

## Privacy policy

We understand your privacy and security concerns regarding the information we collect, use and disclose to third parties for the purpose of allowing us to provide and offer our products and services to you. To notify you about our practices, we have developed this Privacy Policy. Any personally identifiable information collected on this Site is considered Personal Information ("Personal Information") and will be treated in accordance with this Privacy Policy. Chesterfield is firmly committed to protecting your privacy and the confidentiality of your Personal Information.

# COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Chesterfield is committed to protecting the privacy of Internet users who visit Chesterfield's web site, located at www.Chesterfieldgroup.com (the "Site").

The information gathered by Chesterfield from this Site falls into two categories: (1) information voluntarily supplied by visitors to our Site and (2) tracking information gathered as visitors navigate through our Site.

## Information voluntarily provided by you

When using this Site, you may choose to provide us with information to help us serve your needs. For example, you may provide us your e-mail address to request information, or you may send us your mailing address so we may send you the material you have requested. Any Personal Information that you send us will be used only for the purpose indicated on the Site or in this policy. We may also use your information to provide you with information about other services and products that are offered by Chesterfield or our affiliated companies that we think may be of interest to you. If you do not wish to be contacted by us, please see the section titled "Opting-Out" below.

#### Cookies

This Site may use cookies. Cookies are pieces of information stored by your web browser on behalf of a web site and returned to the web site on request. The only Personal Information a cookie can contain is information you supply. A cookie cannot read data off your computer's hard drive.

If this Site uses cookies, certain pages of the Site may not function properly if the cookies are turned off. Please consult your web browser's Help documentation for more information about how to turn cookies on and off for your browser. Cookies are placed on your computer, and accordingly we neither store cookies on our computers nor forward them to any external parties. The information that may be maintained by a cookie is used by Chesterfield solely to help us manage the Site, improve features of the Site and understand usage patterns. This may include such items as: username, the pages visited on the Site; the date and time of the visit; the internet address of the referring site; the version of browser used; the capabilities of the browser; and the search terms used on our search engines.

## Disclosure or use of personal information

We will not exchange or sell or otherwise distribute your Personal Information without your consent outside the Chesterfield Group, except in accordance with your instructions, or if it is already in the public domain, or it has been received independently from a third party whom we reasonably believed was permitted to supply such information to us, or as identified in this privacy policy:

In the normal course of performing services for our clients, information may be shared within Chesterfield Group and may be used both for research and statistical purposes and crime prevention. It may be transferred to any country, including countries outside the European Economic Area, for any of these purposes and for systems administration. It may also be used to provide our clients with information about products and services that we believe could be of interest, by post, by telephone, e-mail, or other means. When our clients supply us with information containing third party personal data (names, addresses, or other information relating to living individuals), we will hold and use that data to perform general insurance and other services for those clients on the understanding that the individuals to whom the data relates have been informed of the reason(s) for obtaining the data and the fact that it may be disclosed within the Chesterfield Group.

Agents and Service Providers. We sometimes contract with other companies and individuals to perform functions or services on our behalf, such as hosting this Site, sending e-mail messages and making phone calls on our behalf. They may have access to Personal Information, such as addresses, needed to perform their functions, but are restricted from using it for purposes other than providing services for Chesterfield. Business Transfers. As we continue to develop our business, we might sell or buy assets. In such transactions, user information generally is one of the transferred business assets. Also, if either Chesterfield itself or substantially all of Chesterfield assets were acquired, your Personal Information may be one of the transferred assets.

Chesterfield may preserve and has the right to disclose without your prior permission any information about you or your use of this Site if Chesterfield has a good faith belief that such action is necessary to: (a) Protect and defend the rights, property or safety of Chesterfield Group, employees, other users of this Site, or the public; (b) Enforce the terms and conditions that apply to use of this Site, or (c) Respond to claims that any content violates the rights of third-parties. We may also disclose information as we deem necessary to satisfy any applicable law, regulation, legal process or governmental request.

#### External links

Chesterfield includes links to other websites whose privacy policies we do not control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the site you are visiting. That policy may differ from ours. If you can't find the privacy policy of any of these sites via a link from the site's homepage, you should contact the site directly for more information.

#### Information storage and security

Information collected through this Site is processed and stored in England. If you are located outside England, by providing information to Chesterfield through the use of the Site you are consenting to the transfer of the information to England for processing in accordance with this Privacy Policy. We have in place physical, electronic, and procedural safeguards appropriate to the sensitivity of the Personal Information we collect, use, and maintain. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We ask that you do your part by maintaining in strict confidence any computer passwords you use to access the Internet or this Site.

## Chesterfield Ltd is not interested in minors

You must be at least 18 years old and possess the legal authority to form legally binding contracts under applicable law to use this Site and the services provided on it. Chesterfield does not knowingly collect Personal Information from those under the age of 18. In an instance where such information was collected, it would be purely accidental and unintentional. Chesterfield encourages parents to discuss the Internet with their children and monitor Personal Information that a child may provide via the Internet.

# Policy updates

This privacy policy was created on 19th February 2007. We may update this privacy policy from time to time. When we do so, changes in our privacy policy will be effective immediately. If you are a regular visitor to this Site, we recommend that you check this privacy policy on a regular basis.

## **Contact Information**

1) Privacy Policy Questions regarding this Privacy Policy should be directed to us at the following address:

Chesterfield Insurance Brokers Ltd.

Attn: Head of Compliance

St Clare House, 30/33 Minories, London, EC3NR 1DD Chesterfield Ltd

### 2) Opting Out

If when using this Site, you have previously furnished us with contact information but now do not want to receive further communications which are not necessary to provide you with services, please let us know at:

enquiries@chesterfieldgroup.co.uk