

Somerset Bridge Insurance Services Ltd

Data protection audit report

July 2022

Executive Summary

Audit Methodology

The Information Commissioner is responsible for enforcing and promoting compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA18) and other data protection legislation. Section 146 of the DPA18 provides the Information Commissioner's Office (ICO) with the power to conduct compulsory audits through the issue of assessment notices. Section 129 of the DPA18 allows the ICO to carry out consensual audits. The ICO sees auditing as a constructive process with real benefits for controllers and so aims to establish a participative approach.

Somerset Bridge Insurance Services Limited agreed to a consensual audit by the ICO of its processing of personal data for the purposes of direct marketing.

The purpose of the audit is to provide the Information Commissioner and SBISL with an independent assurance of the extent to which SBISL, within the scope of this agreed audit, is complying with data protection legislation.

It was agreed that the audit would focus on the following area(s)

Scope area	Description
Direct Marketing	The processes in place where an organisation undertakes marketing activities directed at customers on their own database and/or obtained from third party lists. This will include controls in place for management structures, policies and procedures, monitoring and reporting, training, fairness and transparency, lawful basis – consent, accuracy and integrity of records, operations and data subjects rights.

Audits are conducted following the Information Commissioner's data protection audit methodology. The key elements of this are a desk-based review of selected policies and procedures, interviews with selected staff, and an inspection of selected records.

A desk-based review of selected policies and procedures and remote telephone interviews were conducted in May 2022.

Summary of Findings

The findings that were made in the course of our audit are summarised below.

SBISL process personal data from customers obtaining insurance quotes and policies. SBISL collect personal data directly from their customers that come through their website, aggregator sites or via telephone calls.

SBISL only rely on active opt in consent for any form of marketing including via email, phone or SMS. SBISL currently does not use soft opt-in.

Electronic marketing is mainly through a monthly newsletter. Each email to the customer includes the option to unsubscribe.

SBISL do not process special category data when processing data for marketing purposes.

Automated marketing calls are not made by SBISL. In addition SBISL do not buy in marketing lists from third parties.

ICO auditors were able to gain a high level of assurance that the direct marketing activities conducted by SBISL were compliant with the UKGDPR, DPA18 and the Privacy and Electronic Communications Regulations (PECR).

Disclaimer

The matters arising in this report are only those that came to our attention during the course of the audit and are not necessarily a comprehensive statement of all the areas requiring improvement.

The responsibility for ensuring that there are adequate risk management, governance, and internal control arrangements in place rest with the management of Somerset Bridge Insurance Services Limited (SBISL).

We take all reasonable care to ensure that our audit report is fair and accurate but cannot accept any liability to any person or organisation, including any third party, for any loss or damage suffered or costs incurred by it arising out of, or in connection with, the use of this report, however such loss or damage is caused. We cannot accept liability for loss occasioned to any person or organisation, including any third party, acting, or refraining from acting as a result of any information contained in this report.

This report is an exception report and is solely for the use of SBISL. The scope areas and controls covered by the audit have been tailored to SBISL and, as a result, the audit report is not intended to be used in comparison with other ICO audit reports.