



[Privacy Policy](#)

At Source Commercial we're committed to protecting and respecting your privacy. Whilst this website is aimed at financial intermediaries, we do understand our customers may occasionally use this website.

Therefore we have a slightly different Privacy Policy for our customers which can be requested at any time.

Who are we?

Source Commercial is a trading style of Red Apple Risk Solutions Limited. This privacy policy explains how we use any personal information we collect from you throughout the duration of your contract with us.

You can reach us at any time on 02921 677140, by email at commercial@sourcecommercial.co.uk or by post at Suite 7, 33-35 West Bute Street, Cardiff, CF10 5LH. We are registered in England and Wales no. 08365670.

We process your personal information in order to carry out the legitimate interests of providing an agency to refer clients and where relevant to provide access to our system to allow you to obtain insurance quotes for your clients, and to enable payment of commission to you or your network.

You have a right to complain about the way your data is treated by us to the Information Commissioners Office (ICO) by visiting <https://ico.org.uk/concerns/> or calling 0303 123 1113.

How do we collect information from you?

We collect information about your business, and this will also include limited personal information about you and any other contacts that are included in the agency with us.

We obtain information about you when you use our website, for example, when you register for an agency, refer a client or you contact us about products and services.

What type of information is collected from you?

The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when. If you purchase a product from us and pay by credit or debit card, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.



How will we use this information about you?

We will use this data for the sole purpose of setting up and administrating your agency with us, this will include updates about your clients, informing you of changes to our service and relevant business content and offers, as well as commission statements and payments.

We have established that our lawful basis for processing your data is that it is in our legitimate interest to do so. By doing so it enables us to provide you with an agency and pay you commission, as well as helping us provide you with Product Information, offers and rewards, Risk Management Support and advice.

As a result you have the right to object, and if you wish to do so you must contact us to inform us of this and why you wish to object.

We will continue to process your data throughout the duration of your agency with us. You can stop this by informing us to cancel your agency and cease payment of commissions.

We may share your data with other entities where it is our legal obligation to do so, for example the Financial Conduct Authority.

In processing your data, we may send your details to, and also use information from credit reference agencies and fraud prevention agencies.

How is your information used?

We may use your information to:

- Process policy proposals that you have submitted
- Set up or maintain a broker account
- Carry out our obligations arising from any contracts entered into by you and us
- Dealing with entries into a competition
- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Pay you commission
- Send you communications which you have requested and that may be of interest to you. These may include information about campaigns, information about products, commission Statements, promotions of our associated companies goods and services



We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our obligations to insurers and regulators. We will hold your personal information on our systems only for as long as is necessary for the relevant activity, or as long as is required pertaining to any relevant contract you hold with us.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf:

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure, and not to use it for their own direct marketing purposes. Please rest assured that we will not release your information to third parties beyond Red Apple Risk Solutions Limited for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order, or for the purposes of prevention of fraud or other crime.

Third Party Product Providers we work in association with:

We work closely with various third party product providers to bring you a range of quality and reliable products and services designed to meet the needs of financial intermediaries providing general insurance to their clients. When you have chosen to receive information and updates from us about our products and services, we may use Third Party providers to distribute this information to you. When you enquire about or purchase one or more of these products, the relevant third party insurer may use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third parties will share your information with us which we will use in accordance with this Privacy Policy.

When you are paying for a policy online, your donation is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

We may transfer your personal information to a third party in order to process a policy proposal and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation, to comply with a request from our regulators or to enforce or apply our terms of use or to protect the rights,



property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Your choices

You have a right to object to our processing of your data for our legitimate purposes. If you do not wish to receive direct marketing communication from us, i.e. about the products and services we offer for your clients. Or to help you meet the various demands of your business (including regulatory demands). Then you can unsubscribe from the mailing list at any time, or inform us at the time you set up your agency.

You can change your marketing preferences at any time by contacting us by email: commercial@sourcecommercial.co.uk or telephone on 02921 677140.

How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your email address, or any of the other information we hold is inaccurate or out of date, please email us at: commercial@sourcecommercial.co.uk, or write to us at: Red Apple Risk Solutions Ltd T/A Source Commercial, Suite 7, 33-35 West Bute Street, Cardiff, CF10 5LH. Alternatively, you can telephone 02921 677140.

You have the right to ask for a copy of the information Red Apple Risk Solutions Ltd holds about you. Where we have reason to believe the request is excessive (for example, where you make multiple or repeat requests), we may charge a fee to cover our costs in providing this information. We will provide information requested within one month of the request being received.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with a minimum of 256 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to



access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

Use of 'cookies'

Like many other websites, some parts of the Red Apple Risk Solutions Ltd web site uses cookies. A cookie is a small text file that our web server places on a user's computer hard drive to be a unique identifier. The use of cookies enables Red Apple Risk Solutions Ltd to track usage patterns, enforce security, and deliver customized content to users. Our cookies do not have an expiration date and do not collect personally identifiable information.

The preference to receive cookies automatically is controlled by a preference setting in your web browser. As an option, you can have the browser alert you before accepting cookies and have the option of refusing them. All cookies can also be refused by turning them off in your web browser. However, by refusing cookies, you may not be able to take full advantage of our websites.

Collecting Domain Information

Like most commercial web sites, Red Apple Risk Solutions Ltd automatically logs all traffic coming to and from our web site. Part of this data includes the collection of domain information. This data enables us to become more familiar with which customers visit our site, how often they visit, and what sections of the site are most active. Red Apple Risk Solutions Ltd uses this information to make informed decisions on improving the information and navigation of our site.

Red Apple Risk Solutions Ltd may disclose aggregate statistics about visitors to our site to other third parties. However, any such disclosure will not include any personally identifiable information from any of our visitors.



Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if access is gained using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

Children (16 or Under)

Our websites do not target and are not intended to attract children under the age of 16. Red Apple Risk Solutions Ltd does not knowingly solicit personal information from children under the age of 16 or send them requests for personal information.

Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in May 2018.