

Otium

Sports Clubs and GDPR

Next steps to ensure compliancy

[Page 4](#)

Equine liability

Liability for damage caused by animals

[Page 8](#)

Going on tour

Top tips for taking a sports team on tour

[Page 12](#)





Welcome to Otium

The Sport, Recreation and Equine team at Howden are a dedicated and experienced team of insurance specialists, managing the risks for National Governing Bodies, voluntary sports clubs, coaches, participants and organisers. We insure hundreds of sport and recreation associations and over 3 million individuals.

Our equine team are not only insurance experts but equine enthusiasts through and through. This means that they speak your language as well as being able to negotiate strongly with underwriters on your behalf.

Our team has many years' experience designing products for the sector and has a keen interest in all aspects of sport and recreation. As well as advising on every type of insurance cover available for our clients, the team can create bespoke products if required.

GDPR and you

How the new data rules affect clubs,
instructors, businesses and NGB

As of 25 May 2018, the use of the majority of personal data in the UK will be governed by the General Data Protection Regulation ("GDPR"). This will replace the Data Protection Act 1998 ("DPA") with a view to providing an up to date, comprehensive and coherent data protection regime. It brings data protection to the top of the agenda.

It is virtually impossible to run any organisation, let alone a sports club, without collecting and storing the personal data of members. However, the growing trend right across the world is for individuals to demand – and be granted – more control over the information stored about them. That is a challenge for many clubs who

simply store mailing lists and the personal details of members on home computers, totally reliant on whatever default security Windows may offer to keep them safe.

If you have not already considered your obligations, then now is the time to do so. The “next steps” section at the end of this article sets out what you should be doing now.

How will the GDPR work in practice?

At a very basic level the GDPR requires anything that is done (“processing”) with any information relating to an identifiable individual (“personal data”) to be handled in accordance with a number of data protection principles. There are additional requirements in relation to “special category personal data”, which includes information such as racial or ethnic origin, data concerning health, sex life and sexual orientation. Sports clubs will be “data controllers” in relation to most of the personal data they handle relating to members, volunteers, attendees, staff, and any other identifiable individuals, and are therefore required to comply with the GDPR.

The data protection principles require personal data to be:

1. Processed fairly, lawfully and in a transparent manner;
2. Processed for specified, explicit and legitimate purposes, and not further processed in a manner incompatible with the purposes for which it was obtained;
3. Adequate, relevant and limited to what is necessary for the purpose;
4. Accurate and kept up to date;
5. Kept in a form which permits identification of data subjects for no longer than is necessary; and
6. In a manner that ensures appropriate security.

There is also a requirement not only to comply with the principles but also to be able to demonstrate such compliance. The best way to do this is through proper policies and procedures, and communicating privacy notices to individuals.

Lawful Basis for Processing

If an organisation is doing anything at all with personal data, from obtaining it, to holding it, through to deleting it, it should assume that it is processing personal data. A key part of compliance with the GDPR is establishing the lawful basis for processing of that data. For “personal data” one of the bases in Article 6 GDPR has to apply. In relation to sports clubs these will most likely be:

- Consent – that the individual has given their consent to the processing. There are specific requirements that must be met for consent to be valid, all of which must be met.
- Legitimate interest – that the club has a legitimate interest in processing that information for the particular purpose, which is not overridden by any prejudice to the individual.

For “special category personal data”, such as details of any medical conditions, racial or ethnic data, one of the bases in Article 9 GDPR has to apply. For sports clubs this will most likely require the individual’s consent.

Data Security

Appropriate technical and organisational measures must be in place in relation to the processing of any personal data. Clubs must give careful consideration to how any personal data is held by the club and who has access to it. Access should be limited to those for whom it is necessary to do so for the specific purpose. If the information is held in hard copy then where this is held and how should be carefully considered to restrict access and limit the potential for loss of information.

Next steps

All sports clubs should take the following steps to ensure compliance with the GDPR:

- Make a list of all types of personal data and special category personal data processed by the club;

- In relation to each category, list every reason for processing that type of personal data;
- In relation to every reason listed, decide what the lawful basis for processing the personal data for that reason is;
- If consent is required then to make sure that any consent is compliant with the requirements of the GDPR – including providing as much information as possible in relation to why the information is required and for what purpose, how it will be held and kept secure, who has access to it, when it will be deleted, and the right to withdraw consent at any time;
- Determine whether the information held is only that which is required as an absolute minimum for the purpose for which it is processed, and if there is any information which is not necessary then to ensure that this is securely deleted;
- Consider how information is held, whether this is secure, and the potential for a breach – particularly in relation to any special category personal data – including establishing exactly how all staff, officials and volunteers use and store any personal data;
- Consider how long any information is required to be held, and ensure that procedures are in place so that it is securely deleted when it is no longer required;
- Consider whether the club has any policies on data protection, and if not then to draft these to ensure that all staff, officials and volunteers are aware of their obligations and the requirements of the club;
- To provide privacy notices to all staff, officials, volunteers, members and attendees of the club using the information above, and to communicate these to all current and any future staff, officials, volunteers, members or attendees in an appropriate way, setting out:
 - The identity and contact details of the club as a data controller;
 - The purposes for processing any personal data and the lawful basis relied upon, including any legitimate interest pursued;
 - The recipients of the personal data, if any, such as third party contractors;
 - The period for which the personal data will be stored;
 - The right to withdraw any consent at any time;
 - The right to complaint to the Information Commissioner’s Office; and
 - The following rights of the individual:
 - To have any inaccurate information corrected;
 - To have access to any information held about them;
 - To object to the use of their information; and
 - To require their information to be erased.
- Review any contracts with third parties to ensure they comply with the GDPR, if they involve the sharing of personal data. There are now specific requirements set out in the GDPR in relation to personal data processed on behalf of data controllers by other organisations.

Conclusion

Sport clubs who have not yet considered their data protection obligations undoubtedly have work to do to in order to meet the enhanced requirements of the GDPR. However if a sensible and structured approach is taken, and a proper plan put in place as to how to meet the requirements, such clubs should be in a good position going forwards. Data protection is an ongoing requirement and data policies and procedures should be regularly reviewed to ensure they are being followed and are fit for purpose.

If you would like to discuss the requirements of the GDPR in greater detail or to seek our advice, please contact Dmitrije Sirovica of Browne Jacobson LLP.



DMITRIJE SIROVICA

E: dmitrije.sirovica@brownejacobson.com
T: 0115 9766238

Animal acts

Liability for damage caused by animals



Every year, about 25 people are killed by animals in the United Kingdom. Horses and cows are responsible for the most deaths: about 10 and 5 respectively; dogs cause about 4 deaths whilst bees and wasps are responsible for a further 3 deaths every year. The number injured is far higher: over 7,000 people per year are admitted to hospital following dog bites, whilst the BHS have estimated that there are over 3,000 horse related accidents on the roads alone. It is unsurprising that many of these incidents result in litigation.

The law relating to civil liability for damage caused by animals is set out in the Animals Act 1971. This Act has always received a bad press. When it was a Bill passing through parliament it was alleged to be 'divorced from reality'; it was dismissed as 'that Mongrel bill' and was said to 'bristle with practical difficulties'. Since passing into law, the judiciary have been little kinder. Lord Denning suggested that the Act was 'cumbrously worded' while more recently Lord Justice Jackson referred to its provisions as 'grotesque'.

Some of this criticism is unfair. The basic principle that underpins the Act is that the keeper of an animal is strictly liable for damage caused by that animal if the keeper knew that the animal might be dangerous in the circumstances, either because the animal belonged to a dangerous species not domesticated in the UK, or because the animal had an abnormal propensity to behave in a dangerous way, or because it was normal for animals of that species to behave in a dangerous manner in those particular circumstances. It is not a fault based liability.

The Act essentially means that liability for damage caused by animals has is not been based on fault and negligence, but on the keeper's knowledge of the dangerous characteristics of his animals. There is nothing intrinsically unfair about such provisions. It simply means that the risk associated with damage caused by animals often lies with the faultless owner of the animal rather than the faultless victim of the animal.

How then are claims under the Animals Act successfully defended? In recent years the Courts have been keen to stress that there will be no liability under the Act if a claimant has voluntarily accepted the risk of an injury. To voluntarily accept the risk of an injury one must fully appreciate the nature of the risk and expose oneself to it.

In cases involving horses, it will, therefore, frequently be a defence to establish that the claimant was fully aware of the risks when he or she agreed to ride the horse. This defence has certainly resulted in a significant reduction in successful claims in the last few years. Consequently, owners of horses need to be careful to ensure that anyone who rides their horses is fully aware of the risks. If a horse has been involved in incidents in the past the owner might well need to have told a rider about them before that rider could be said to have been fully aware of the risks.

In other cases, prevention will be the best form of defence. The HSE regularly investigates incidents involving cattle and members of the public. It points out that the two most common facts in these incidents are cows with calves and walkers with dogs. It provides information sheets setting out advice for farmers, landowners and livestock keepers which should be consulted by any who own livestock. Its first suggestion is that wherever possible cattle should be kept in fields that do not have public access, especially when cattle are calving or have calves at foot. This is sensible advice, even if it cannot always be followed.

There have been attempts to reform the Animals Act. None have succeeded. There are those that say it should simply be replaced by the law of negligence, and that only if fault is established should an owner of an animal be liable. There are others who say that liability should be entirely strict, and that an owner should always be liable for damage caused by his or her animal. The Animals Act probably presents a reasonable compromise to these two extremes.



ROGER HARRIS is a barrister at 2 Temple Gardens who specialises in equestrian and farming related law.

Insurance for animals

Do you have the cover you need?

There are many different types of insurance policies which may include cover for animals as standard. For example, if you have a domestic dog, you may have cover under your home insurance policy for any compensation you have to pay if your dog injures a third party or causes damage.

If you keep animals such as horses, sheep or even bees; it is likely you will require a more bespoke policy. An equine policy could provide cover for loss of your horse due to accident, injury or disease, also for veterinary fees and third party liability cover. As a beekeeper you can obtain cover against disease and also to protect against your bees causing damage to others and/or their property.

Businesses also need to consider if they require insurance for animals. If you have employees who work with animals, you will need to make sure that your insurers are aware of this, so you have the right cover in place. A full disclosure of facts around the business and any activities involving animals will be required. Some of the information insurers will need from you is the type of animals, how many you have, where they are kept and who cares for them.

If a business is responsible for looking after animals that are owned by someone else, for example a livery yard or boarding kennel, the owner may want to consider additional cover for loss of an animal in their care due to their negligence. Most policies will exclude damage to property in the care, custody and control of the Insured but there are extensions available on some insurance policies to include this cover in respect of animals.

A farmer may want cover for livestock to protect against risks such as mortality, infertility, theft and disease. Standard farm policies often include exclusions relating to such risks and therefore the policy wording should be checked carefully. Owners of livestock – in particular horses and cows - will undoubtedly require public liability insurance, as if any of their livestock escaped, the owner may be liable for any injury or damage caused.

The key to ensuring you have appropriate cover in place – for your individual needs – is to speak to your insurance broker and provide them with as much information as possible. They will then be able to advise and assist you in obtaining the cover which you need.



CATHERINE MORGAN
Associate Director, Equine



Away games



ANDY FIELDING
Associate Director, Sport & Recreation

Top tips for taking a sports team on tour

Whatever the season, if your club or association is thinking of taking your team on tour, expert risk advice can help to alleviate some of the concerns all organisers face.

A trip away can be the highlight of the year, bringing players and coaches closer together and creating a club atmosphere that improves performance on the pitch, too.

However, the long list of things to consider before leaving can be overwhelming, not least in ensuring the right insurance policies are in place for all eventualities.

Here is a quick guide to the key things to consider before taking a team away:

The essentials

- For youth groups ensure that your club has a safeguarding children policy, policies and procedures for selecting and recruiting volunteers, an active Welfare Officer on the trip and procedures for reporting concerns about the welfare of a child.
- All players under 18 will need a signed consent form, kept safely in line with data protection legislation, before they can travel.
- A qualified first aider should be included on the trip.
- Ensure you have the following insurance in place: public and civil liability, personal accident and vehicle breakdown cover. Professional indemnity insurance can protect coaches and trainers too. Don't forget that employers liability insurance is just as essential for volunteers as for paid staff.
- On trips away, club members may take part in activities outside their normal sport – for instance swimming. Every child will need specific written consent for each activity – and check your insurance covers those activities.
- For trips abroad, travel insurance is vital to cover any emergency medical costs. You must ensure this covers injuries that occur whilst taking part in your sport, including whilst competing.
- Don't forget European Health Insurance cards.



Preparation

- Appoint a tour committee to organise the trip – this can be far more effective than relying on one person to do everything.
- Have a brainstorm to decide on destination, date and budget.
- Raise funds towards the trip to make it more affordable – race nights, quiz nights, raffles and sponsored events are all good. Check out easyfunding.org.uk, a free online fundraising service which can help too. Remember any events on club premises need to be covered by public liability insurance to cover against anyone being injured as a result of an accident on club property.
- Try setting up a '400 Club'. This involves every player finding as many people willing to part with £1 a month for the period of the fund raising. When the figure reaches at least 400, each person is allocated a number and a draw made to provide prizes – 50 per cent goes to the draw, 50 per cent towards the tour.
- Set up a reliable system for tour members to pay. The 'Teamer' app can be useful to help organise group communication and shared payments – <https://teamer.net/>. The app Splittr app can be useful for adult groups wanting to share expenses while away – <http://www.splittr.io/>

On the trip

- Remember for youth groups (for children over eight years old) there should always be two adults on the trip – and a minimum of 1 adult to 16 children. More adults are required for younger groups and your Governing Body will be able to advise appropriate ratios.
- When taking a male group there should always be a male member of staff – and female groups require female staff too.
- Ensure anyone driving on the trip has a valid licence, MOT, tax and insurance, especially if using their own vehicle.
- Identify who will be the Welfare Officer for the trip and make everyone aware.
- Give everyone an information pack. This should include: dates, what you are doing, where you are going, rules, kit list, medical care needs, club rules.
- Make sure you have the best possible and most cost-effective insurance before you travel by dealing with a reliable broker.

The expert team at Howden are available to discuss your team's travel insurance needs, and can help to ensure that the risks from your specific activity are comprehensively covered. Amongst the benefits of using an expert broker is the ability to select the best schemes from the most appropriate insurers, creating a bespoke policy where necessary.

Good corporate behaviour

Surviving and thriving online



Why Tweeting for a club or organisation requires a strong social media policy

Social media has become such an important part of everyday life that the idea of running a club or association without a Twitter feed or a Facebook page is almost unthinkable.

It is the way people talk to each in 2017 and comes with an added bonus that it reaches a wide audience almost instantly.

Consequently, when it comes to finding a volunteer or club official to take charge of social media, it is not often a problem. Most clubs are filled with ready-made enthusiastic experts keen to take on the role.

However, the flipside is that social media still comes with a range of serious challenges.

Mishandled Twitter accounts, inappropriate posts and poorly-handled responses can have a huge impact on an organisation's reputation and even lead to litigation.

The number one rule for corporate social media is to have a well thought-out social media policy in place. This should outline the tone expected, explain the organisation's key messages, describe the kind of comments to avoid, show how to deal with complaints or abuse – and provide a complete run down of rules to be adhered to.

Points to make social media managers aware of include:

- The Twitter feed for a club or organisation is its window to the world and plays a large part in determining its reputation. It is not to be treated as a personal account.
- Tweets need to have personality and a touch of humour – no-one wants a boring feed which sounds corporate and rigid. But there is a line not to cross and it takes skill and experience not to over-step it. Guidance is required.
- Twitter is not just for talking to your friends and teammates. Posts can be seen by anyone – so the kind of dressing room banter which may be acceptable in the clubhouse can be easily misinterpreted online. Save it for IM or offline messaging.
- Despite a commonly-held belief that Twitter is in some way above the law, it isn't. A club or organisation may be held legally responsible for user comments on its site which insult or libel someone. A system which monitors all new posts before they go live may be appropriate.
- Safeguarding issues apply just as much online as in 'real life'. Posting images of children without the permission of parents or putting people at risk with the information posted is a serious matter.
- Social media works best when it is updated regularly but the temptation to schedule automated posts is a dangerous one. Who wants a gregarious jokey Tweet popping up just when everyone is discussing something horrible or unpleasant which happened that morning?

Given that a club's reputation may lie in the hands of social media, it is wise to keep track of all conversations that are going on about your organisation. Choose a selection of keywords to keep an eye on, such as the club's name; website address; services provided; names of key board members and common expressions.

Free social media monitoring tools such as Google Alerts, Hootsuite, MonitorThis and SocialMention can be useful.

But what happens when the haters arrive? This is becoming a bigger and bigger problem on social media and, together with online bullying, can be incredibly difficult to combat.



ANDY GOULBOURNE
Divisional Director,
Sport Recreation and Equine



Some key considerations:

- Remember messages are not one-way – and the responses you receive are not controllable. So have a plan to deal with them – and monitor them regularly.
- Always respond in a professional and positive way to complaints and address the issues raised. Avoid the temptation to get involved in a slagging match and don't get angry.
- If you feel a response has overstepped the mark, say so and end the conversation. Report it if necessary and block the sender.
- Take heated conversations, those which are not abusive and require a response, offline as often as possible. Taking it out of the public domain can limit damage and also calm the situation.
- Don't let an online crisis or argument take over your account. Keep posting positive things to redress the balance.
- If you spot online bullying, especially when a child is involved, don't be afraid to report it. If it includes threats of violence, child pornography or sexually explicit messages - or pictures of someone in a place where he or she would expect privacy - then it is appropriate to inform police. Cyberbullying as well as stalking and hate crimes are taken seriously.
- Make sure you have the right insurance in place. Cyber Liability, civil liability and directors' and officers' insurance could all be appropriate.

Discrimination

What is it and how can you avoid a claim?

Promoting equality in sport remains a key issue for local, national and international sporting bodies alike. Gender discrimination has long been a controversial topic, whether in respect of participation, prize monies or media coverage. In recent months, history has been made in the 2018 Winter Olympics with a greater acceptance of athletes who are openly LGBT. Both participation in and coverage of sport for people with disabilities has continued to grow over recent years.





LEAH JONES
Browne Jacobson LLP

The push to remove barriers to participation, promote equality and reduce discrimination in the sporting world is set to continue. Complete equality may take some time to achieve but at present it is important for all organisations, whatever their size, to understand and apply the legal framework around equality and discrimination. This will help to promote best practice and avoid claims.

What is the law?

The key legislation for discrimination is the *Equality Act 2010*. At its core the Act seeks to ensure that an individual is not treated unfairly on the basis of who they are.

The Act applies to employers, prospective employers and individuals. It similarly applies to any business that provides goods, facilities or services to members of the public. It will therefore apply to any sports club, gym or sporting venue. Equality law will also apply to any club that under the law is an “association”. This is any club or group which has more than 25 members and has rules to control how someone becomes a member (e.g. where you must be nominated to join).

If any of the above fails in its obligations under the Act, an individual may bring a claim for discrimination.

What is Discrimination?

Under the Equality Act, there are nine protected characteristics. These are:

- Age
- Pregnancy and Maternity
- Disability
- Gender reassignment
- Sex
- Religion or belief
- Race
- Sexual orientation, and
- Marriage or civil partnership.

Whilst most of us will have an idea about what constitutes discrimination, the answer to this question is not as simple as it might seem. Some of the most common forms of discrimination are:

Direct Discrimination

This means that an individual is treated differently or put at a disadvantage due to their protected characteristic. It can include those treated differently due to a perception of a protected characteristic or an association with another person with that characteristic (e.g. refusing membership of a club due to disability). Discrimination of this nature can never be justified.

Indirect Discrimination (except where objectively justifiable)

Someone is indirectly discriminated against if a way of working, policy or procedure that applies to everyone equally puts them at a disadvantage due to their protected characteristic (e.g. a no dogs policy preventing a blind person accessing your club premises).

If a policy that is considered indirectly discriminatory can be explained as a *proportionate means of achieving a legitimate aim*, it can be justified and will not be considered to be discriminatory (e.g. if someone is unable to wear necessary safety equipment due to a protected characteristic).

Harassment

Harassment relates to unwanted behaviour from others relating to a protected characteristic. In cases of harassment, the person who is discriminated against may bring a claim against both the individual perpetrator and their employer.

Victimisation

Where a person has previously complained of discrimination and is later placed at a disadvantage or treated differently due to this.

Failure to make reasonable adjustments

There is a positive responsibility on service providers and associations to accommodate people with a *disability* by making reasonable adjustments e.g. ensuring that you have a ramp to facilitate access to premises.

Exceptions

An *association* may restrict its membership to people who share a protected characteristic (e.g. a men-only club or society for people of a particular disability). It is important to note that this exception does not apply to *service providers* other than where it is objectively justified (e.g. offering female only swimming sessions).

There are also exceptions when it comes to sports specifically. Under s195 of the Act, in certain circumstances e.g. where it is necessary for fair competition or safety, discrimination on grounds of sex, gender reassignment and/or age may be permitted.

This means that it is not considered discriminatory to separate men and women or people of different ages in competition. It is important to note that transsexual people should be treated as belonging to the sex in which they present unless there is evidence it will cause an unfair disadvantage.

In addition, the law allows for selection on the basis of nationality, region or place of birth in competitions where the competitor or team is representing that nationality or region.



What does this mean for you?

Improving participation and ensuring equality are not contentious aims and many clubs and societies will already have plans and policies in place to help them to avoid discrimination. Whether or not this is the case, there are some simple, practical steps that can be taken to help avoid the risks of a claim or deal with it effectively if and when faced with one.

Organisations should ensure that an *effective equal opportunities* policy is in place that volunteers and employees alike are familiar with. It may also be necessary to review policies, giving thought to whether any of them disproportionately impact on those with protected characteristics.

It is also important to provide *training* to staff and volunteers so that they understand the principles of equality, are able to recognise instances of discrimination and respond appropriately to allegations.

Equality means treating people fairly, not identically. If it is possible to make *reasonable adjustments* to accommodate individual need, efforts should be made to do so. A common-sense approach to considering what is reasonable should be taken, taking into account the nature of the club or business and the costs of adjustments.

If someone reports discrimination, it needs to be taken seriously. Organisations should ensure that any allegation is dealt with objectively and that an open dialogue is maintained. It would be sensible to notify your insurers at an early stage and consider seeking legal advice sooner rather than later to help you manage the risk.

Cyber-crime

PREPARE, PREVENT, PROTECT

As technology becomes increasingly important for businesses of all shapes and sizes, the need for robust insurance protection against the threat of cyber-crime also increases.

Cyber crime cost UK businesses £29 billion in 2016* and research conducted by OnePoll suggests 60% of UK office workers receive a phishing email every day. So, what can the sport and recreation sector do to protect itself?

Sporting and membership organisations handle considerable amounts of customer data, containing sensitive personal information, making them a

potential target for cyber criminals. That's why data security should be a fundamental consideration for any organisation, no matter how small.

Weak security systems could enable cyber hackers to compromise your organisation by stealing valuable data such as financial information (card and bank account details), or access your customer database and sell it to a third party.

Take precautions

To defend your organisation adequately it is essential to adopt a culture of awareness of cyber risks. The OnePoll research suggests that the 60% of workers referred to above will fall for a phishing fraud unless trained to spot them. Some 27% of them had no idea what phishing was, while one in five admitted they had fallen victim by clicking on a link or attachment. It can be that simple to fall into the trap!

No two organisations are ever the same, and an insurance broker's job is to ensure yours has the appropriate protection it needs, relevant to its operations and activities.

Cyber insurance is designed to help mitigate the potential financial losses incurred in the event of an attack for loss of data, liability claims and reputational repair. The impact of cyber-crime is not just immediate, it can have a long lasting legacy – damaged reputations can lead to loss of confidence and eventual loss of members - and revenue.

Tips for stronger cyber-security:

- Never disclose your banking codes, passwords or personal information
- Report any suspicious emails or phone calls
- Install anti-virus software on your computer and keep it updated
- Ensure your company has adequate insurance protection from the consequences of cyber-crime



MIKE FARRELL

Account Executive, Howden Sport,
Recreation & Equine

Example

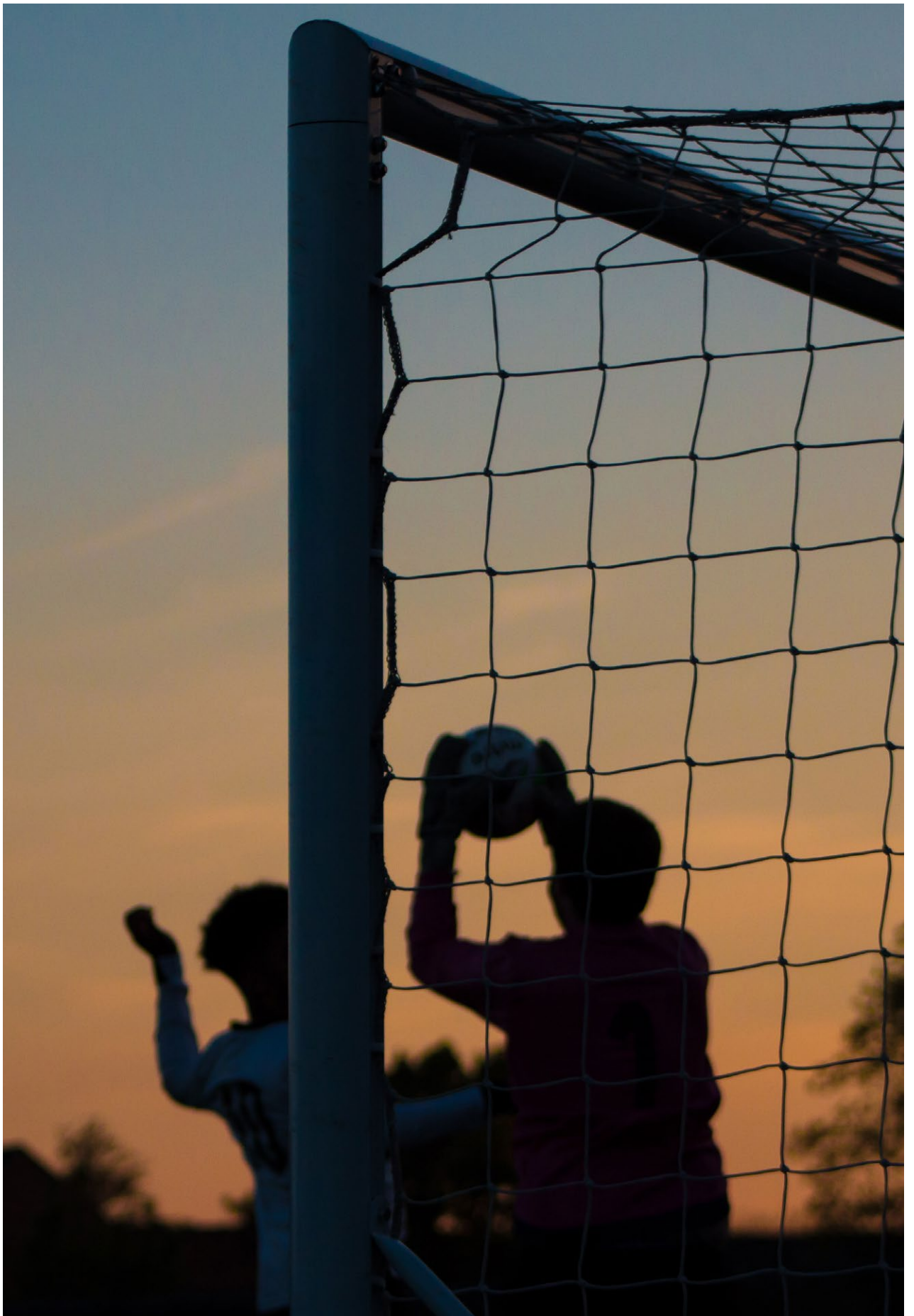
A volunteer for a club that sells products to the rural community receives an email with a limited time promotion for premium goods, from a source they believe to be reputable, and have purchased from before. They click on the link in the email which loads malware onto their workstation infecting the network. The malware is designed to access and forward account details and member's personal data before permanently deleting all information on the club's servers. They are unable to transact business for a period of time until its systems are up and running again and have to report the incident to the information commissioner.

Cyber Liability

Your main commercial policy may provide some cover towards the costs of recovering data and lost income, however in many instances this cover is limited; this is particularly acute where an organisation relies on its systems for day-to-day activities.

In this scenario, a Cyber Liability policy could provide specialist cover for the costs associated with recovering data and reinstating systems in addition to reimbursing the lost income. Importantly it could also cover subsequent fines and investigations from the data protection regulators.

Technology evolves at a rate of knots. It can help organisations immensely but it can also come with some associated risks. Don't fall foul of these risks by being either under-prepared or under-protected.



Howden UK Group Limited

Tricorn House, 51-53 Hagley Road, Birmingham B16 8TP

T +44 (0)121 698 8000

F +44 (0)121 625 9000

E info@howdengroup.com

www.howdengroup.com

// Part of the Hyperion Insurance Group

Howden is a trading name of Howden UK Group Limited, part of the Hyperion Insurance Group. Howden UK Group Limited is authorised and regulated by the Financial Conduct Authority in respect of general insurance business. Registered in England and Wales under company registration number 725875. Registered Office: 16 Eastcheap, London EC3M 1BD. Calls may be monitored and recorded for quality assurance purposes. 06/18 Ref: 1933



Broker at 

The LLOYD'S logo, consisting of the word "LLOYD'S" in a bold, uppercase, serif font, enclosed within a white rectangular box.