

# GDPR

## Where are we now?

Data protection regulations are derived from the Information Commissioners Office (ICO) and a new legal framework, the General Data Protection Regulation (GDPR), is being introduced with effect from 25th May 2018. It states that any organisation (data controller/data processor) that holds data on an EU citizen must adhere to the forthcoming rules.

The key changes that will be implemented include:

- The provision of detailing how customer (the data subject) information is collected, stored and used, by whom and where; with greater focus on consent you have to use this data.
- Individuals being given the 'right to be forgotten'. This allows a customer to request their right to be forgotten which means that if a data controller can no longer provide a legitimate reason for storing their data, then it must be deleted (please review the current FCA regulation on the retention of customer data and valid reasons).
- Individuals being granted the right to 'data portability'. This allows the customer to request their information in a readable format from a previous data controller and move it from one provider to another.

This document serves to illustrate how current Open GI functionality is able to assist our broker partners in meeting their own GDPR responsibilities and more specifically on how the new Consent Frame we have developed can assist and be used.

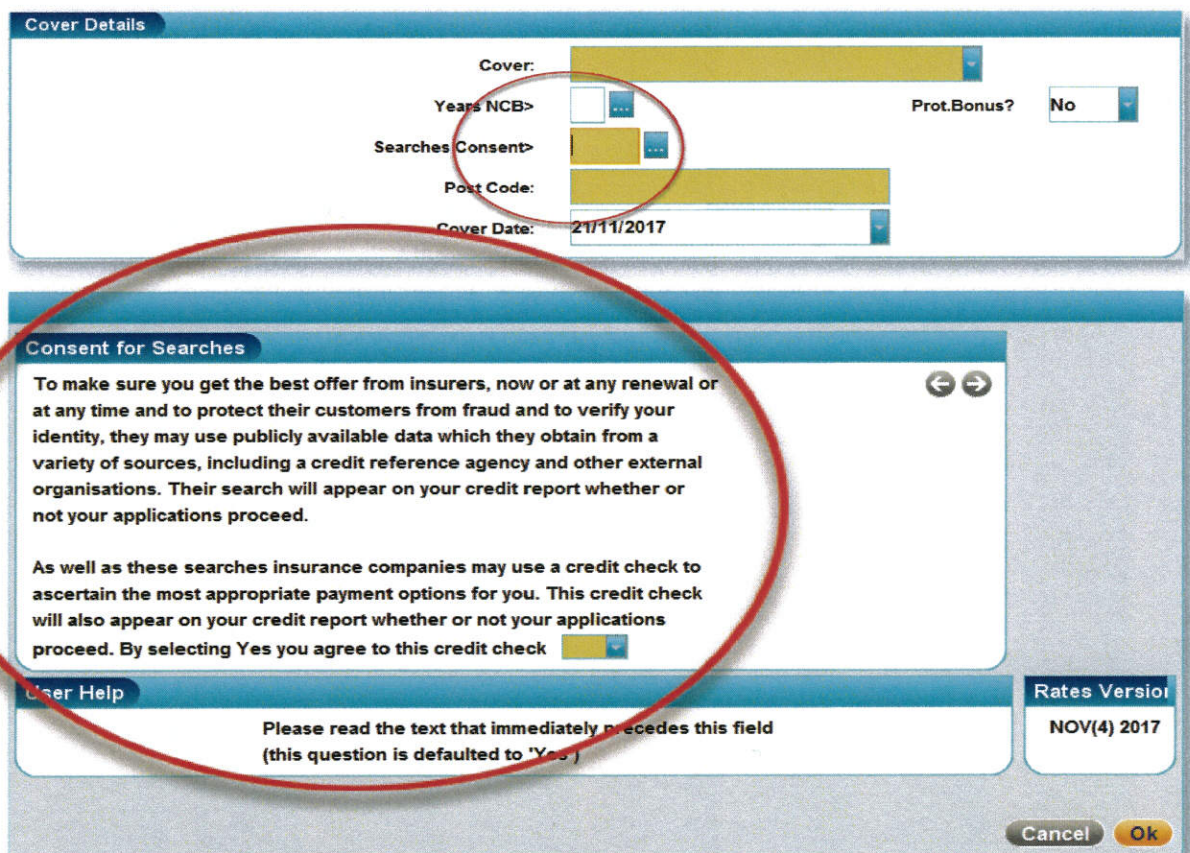


## Current Consent Capabilities

Within the Open GI Core system, consent is currently garnered in various locations using yes/no responses. (It is important to note here that blank is assumed to be a no.). A summary of these various areas within the system are detailed below, including the new consent frame:

## Quote Engines

There are two types of consent that are held within the personal lines quote engines: Searches Consent and Consent for Searches (see screenshots below). The first is designed to take consent from the customer to perform public searches, such as searching on postcode area rating files; the latter is to perform personal searches specific to the risk, such as checks with credit reference agencies.



**Cover Details**

Cover: [Yellow dropdown menu]

Years NCB: [Blue dropdown menu]

Searches Consent: [Yellow dropdown menu]

Post Code: [Yellow dropdown menu]

Cover Date: 21/11/2017 [Blue dropdown menu]

Prot.Bonus? No [Blue dropdown menu]

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**Consent for Searches**

To make sure you get the best offer from insurers, now or at any renewal or at any time and to protect their customers from fraud and to verify your identity, they may use publicly available data which they obtain from a variety of sources, including a credit reference agency and other external organisations. Their search will appear on your credit report whether or not your applications proceed.

As well as these searches insurance companies may use a credit check to ascertain the most appropriate payment options for you. This credit check will also appear on your credit report whether or not your applications proceed. By selecting Yes you agree to this credit check [Yellow dropdown menu]

User Help: Please read the text that immediately precedes this field (this question is defaulted to 'Yes')

Rates Version: NOV(4) 2017

Buttons: Cancel, Ok



## Current Data Protection Capability

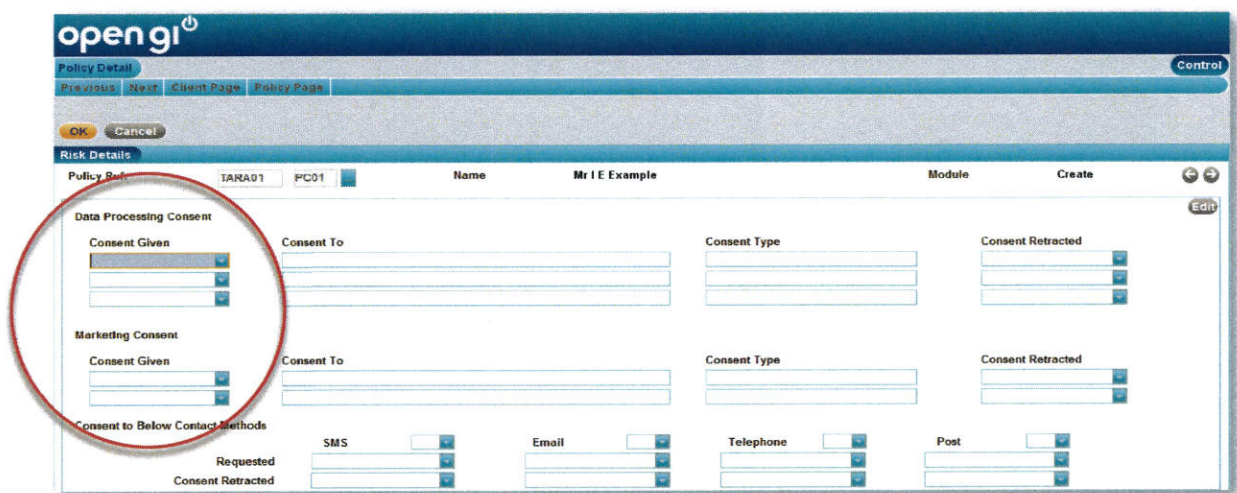
Your current system allows you to control the consent and display for a DPA wording dialogue that can be read out to the customer. It can be configured to trigger at various points in the quote journey. The wording relates to the usage of customer details by the broker and any third-parties.

## SMS Opt Out

This is a field that is available at Client and/or Prospect level that allows the customer to opt out of receiving SMS notification.

## New Consent Frame

We have developed a new Consent Frame, GD, which is available for you to purchase to assist you with your GDPR obligations (see below). This will allow the storage of consent to process data and the consent to receive marketing materials (from the brokerage or a third-party) and by what means (via telephone, SMS etc.). The frame can also store the date the consent was obtained and retracted – if the client decides they would like to withdraw their consent.



The screenshot shows the 'Policy Detail' screen with a 'Risk Details' section. A red circle highlights the 'Data Processing Consent' and 'Marketing Consent' sections. Each section has a 'Consent Given' dropdown menu, a 'Consent To' text field, a 'Consent Type' text field, and a 'Consent Retracted' dropdown menu. Below these are 'Consent to Below Contact Methods' for SMS, Email, Telephone, and Post, each with a 'Requested' and 'Consent Retracted' dropdown menu.

The new frame can be incorporated into your workflow and can either be populated manually, or via XML import for online cases. To add this as a pre-quote frame. Select the [Prospect Control](#) option from the Prospect menu and choose option [number 12 "Pre Quotation Screens"](#). Type Y followed by the [down arrow key](#) to enter the field and input the frame code of GD under 'Screen'. The frame will now appear after the Prospect Details screen has been populated, before the quote or data capture screens display.

(continued on next page)

To utilise GD as a profile frame, as before select Prospect Control from the Prospect menu and navigate to [page 7](#) (using the F11 key to move through the pages). Select [option 83 "Profile Frames"](#) and input the frame code. It will now appear when creating a Prospect profile at Prospect level.

**If you would like more information on this please speak to your Account Manager for further details.**

### **Additional Options**

If you wish to enhance the current consent capabilities of your Core system, it is possible to build a frame (and utilise calculations\*) to house consent and for this frame to be implemented within your workflow. This would allow you full control of the frame content.

**\*Additional software required**

### **Frame Creation**

Frames can be created via the Core Maintenance Menu by selecting the Frame Maintenance/Conversion option.



## The Right to Data Portability

This allows the customer to request their information in a readable format from a previous data controller and move it from one provider to another. There are currently three ways in which information can be extracted from the Core system:

### 1) Database Enquiry

The integrated enquiry tool is available as standard to extract data. This is accessible from Core via the Core Correspondence/Diary/Insurer Accounts menu and will report on 'live' records. In addition, Prospect data can be reviewed from the Prospect menu – see screenshots below and on following pages.



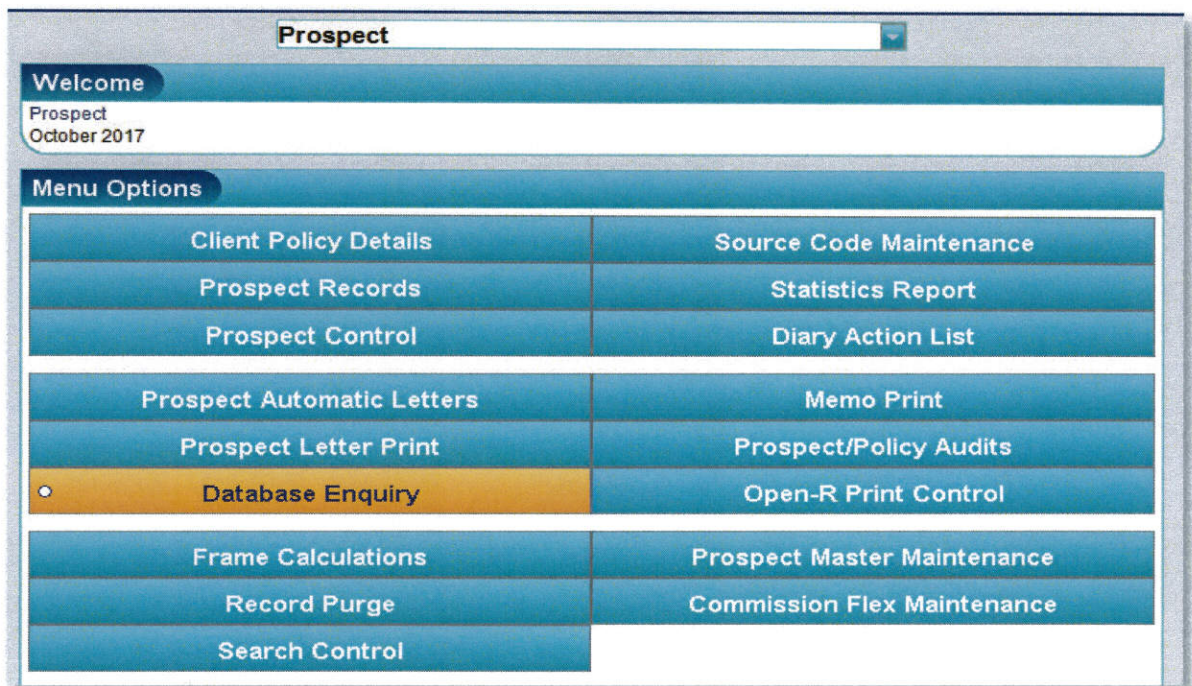
**Core Correspondence / Diary / Insurer Accounts**

Welcome  
Core Correspondence / Diary / Insurer Accounts  
October 2017

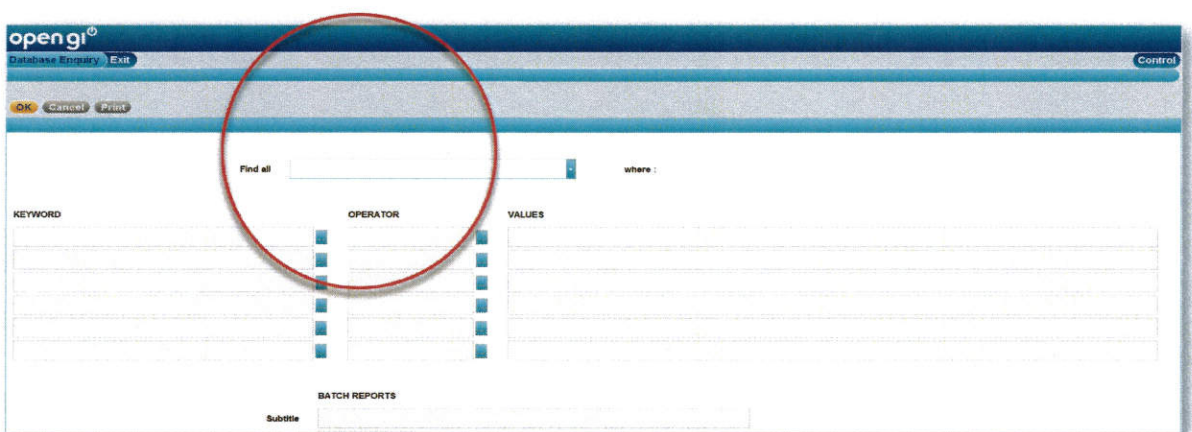
**Menu Options**

Diary Action List	Insurance Creditors List
Cover Notes Expiry List	Policy Analysis
Overdue Papers List	Cashbook Payments Analysis
Letter Generation	Income Analysis
Invoice Generation	Display Analysis Histograms
Client Letter Print	Commission Received List
Insurers Memo Print	Commission Transfer
Composite Invoice Print	Claims Report
<b>Database Enquiry</b>	Insurer Ledger Report
Insurers Reconciliation	Key Performance Indicator
Settlement List	Client/Policy Audits
Settlement Confirmation	Settlement to EOL Insurer





Navigate to Database Enquiry via either menu option and select Administration, followed by Make New Selection and say no to "Load existing selection parameters?". The below screen is now displayed.



From here it is possible to search on Client/Prospect information, policy details, transactional information, claims information and diary entries. This is selected from a drop down pick list in the 'Find All' field. Below this, the keyword can be entered manually or selected from a pick list in the background.



Find all Clients where :

KEYWORD	OPERATOR	VALUES
BCM.Email	Equal to	a@a.com

When all the selection parameters have been entered, the enquiry can then be run. Click the **OK** button from the top of the screen, the system will then begin to search on the criteria entered, click **OK** again when it has finished.

There is an option to save the search criteria so that it does not have to be entered manually in the future, this is completed by saying **yes** to "Save existing selection parameters?".

There are a selection of options presented, most notably in regards to GDPR:

Option	Notes
Examine selection	View the items that have matched the search criteria entered
Generate letters/diary notes/memos/emails	Generate correspondence e.g. Open Word document
Produce report from selection	Produce a report on the items that have matched the search criteria

**Make new selection**

Recall old selection

Parameter maintenance

Examine selection

Generate letters/diary notes/memos/emails

Generate SMS Messages

Produce report from selection

Print labels from selection

Reduce existing selection

Save this selection for future use

Merge two selections

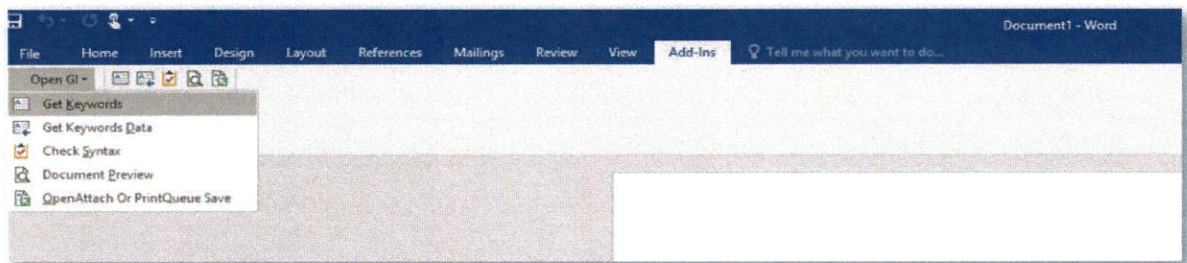
Subtract selection from saved selection



## 2) Letter

It is possible to create a letter template that could populate risk data that would enable the consumer to re-locate their data to another business.

To do this, open up Microsoft Word and click on the Add-Ins button that sits in the banner at the top left of the screen. Then select [Open GI](#) followed by [Get Keywords](#) (as below).



### The Keywords tool will appear.

This can be used to retrieve information from the Core system and populate it into the letter for ease of distribution. Use the 'Search Keywords' drop down list to select a module or Client Master screen and the keywords that sit within that module/Client Master will be displayed underneath. Click [Add](#) to add the keyword into the document.

When the template has been completed, it can be saved to the Open Word templates location (specific to the broker) and utilised when a request for data portability is received.



Select Keyword(s)

Select Keyword(s)

Keywords For Each If Else Calculations Document Variables

Select Category All

Fact Find Form All

Search Keywords BCM Client Master

Enter Keyword

Keywords

- BCM.REFNO
- BCM.STATUS
- BCM.FRAME
- BCM.NAME
- BCM.ADDR1
- BCM.ADDR2
- BCM.ADDR3

Word Options Default Value Formatting

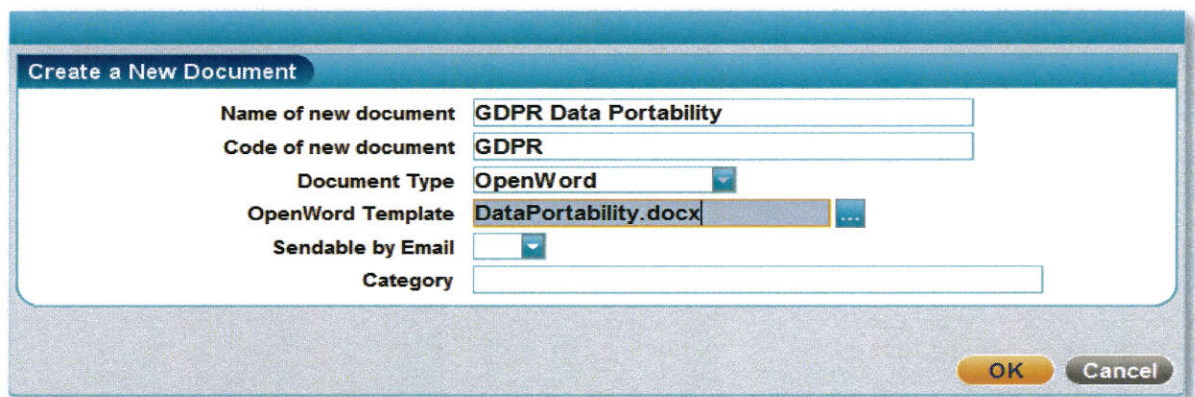
Switch To Word After Inserting Keyword

Add New Line After Keyword

Close Add



To store the template in Document Maintenance (to be used in conjunction with other tools such as Database Enquiry), navigate to the Core Maintenance menu. Select Document Maintenance, read and click [continue](#) to the disclaimer, then [Create a New Document](#). The below screen will be triggered. When completed, click **OK** and the template will then appear in Document Maintenance.



<b>Name of new document</b>	GDPR Data Portability
<b>Code of new document</b>	GDPR
<b>Document Type</b>	OpenWord
<b>OpenWord Template</b>	DataPortability.docx
<b>Sendable by Email</b>	<input checked="" type="checkbox"/>
<b>Category</b>	

### 3) InfoCentre Plus

This is an industry standard tool that provides a database that mirrors the data stored in the Core system database files. It is a real-time reflection of the data stored. The user is able to use third-party programs to create SQL scripts that can search on specified criteria and generate reports.



### Right to be Forgotten

This allows a customer to request their right to be forgotten which means that if a data controller can no longer provide a legitimate reason for storing their data then it must be deleted.

Currently there is a purge facility within the Core system. This is available within both the Core Maintenance menu and the Prospect menu. It is important to note that the record purge will only remove terminated policy files i.e. policies marked cancelled, lapsed, transferred or marked for deletion. It is also important to note that it is recommended that a backup is taken before a purge is commenced to ensure that any records incorrectly removed can be re-instated.

### Record Purge (Core)

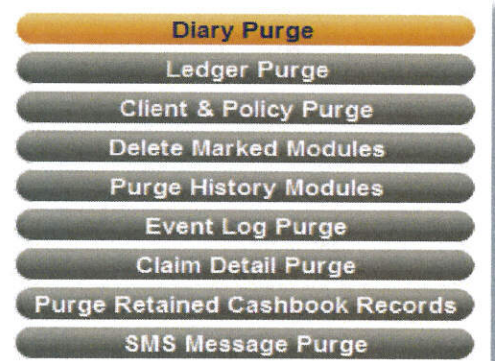
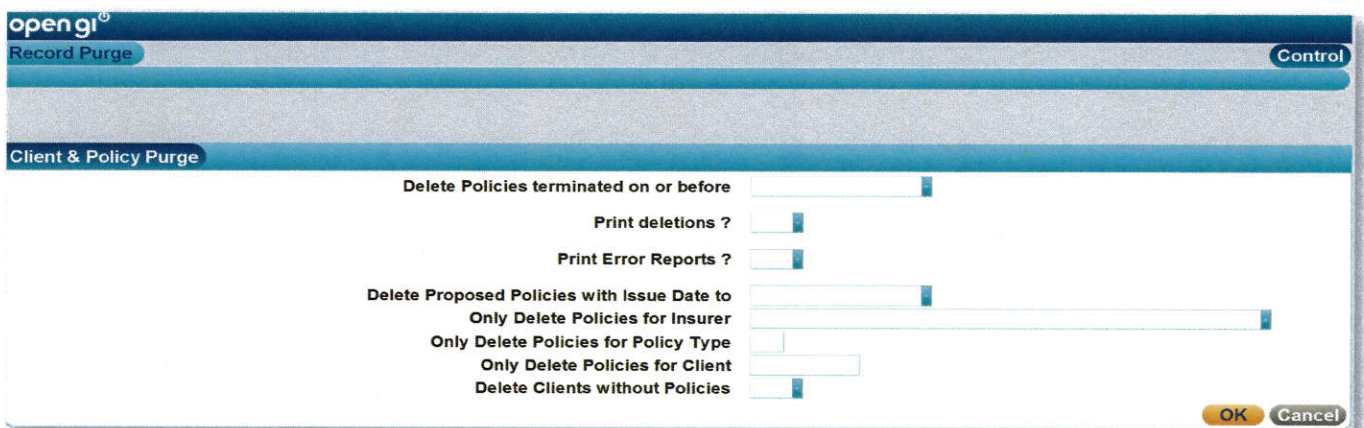
The system will first need to be put into **exclusive mode**. Following this, navigate to the Core Maintenance menu and select **Record Purge**.





There are a number of selection criteria to confirm what is to be purged. The item most relevant to GDPR would be the [Client & Policy Purge](#).

Once selected, the following screen (see below) is presented for completion of purge criteria:

**Record Purge** Control

**Client & Policy Purge**

Delete Policies terminated on or before

Print deletions ?

Print Error Reports ?

Delete Proposed Policies with Issue Date to

Only Delete Policies for Insurer

Only Delete Policies for Policy Type

Only Delete Policies for Client

Delete Clients without Policies

**OK** **Cancel**

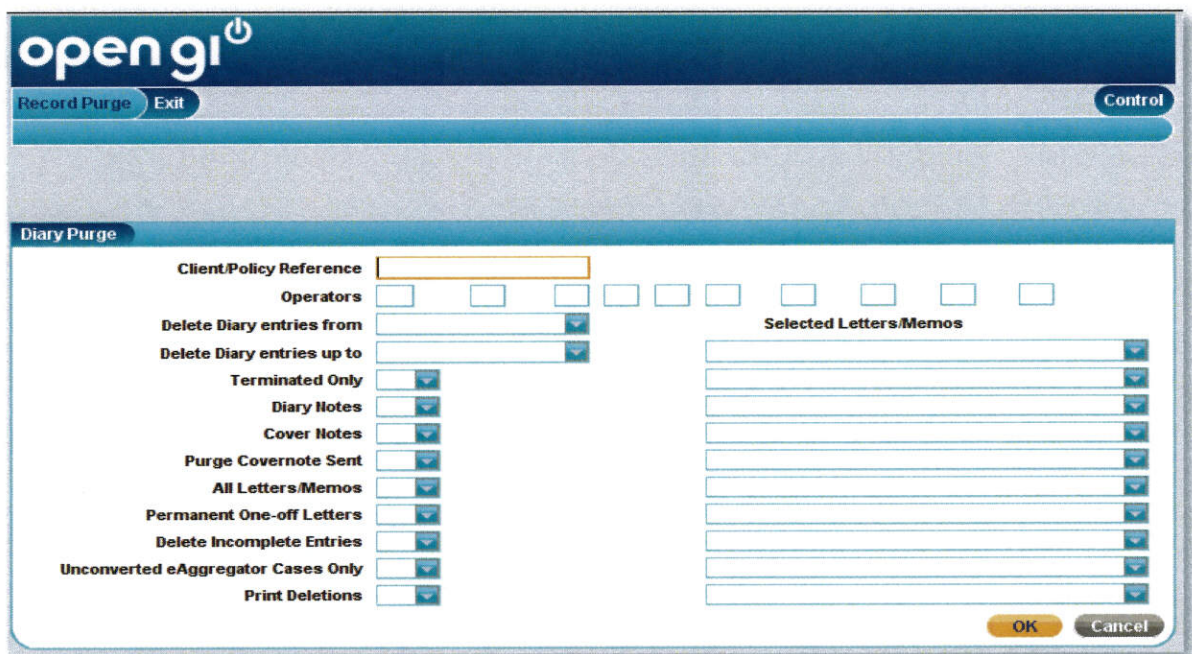
When the above has been populated, click the **OK** button on the bottom right hand of the screen. This will then purge selected items and will print a report. This will document records removed. There are conditions around what can be purged, such as:

- Client records will only be deleted if there are no policies linked to the client.
- Policy records will only be deleted if there are
  - No diary records linked to the policy, and;
  - No transaction records linked to the policy.
- When the policies are being deleted, the policy details linked to that policy must be deleted first.



### Record Purge (Prospect)

As above, exclusive use of the system is required. Navigate to the Prospect menu and select **Record Purge**. The options available to purge are: *Diary*, *Event Log*, *Prospect/Policy* and *SMS*. Again, the most pertinent to GDPR is the *Prospect/Policy Purge*. Populate the options as illustrated in the below screenshot and select the **OK** button on the bottom right hand of the screen when completed.



The screenshot shows the 'Record Purge' window with the following elements:

- Client/Policy Reference:** A text input field.
- Operators:** A row of ten checkboxes.
- Delete Diary entries from:** A dropdown menu.
- Delete Diary entries up to:** A dropdown menu.
- Terminated Only:** A dropdown menu.
- Diary Notes:** A dropdown menu.
- Cover Notes:** A dropdown menu.
- Purge Covernote Sent:** A dropdown menu.
- All Letters/Memos:** A dropdown menu.
- Permanent One-off Letters:** A dropdown menu.
- Delete Incomplete Entries:** A dropdown menu.
- Unconverted eAggregator Cases Only:** A dropdown menu.
- Print Deletions:** A dropdown menu.
- Selected Letters/Memos:** A list of ten items, each with a dropdown arrow.
- Buttons:** 'OK' and 'Cancel' buttons at the bottom right.

For further information on any of these processes, please refer to the Online Guides or contact Support for assistance. Training sessions are also available.