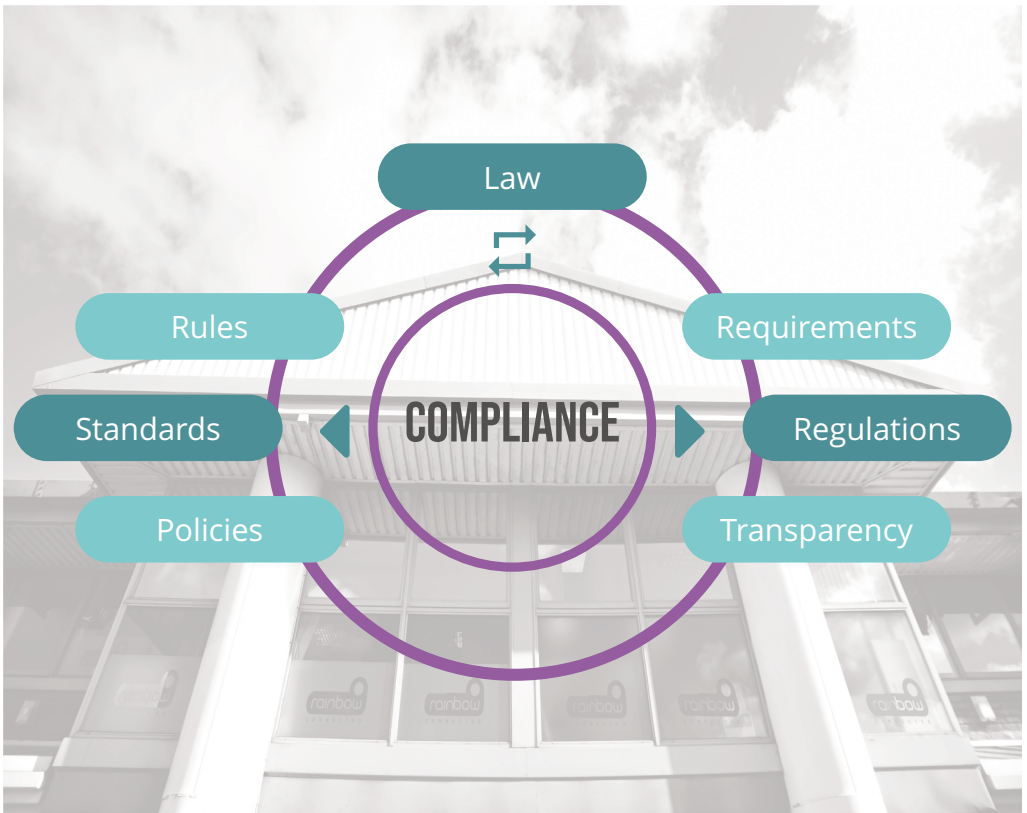


Connecting people  to businesses

# RAINBOW CONNECTED



# “WHY COMPLIANCE IS AT THE HEART OF WHAT WE DO”



## A few words from our Head of Compliance, Matt Newton

In an ever changing modern world, one thing that remains constant is the need to follow rules. With many new regulations that have come about in the past few years, Rainbow understands Compliance is one of the most important parts of our business.

Quite simply, without Compliance, we do not have a business.

At Rainbow we believe we strike a perfect balance.

We have an outstanding sales team, dedicated to helping us grow through innovation, launching new products and campaigns, and providing top notch services for our existing clients. Working directly alongside this is a tireless work ethic, ensuring we remain compliant with all rules and regulations at all times.

We also understand that Compliance does not just sit with one person, or one team. It is incumbent on each and every one of us to be

diligent in our roles. This leads to small wins, like building trust and cohesion within an office environment, but also bigger wins, such as greater output from our teams and increased efficiencies, leading to higher productivity in the company and building a positive reputation with our many clients.

For many (or most), compliance will never be 'fun', however the range of benefits from making it the cornerstone of our organisational culture makes it possible for our business to be stronger, more resilient, and easily adaptable to change.

# GDPR



At Rainbow Connected we have made a business decision to only use data for the purpose it was originally intended, where the data subject has applied for an insurance quotation or specific financial product, or where the data subject is an existing customer and fall under our renewal service.

A judgement was made at the start of the company to steer away from telephone or marketing lists as we do not wish to interrupt data subjects lives for products or services they may not even be aware they opted in for.

We feel by doing this, we are able to remain at the top of the lead quality tree, delivering only the best and most relevant leads to our clients.

When performing Lead Efficiency Product

(LEP) campaigns for our clients, we request due diligence on the data being supplied, to ensure that Rainbow Connected is lawfully processing and contacting the data subjects for the correct purpose.

Rainbow Connected's proprietary software, built in house, is a bespoke CRM system we call Click2Call (C2C). Our system enables us to record and report on all our data sources and call campaigns in one place. With the added benefit of integrating our VoIP telephone system, it is simple to view any call recordings linked to each individual lead.

Because we have developed the system from scratch, in house, we are able to improve any aspect and implement updates as soon as they are required, with GDPR at the forefront of our continued development.

## RIGHT TO BE INFORMED RIGHT TO ERASURE

Full Transparency is our goal, all data subjects have full rights under GDPR, and Rainbow Connected has procedures in place to fulfil any data requests promptly.

Our system allows us to trace a leads origin and report back any linked leads allowing for full disclosure. We can easily pause the processing of any lead upon request, as well as erasure or alternatively, in cases where we are required to maintain the statistical data, anonymization will be implemented.

Rainbow Connected pre-qualify leads before transferring them through for a quote, this not only allows us to validate the ID of the

## RIGHT OF ACCESS RIGHT TO RESTRICT PROCESSING RIGHT TO DATA PORTABILITY

person we are speaking to, but also enables us to check the data is correct and up to date, and allowing the data subject to rectify any incorrect information accordingly.

Based on completion of our Legitimate Interest Assessment we have concluded that we process personal information using the lawful basis of Legitimate Interests.

We have decided on this basis as it allows us to meet with the ICO and FCA rules and is the most suitable lawful basis for processing data with a view to arranging a financial services quotation for our customers.

## RIGHT TO RECTIFICATION RIGHT TO OBJECT

## **STORAGE LIMITATION**

we only hold data for as long as is necessary to perform our services, or as long as required by law

**LAWFULNESS  
FAIRNESS  
TRANSPARENCY**

## **PURPOSE LIMITATION**

we only use data for the purpose it was originally intended

**ACCOUNTABILITY**

**ACCURACY**

**DATA  
MINIMISATION**

**INTEGRITY  
CONFIDENTIALITY**

# DUE DILIGENCE

As standard company procedure and following GDPR requirements, whenever Rainbow Connected embark on a new campaign due diligence is par of the course.

Whether it is purchasing data, selling data or processing data on behalf of our clients, we do our research to make sure that everyone in the chain has the correct permissions.

Due diligence forms are sent out in conjunction with our terms of business agreements and completion of both is a prerequisite for all our campaigns.

As well as data, we also run checks on the companies we work with, their owners and directors, as well as our own staff.

Our due diligence files are reviewed and updated on a regular basis, to ensure compliance.



Discuss campaign requirements with your dedicated account manager



Terms of business agreements and due diligence forms sent out for completion and signing



Information provided is checked and verified by the compliance team



Campaign can now start



# DATA SECURITY

## SECURITY

At Rainbow, we have built our own suite of tailor-made applications and telephony tools to enable our agents to receive, process and filter leads. This enables our dedicated contact team to contact leads in the shortest possible time and be able to transfer those calls, in a secure and fully compliant manner. We also have our own team of full-time developers; constantly updating and improving our current systems, as well as building new, leading edge technologies for the future.

Our servers are hosted in our on-site, fully virtualised server farm, providing the very latest in speed, security, backups and resilience with the ability to upgrade quickly and cleanly. Our data is stored in replicated SQL servers and backed up securely to our own off-site backup facility. We have our own dedicated team of IT professionals to support and manage the servers and infrastructure.

All data is transmitted over secure, encrypted channels. Facilities are managed by Rainbow Connected's internal IT support team. By using our own facilities and support staff, we can vet all staff coming into contact with the data. As an additional security measure the use of hand-held devices within the call centre are controlled and our wireless network is protected by WPA2 encryption and the pass phrase regularly changed to minimise the risk of unauthorised access.

Our network is protected by the latest in secure, managed firewall technology. (We will shortly be upgrading the firewall when we upgrade the phone system)

**Note:** As we are continuously improving and constantly updating our systems, this information was correct at time of writing (March 2019)

## BUSINESS CONTINUITY

No-one likes to think of a doomsday scenario, or a catastrophic event. However in this modern world, you have to be prepared for any eventuality. Here at Rainbow Connected, we are certainly prepared. We know that a disaster can be anything that puts our operations at risk, from a cyber-attack, to equipment failures, to natural disasters.

You'll read elsewhere in this brochure about the steps we take to mitigate these risks. Occasionally however, a disaster is unavoidable. That's why we have a disaster recovery plan in place that details actions to take and processes to follow in order to resume critical functions quickly, away from the affected office/area, in order to continually ensure we deliver the exceptionally high standards we expect of ourselves, and that we provide you, our clients.



## MEET THE TEAM

In this brochure, we have taken you through the processes, procedures and controls we adhere to here at Rainbow. This is to ensure we remain protected as a Business, at all times. We impress on each and everyone in the business just how important Compliance is, how we all take collective responsibility, and we keep it at the heart of everything we do.

However, we do also have a dedicated Compliance Team who work across all areas of the business. Have a read about them below.

### MATTHEW NEWTON

Joining Rainbow in 2018 as Head of Compliance, Matt has detailed experience in Insurance, having spent 8 years with Aviva. Matt brings with him a wealth of Compliance knowledge, gained from both the Insurance and Welfare to Work sector, and has a strong focus on customers, risk and governance.

Matt's key skills are a passion for detail, and integrity, both absolutely vital in any Compliance role, and ensures the business activities of the organisation are always carried out within a regulatory framework.

He also knows how to manage conflict and handle dissension, especially when encountering circumstances requiring them to explain and defend a particular point of view. Therefore confidence and resilience when faced against tough situations and dealing with external agencies such as regulators are a must-have.

### KATIE HUDSON

Katie has been involved with Rainbow Connected since 2010, working with campaign statistics, accounts and administration. In 2018 Katie transitioned into a Compliance role, bringing valuable company knowledge with her. Katie has worked closely with clients making sure all elements of their campaigns are kept running smoothly.

Katie's 8 years in Insurance means she is adequately placed to understand the needs of all our clients commercially and compliantly.

# www.rainbowconnected.com



RainbowConnects



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