:** Cookies are small files stored on your device (computer or mobile device).

- 1.5. **Data Controller:** Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are the Data Controller of your Personal Data.

- 1.6. **Data Processors (or Service Providers):** Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of third party Service Providers in order to process your data more effectively.

- 1.7. **Data Subject (or User)**

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

2. Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

- 2.1. **Usage data:** When users come to the website, we may track, collect and aggregate information indicating, among other things, which pages of our website were visited, the order in which they were visited, when they were visited, and which hyperlinks were "clicked." We also collect information from the URLs from which you linked to our website. Collecting such information may involve logging the IP address, operating system and browser software used by each user of the website. We may be able to determine from an IP address a user's Internet Service Provider and the geographic location of his or her point of connectivity.

- 2.1.1 We also use (or may use) cookies and web beacons when you visit our website. For more information

on our use of cookies and web beacons, please refer to our Cookie Policy.

2.2. Personal data: We collect Personally Identifiable Information that you provide to us when you register for an account, update or change information for your account, purchase products or services, complete a survey, sign-up for email updates or Online Courses, participate in our public forums, send us email messages, and/or participate in Online Courses or other services on our Service. We may use the Personally Identifiable Information that you provide to respond to your questions, provide you the specific course and/or services you select, send you updates about Online Courses offered by MatBlas or other MatBlas events, and send you email messages about Service maintenance or updates.

2.2.1. Account Registration. If you register for an account on our website, you may be required to provide us with Personally Identifiable Information such as your name and email address.

2.2.2. Updates. MatBlas may offer you the ability to receive updates either via email or by posting on portions of the website only accessible to registered users. In order to subscribe to these services, you may be required to provide us with Personally Identifiable Information such as your name and email address.

2.2.3. Forums. MatBlas may offer public forums from time to time (the "Forums") where you can share comments and thoughts. In order to participate in the Forums, you may be required to register with us and/or provide us with Personally Identifiable Information such as your name, a user name and email address. Please keep in mind that information you post or make available in Forums will be publicly available and should comply with the Terms and Conditions of Use of the Service. You should not post any

Personally Identifiable Information or other information of a personal or sensitive nature, whether relating to you or another person, on a Forum. Please also reference our Terms and Conditions of Use for our Code of Conduct and additional information about proper use of our Forums.

2.2.4. Participation in Online Courses.

MatBlas offers users the opportunity to participate in an Online Course on or through the website. If you desire to participate in a course, you will be asked to provide us with certain information necessary to conduct such a course. This information may include, among other things, your name and email address. If you participate in an online course, we may collect from you certain user-generated content, such as login history, time and date modules have been accessed and completed, graded assessments and feedback. You should not include any Personally Identifiable Information or other information of a personal or sensitive nature, whether relating to you or another person, on assignments, exams, or surveys, except for information required to participate or submit such assignments, exams, or surveys.

2.2.5. Surveys. We may receive Personally Identifiable Information when you provide information in response to a survey operated by us. This may include details about your race, your education history, and your employment.

2.2.6. Partner sites. Partner sites providing Online Course related tools and services to MatBlas users may collect nonfinancial individual level user data regarding the individual's use of that partner site while engaged with such Online Course related activities, and the partner sites may share that data with MatBlas for the purpose of improving MatBlas's services, the partner site's services, and the individual's education experience. This data includes

information such as the amount of time spent on the partner site and pages viewed.

2.2.7. **Third Party Credit Card Processing.**

MatBlas provides you with the ability to pay for Online Courses and other services using a credit card through PayPal. Please note that our service provider – not MatBlas – collects and processes your credit card information.

3. **Tracking Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

4. **Use of Data**

MatBlas Ltd uses the collected data for the following purposes:

- To provide and maintain our Service.

- To notify you about changes to our Service.
- To allow you to participate in interactive features of our Service when you choose to do so.
- To monitor account activity and progress of selected courses.
- To monitor completion of a selected course and issue certificates of completion.
- To provide customer support.
- To gather analysis or valuable information so that we can improve our Service.
- To monitor the usage of our Service.
- To detect, prevent and address technical issues.
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

5. **Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)**

5.1. If you are from the European Economic Area (EEA), MatBlas Ltd legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

5.2. MatBlas Ltd may process your Personal Data because:

- We need to perform a contract with you.
- You have given us permission to do so.

- The processing is in our legitimate interests and it is not overridden by your rights.
- To comply with the law.

6. Retention of Data

- 6.1. MatBlas Ltd will retain your Personal Data from your membership account only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.
- 6.2. MatBlas Ltd reserves the right to retain your Personal Data after an account has been closed in order to comply with our legal obligations.
- 6.3. MatBlas Ltd will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

7. Transfer of Data

- 7.1. Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.
- 7.2. If you are located outside The United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to The United States of America and other countries and process it there. Your consent to this Privacy Policy followed by

your submission of such information represents your agreement to that transfer.

- 7.3. MatBlas Ltd will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

8. Disclosure of Data

- 8.1. **Disclosure for Law Enforcement:** Under certain circumstances, MatBlas Ltd may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
- 8.2. **Legal Requirements:** MatBlas Ltd may disclose your Personal Data in the good faith belief that such action is necessary to:
- To comply with a legal obligation.
 - To protect and defend the rights or property of MatBlas Ltd.
 - To prevent or investigate possible wrongdoing in connection with the Service.
 - To protect the personal safety of users of the Service or the public.
 - To protect against legal liability.
- 8.3. **Contractual Requirements:** for members under a Corporate Licence agreement, or Pay-as-you-learn users sponsored or financed by their employers or any other third party, MatBlas Ltd may have the legal and contractual obligation to disclose your Personal and Usage Data to your employer or sponsored party.

9. Security of Data

- 9.1. The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.
- 9.2. By using our Services you agree to take all reasonable care and measures to keep you login information and account secure. Do not share your user name and password information with anyone and avoid using public computers to access any of our material.
- 9.3. You should avoid, to the extent possible, using unsecured public networks while accessing our services.

10. Your Data Protection Rights under the General Data Protection Regulation (GDPR)

- 10.1. If you are a resident of the European Economic Area (EEA), you have certain data protection rights. MatBlas Ltd aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.
- 10.2. If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.
- 10.3. In certain circumstances, you have the following data protection rights:
 - **The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions

yourself, please contact us to assist you.

- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where MatBlas Ltd relied on your consent to process your personal information.

10.4. Please note that we may ask you to verify your identity before responding to such requests. While we may take every necessary step to comply with your request, we may be prevented to doing so by law.

10.5. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

11. Service Providers

- 11.1. We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related

services or assist us in analysing how our Service is used.

- 11.2. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

12. Analytics

We may use third-party Service Providers such as Google Analytics to monitor and analyse the use of our Service.

- 12.1. **Google Analytics** is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

We have implemented reCAPTCHA on the website and its use is subject to the Google [Privacy Policy](#) and [Terms of Use](#). reCAPTCHA may be only used to fight spam and abuse on the website. reCAPTCHA is not be used for any other purposes such as determining credit worthiness, employment eligibility, financial status, or insurability of a user.

By using the website, you agree to the Google [Terms of Use](#).

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

13. Links to Other Sites

- 13.1. Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

- 13.2. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

14. Children's Privacy

- 14.1. Our Service does not address anyone under the age of 18 ("Children").
- 14.2. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

15. Changes to This Privacy Policy

- 15.1. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.
- 15.2. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.
- 15.3. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

16. Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: info@insurance-digest.com
- By phone number: +44 (0) 20 7510 9690
- By post: MatBlas Ltd, Davenport House, 16 Pepper Street, London E14 9RP