

Connectbatch Limited Privacy Notice

Connectbatch Limited Privacy Notice (London Market Processing)

Contact: dpo@connectbatch.co.uk

ICO: <https://ico.org.uk>

AI Transparency Statement

Connectbatch Limited uses Artificial Intelligence (AI) to automate the extraction and digitisation of insurance-related documents, including broker slips, endorsements, schedules, and claims correspondence. AI is used under strict governance, with human oversight from insurance professionals. No customer or market data is used to train AI models, and we do not repurpose data for model development or research. All outputs are subject to validation by authorised users.

Compliance References

Our processing complies with:

- UK GDPR & Data Protection Act 2018
- FCA Handbook expectations (SYSC, Principle 6 & 7)
- Lloyd's/Market Association data handling guidance
- Applicable contractual and data security obligations

Introduction

This Privacy Notice explains how Connectbatch Limited processes personal and business data when providing AI-enabled document automation services to organisations in the London Insurance Market. "Processing" includes collecting, storing, analysing, sharing, or deleting data.

We are committed to transparency and protecting data in line with regulatory expectations, industry standards, and contractual obligations.

Market Users / Customers

What Data Do We Process?

Depending on the use of our platform, we may process:

- **Business and personal details:** Names, job roles, contact information.
- **Insurance documentation data:** Information contained in broker slips, schedules, endorsements, claims files, emails, and supporting documents.
- **Technical data:** IP addresses, usage logs, authentication information.

We do not process special category data unless explicitly required for claims or underwriting purposes and instructed by you under contract.

Why Do We Process This Data?

We process your data because:

- It is necessary for the performance of a contract with insurers, brokers, or market participants.
- We have a legitimate interest in providing secure, accurate document processing services.
- We must comply with FCA expectations for operational resilience and data governance.
- Where required, we process data with your consent (e.g., for optional platform features).

Confidentiality Obligations

We comply with industry confidentiality standards by:

- Processing data only as instructed by clients.
- Applying strong access controls and audit trails.
- Restricting internal access to authorised personnel.
- Disclosing information only where legally required or contractually permitted.

Where Do We Collect and Process Data?

Data may come from:

- You or your authorised representatives
- Insurance carriers, brokers, MGAs, TPAs
- Approved third-party systems (e.g., document management platforms)

We collect data through secure upload portals, encrypted email, or automated integrations.

Staff and Operational Data

We process staff information (e.g., employment records, payroll, training) where required for employment, regulatory compliance, and access control functions.

How Do We Store Your Information?

Data is stored securely using encryption and industry-approved security controls.

We follow relevant retention periods based on:

- Contractual provisions
- FCA record-keeping expectations
- Market Association/Lloyd's guidelines

After retention expires, data is securely deleted or anonymised.

Data Security Expectations

We implement technical and organisational measures aligned with:

- FCA cyber-resilience guidance
- London Market data security frameworks
- UK GDPR Article 32 requirements

These include encryption, access control, logging, monitoring, and regular testing.

Data Breach Notification Procedure

Connectbatch Limited maintains a documented incident response and breach procedure that includes:

- **Immediate Assessment:** Rapid review of any suspected breach.
- **Containment & Recovery:** Steps to prevent further access.
- **Notification:**
 - ICO notification within 72 hours when required under UK GDPR.
 - Notification to affected clients where risks are identified.
- **Documentation:** Full internal breach log and remediation record.

Where insurance market data is involved, we follow applicable contractual and regulatory reporting obligations.

Your Rights

You have rights under UK GDPR, including:

- Access, correction, erasure, restriction, objection, portability
- Withdrawal of consent for optional processing

Contact dpo@connectbatch.co.uk to exercise your rights. Complaints may be lodged with the **ICO**.

Website

Our website may collect technical data such as IP addresses and analytics information for security and usage optimisation. See our Cookie Policy for details.