INSURE AS U GO -- MONTHLY HOME INSURANCE --

Introduction

Insure As U Go is a trading name of T&R Direct Limited who is committed to protecting your personal information and that of any named individual on a policy or quotation that we collect via our website or telephone.

The privacy and security of your personal information is very important to us and we want to assure you that your information will be managed, administrated and protected whilst in our hands.

For the purpose of the Data Protection Act 1998 (the "Act"):

Data Controller (or Owner)

The natural person, legal person, public administration or any other body, association or organisation with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of the website. The Data Controller, unless otherwise specified, is the Owner of the website.

Data Processor (or Data Supervisor)

The natural person, legal person, public administration or any other body, association or organisation authorised by the Data Controller to process the Personal Data in compliance with this **Privacy Policy**.

How to contact us about your information

If you would like to speak to us about how we use your information, you can contact us on 01202 307930. Please ask for the Data Protection Champion.

Alternatively, if you have any worries about how we use your information then you can write to the Data Protection Champion at:

Insure As U Go Concept Park Unit 6 Innovation Close Poole Dorset BH12 4QT

Please be aware your call may be recorded for evidential purposes regarding quotations, policies or for administrative changes.

Your rights

You have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Protection Champion to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Protection Champion at the contact information set out above.

You have the following rights in relation to our use of your personal information.

The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests. Your personal information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case, please contact us by using the details shown in your documentation and you can ask us to update or amend it.

The right to erasure

In certain circumstances, you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors, for example according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.

Right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to process your personal information.

Right to data portability

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.

Right to object to direct marketing

You can ask us to stop sending you marketing messages at any time. Please see the Direct Marketing section for more information.

Right not to be subject to automated-decision making

Some of our decisions are made automatically by inputting your personal information into a system or computer and the decision is calculated using certain automatic processes rather than our employees making those decisions.

The right to withdraw consent

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. Please note in some cases we may not be able to process your insurance if you withdraw your consent.

The information we collect and how we collect it

The information you provide to Insure As U Go

We may receive personal information about you when you contact us or from someone you have authorised to incept a policy on your behalf or a comparison website to whom you have given your details for example by doing any of the following:

- Obtaining a quotation
- · Purchasing a policy from us or from one of our partners
- · Amending your policy throughout its duration
- · Registering a claim
- · Using our website
- Telephoning, writing by email or post, texting or coming into our office directly
- Responding to a contact form

The information we collect may include:

- Personal details such as your name, address, date of birth, marital status, telephone number, email address and debit or credit card details
- Information about your lifestyle and insurance needs such as your home, car, bike, travel requirements and your health
- Information about other policies held by us, including claims history, quotation history, payment history
- Information of all policies including dates or purchase, lapses and cancellations
- · Your marketing preferences
- Information about your employment, including salaries (when applicable)
- Sensitive personal information such as health information (for example alcohol consumed, recreational drug use, current state of health, existing conditions, family or personal history in relation to some conditions)
- · Additionally, information about previous unspent criminal convictions
- Information from third parties, insurers, witnesses and solicitors (relating to incidents)

We may also monitor or record calls, text messages, emails, or other communications in accordance with UK law, and in particular for:

- · Business purposes such as training and quality control
- Processing necessary for entering into or production of a contract
- · Protecting your vital interests
- Ensuring effective systems operation
- · Meeting any legal obligation
- For our other legitimate interests
- All personal information will be held in confidence and used only for the purposes for which we collect it.

You can visit our website without disclosing any personal information, although we may use cookies to collect non-personal information about your browsing. Please refer to the Cookie Policy section for more information.

We will always be clear to explain when and why we need this information and the purposes for which we will use it and will obtain your explicit consent to use sensitive personal information. Failure to provide consent for the use of such sensitive information may result in an inability to provide an insurance quote or to incept or renew your policy.

We will retain this information as required and directed by the Financial Conduct Authority (FCA) to support our ability to manage and administrate your policy, respond to complaints, demonstrate compliance with FCA rules and to support our ability to defend against legal claims.

Contacting forms

By filling in the contact form on our website with your data, you authorise Insure As U Go to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data collected: address, date of birth, email address, first name, last name, number of employees, phone number and various types of data.

Content commenting

Content commenting services allow users to make and publish their comments on the contents of the website.

Depending on the settings chosen by Insure As U Go, users may also leave anonymous comments. If there is an email address among the Personal Data provided by the user, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when users do not use the content commenting service.

Personal Data collected: email address and website address.

Telephone Call Recording

Telephone calls will be recorded for evidential purposes regarding quotations, policies or for administrative changes.

We may engage third parties to carry out compliance and quality monitoring on our behalf. Customer data including recorded calls may be made available to third parties for this purpose.

Calls are retained for a minimum of 1 year or longer, as specified within the **Personal Information retention period** section, when a quotation is obtained, a policy is purchased or any other administration query is made.

Calls may also be recorded for training purposes, including compliance and quality scoring.

Recruitment

Information for the administrative processing of job applications and recruitment.

This refers to all of the information related to recruiting, including personal identification information (e.g. ID photos, names, resident registration numbers, addresses, phone numbers, occupations and e-mail addresses), credit transaction information, credit information, educational background information, past career information, any military service information, family relationship information such as next of kin, other qualifications and merit or awards received.

Personal Information about others

We may collect information about other individuals for example persons who may drive your car or be named as a joint policyholder on your home insurance or may be included on a travel policy.

If you give us information about another person, it is your responsibility to ensure and confirm that:

You have told the individual who we are and how we use personal information, as set out in this **Privacy Policy**.

And you have the permission to provide that personal information (including any sensitive personal data) to us for the processing of it, as set out in this **Privacy Policy**.

Analytics

The services contained in this section enable Insure As U Go to monitor and analyse web traffic and can be used to keep track of user behaviour.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

 $Google\ Analytics - \underline{Privacy\ Policy} - \underline{Opt\ Out}$

System logs and maintenance

For operation and maintenance purposes, Insure As U Go and any third-party services may collect files that record interaction with the website (System logs) or use for this purpose other Personal Data (such as IP Address).

How we use and share your information

To manage and administrate quotes and policies, including to:

- Access your application for a product, service or quote for one or multiple insurers on our panel and subsequent renewal
- · Understand your risk so far as to offer you our best premium
- · Verify your identity and carry out fraud prevention and detection checks
- · Provide you with premiums and payment options
- · Check that you can afford a credit agreement
- · Assist you with claims and enquiries
- · To monitor compliance and quality
- · Deal with complaints
- To inform you about other related products and offers we or third parties are able to provide (subject to your consent)
- Carry out statistical analysis, market research and customer profiling to deliver offers and products we feel may be of interest to you and support our pricing ability to reduce costs
- We may also share information with law enforcement bodies and regulators such as the Police and the FCA as permitted by law
- Analysing information about you including your searching and browsing data on a personalised or aggregated basis

Fraud Prevention and Detection

It is important that the information provided throughout the duration of a policy and at the initial quotation time is accurate. If information is found to be incorrect, this may affect your ability to claim and could result in a difference in premium or the insurer no longer being able to cover the risk.

In order to prevent or detect fraud we will check your details with various fraud prevention agencies and anti-fraud registers, who may record a search. Insurers pass information to the Claims Underwriting Exchange register, run by Insurance Database Services Ltd (IDS Ltd). The aim is to help us check information provided and also to prevent fraudulent claims.

For customers who have taken out a motor insurance policy, your policy details will be added to the Motor Insurance Database ("MID"), run by the Motor Insurers' Information Centre ("MIIC"). MID data may be used by the Driver and Vehicle Licensing Agency and DVLNI for the purpose of Electronic Vehicle Licensing and by the Police for the purposes of establishing whether a driver's use of the vehicle is likely to be covered by a motor insurance policy and/or for preventing and detecting crime. If you are involved in an accident (in the UK or abroad), other UK insurers, the Motor Insurers' Bureau and MIIC may search the MID to obtain relevant policy information.

Persons pursuing a claim in respect of a road traffic accident (including citizens of other countries) may also obtain relevant information which is held on the MID. You can find out more about this from us, or at www.miic.org.uk

We may also share your information with law enforcement agencies, other organisations and public bodies where we reasonably believe it is necessary for the prevention and detection of fraud, crime or where required to do so under a court order.

Third Party Processors

In order to deliver our services to you we will use third party processors (for example for the purposes of data hosting, data transfer, call recording, credit searches and fraud prevention). Such processing is conducted under contract and we ensure that appropriate data protection and securities are provided.

How to find out what information we hold about you

You have the right to access or request a copy of all the personal information we hold about you in a Subject Access Request. Should you wish to enforce this right then simply write to us at the following address:

Data Protection Champion

Insure As U Go Concept Park Unit 6 Innovation Close Poole Dorset BH12 4QT

We will respond within 30 days of us receiving a request. If it relates to one or more of our partners you will need to write to them directly. For this contact information, please call the office on 01202 307930 and one of our staff members will provide the relevant information.

Alternatively, you can email enquiries@insureasugo.co.uk with your requirements and a response will be received within 48 working hours depending on our opening times.

You have the right to submit a complaint to the Information Commissioner (ICO) if you feel we have not complied with our obligations under the Data Protection

If you would like to contact the UK's Information Commissioner's Officer direct; please write to the Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Telephone: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number https://ico.org.uk/global/contact-us/email/

Direct Marketing Preferences

We may contact you by telephone or by post for our legitimate marketing purposes in order to inform you of your renewal date, renewal premiums, to renew your policy online, over the telephone or via a BAC's transfer and to let you know about other products and services we may provide you.

With your consent (as necessary), we may from time to time contact you by email or SMS with details of other products and services.

We will always give you the opportunity to 'opt-out' of direct marketing of any kind when you request a quote online, purchase a product from us, receive emails, texts or other direct marketing correspondence.

Alternatively, you can let us know at any time by calling 01202 307930 or emailing us at <a href="mailto:enauge:en

Data Transfers and Consent

We may need to use third parties located in countries outside of the European Economic Area (EEA) from time to time. If your information is processed outside of the EEA we will take the necessary steps to ensure it is adequately protected and secured. This includes ensuring there is an agreement in place with the third party that provides the same protection standards as necessary by the data protection regulations in the EEA.

By providing your personal information to Insure As U Go, you consent to the transfer of your information as mentioned above.

Security

We are committed to protecting and securing the information that you provide to us and we put in place appropriate technical, physical and organisational security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information.

You should also be aware that communications over the internet, such as emails, are not secure unless they have been encrypted.

Cookie Policy

Our website uses various cookies. We have detailed below how the use of cookies may affect you.

What are cookies?

Cookies are small data files that a website will put on your device. They enhance your experience and provide useful information to companies. This allows you to use the website more efficiently, saving you time not having to reenter details necessary each time you visit our website. Cookies cannot affect your device.

Cookies we may use

- Performance These cookies allow us to recognise and monitor visits to our website, observing how users navigate throughout our site. This helps us to customise the user experience, tailoring our site to suit the individual.
- Essential These are technical cookies that are essential for the operation of our website. For example, these cookies enable you to log into secure areas.
- Session These cookies remain in use until you close your browser. Once closed, these are automatically deleted.
- Persistent These remain on your device until removed manually or automatically.

How you can control cookies

You may block or restrict cookies by altering your browser settings at any time. If you wish to change them and find out more information, then visit www.allaboutcookies.org.

Upon amending your browser settings, when accessing our website the service provided may be limited depending on the change.

Personal Information retention period

We will keep your personal data for a period of 7 years. For Liability policies, we will keep information for up to 40 years. This does depend on the category of data and the area of data it is applicable for including employment law or for compliance purposes. The others reasons for retaining data are:

- · Legal requirements
- Legal Proceedings
- Complaints
- · Accident Books
- · Providing evidence of claims free experience
- Subject Access Requests
- Direct Marketing stopped if requested
- · Payment/Salary queries
- Fraudulent activity
- · Employment

Once the purposes for which your personal information was collected or provided have been fulfilled, your personal information will be destroyed in one of the following ways:

- Personal information printed on paper will either be securely shredded in a paper shredder or incinerated.
- · Personal information stored electronically will be marked 'Beyond Use'.

All forms of sensitive date (Special Category) will be deleted once the information is no longer required as set out under the Data protection Act 1998.

Changes to this Privacy Policy

We may amend this **Privacy Policy** from time to time for example, to keep it up to date or to comply with legal requirements. You should regularly check this **Privacy Policy** for updates. If there will be any significant changes made to the use of your personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our website. If you object to any of the changes to the Policy, you must cease using Insure As U Go and can request that the Data Protection Champion remove the Personal Data. Unless stated otherwise, the then-current **Privacy Policy** applies to all Personal Data the Data Controller has about users.