

## PlanProtect Limited Privacy Notice

### Purpose of this notice

This privacy notice is relevant to anyone who uses our services, including policyholders, prospective policyholders, and any other individuals insured under a policy. We refer to these individuals as "you/your" in this notice.

We are dedicated to being transparent and this privacy notice tells you what we do with the personal data that we collect about you.

We process your personal data in accordance with the relevant data protection legislation. We are the data controller for the data that we process about you and we will not collect any personal data from you that we do not need for the purposes of administering your insurance policy. There may be additional data controllers, such as the insurer/s.

### Contact details

We are PlanProtect Limited, referred to as "we/us/our" in this notice. Our data controller registration number issued by the Information Commissioner's Officer is **ZB497527**. Our registered address is :- Brookfield Court, Selby Road, Leeds, West Yorkshire, LS25 1NB. (Registered company number 14519486). PlanProtect Limited is an appointed representative (FRN 988654) of Bspoke Commercial Ltd, a company authorised and regulated by the Financial Conduct Authority (FRN 709456).

### Anything you are not clear about

If you have any questions, or if there is anything that you are unclear about, please contact us at [enquiries@planprotect.co.uk](mailto:enquiries@planprotect.co.uk) and we will be happy to answer any queries you may have concerning this privacy notice or the way we process your personal data.

### Why is your personal data required?

The provision of your personal data is necessary for us to provide you with an insurance quotation for our products and/or administer your insurance policy and meet our contractual requirements under the policy.

If you fail to provide the data, it may mean that you are unable to exercise your contractual rights, including claiming under the policy. This would also hinder our ability to administer your insurance policy.

### What information do we collect about you?

We may collect the following personal data about you:

#### ❖ Information collected from you

When you request us to provide you with a quote for one of our insurance policies or you purchase an insurance policy from us, you provide your personal information which may include the following categories:

- your name, address and contact details, including email address, telephone number and date of birth
- name and date of birth of any additional insured parties
- details of your bank account
- information about your marital status
- information about your medical or health conditions

#### ❖ Information collected from other sources

We may collect personal data about you from others. This includes the following information:

- where you are a joint or additional insured party we may collect information about you from the policyholder
- fraud prevention, law enforcement or government agencies and other data sources used to prevent or detect fraud or provide details to us about criminal convictions or offences
- HM Treasury and other authorities in relation to regulatory issues e.g. checking against the HM Treasury's asset freezing list for individuals that are subject to financial sanctions
- credit reference agencies. We may use a third-party provider to undertake credit searches on our behalf when we produce a quotation for a new policy or at renewal. The third-party provider may undertake credit checks to help us decide whether we will offer you credit when you choose to pay by Direct Debit instalments

#### ❖ Special personal information

We may process some special categories of your personal data, such as information about your health. If applicable, we may use information about a child, where the child is insured under a policy.

We collect this data as we are required to use this information as part of your insurance quotation or insurance contract with us. We may also process the data where it is necessary for a legal obligation, or as part of the establishment or defence of a legal claim.

We also process special categories of your personal data as it is in the substantial public interest and it is necessary: i) for administering your insurance policy; or ii) to prevent and detect an unlawful act (e.g. fraud).

This is not an exhaustive list and in specific instances, we may collect more personal data than stated above.

### **Why do we process your data?**

We use your personal data to meet our obligations in our contract of insurance with you.

#### ❖ To provide insurance services

Where you have requested us to provide you with a quote for one of our insurance policies, or you have purchased an insurance policy from us, we may use your data for the following purpose(s):

- to decide what the risk might be in selling you the policy, to quote for, and provide you with a premium for that policy
- to administer your policy and monitor the payment of instalments if you pay your premium in this way
- to contact you about the policy (e.g. for billing or renewal purposes)
- to provide the agreed service if you make a claim

It is essential we process your personal data to provide you with an insurance policy. It may also be necessary for us to make automated decisions about you as part of this processing.

#### ❖ To comply with our legal obligations

As part of our duties involved with providing insurance services, sometimes we are required by law to use information about you:

- to deal with complaints
- to help prevent and detect crime (including, for example, the prevention or detection of fraud)
- to comply with a legal or regulatory obligation and/or assist our regulators (e.g. Financial Conduct Authority)

We can use your personal data in this way because we are required to do so by law.

#### ❖ Prevent fraud

We may share your information with other public bodies, including the police to detect and prevent fraudulent claims and/or activities.

❖ Prevent prohibited individuals from accessing insurance

We may use your information to check whether you are listed on the HM Treasury's list and as a result prohibited from certain activities or industries. This will help us to prevent carrying out transactions with a person or organisation subject to an order.

❖ Recover debt

If you owe us money we will use your personal data to help us recover it. We can use your personal data in this way because it is a necessary part of the contract of insurance. Ensuring that premiums are paid will ensure that the majority of our customers do not experience increased premiums due to the actions of a small minority of customers.

We have a legitimate interest to undertake prevention of fraud, to prevent prohibited individuals accessing insurance and recovering debt.

❖ To inform you about and promote products (marketing)

At the time when we collected your personal data, to provide you with an insurance quotation and/or arrange your contract of insurance, we asked you to indicate your marketing preferences. These preferences can be revisited at any time by contacting us at [enquiries@planprotect.co.uk](mailto:enquiries@planprotect.co.uk).

We may use your personal data to offer you suggestions about products and services that you might want to buy. We have a legitimate interest to use your information for this purpose, as the suggestions will be relevant to you and it will be part of providing you with the right information at the right time and looking at ways that we can extend our relationship with you.

We will always ensure that we keep the amount of your personal data that we collect and the extent of any processing to the absolute minimum to meet this legitimate interest. If at any time you do not wish us to use your personal data for this purpose, you may ask us not to do so.

If you have chosen not to opt out of marketing, we will send you information about our products and services by email only, unless you tell us not to.

❖ To improve our services

We may use your information to improve our services:

- to help develop our products, services and systems to deliver a better experience in the future
- we can use your personal data in this way because it is in our legitimate interests to provide the services in the most efficient way. We will always ensure that we keep the amount of your personal data that we collect and the extent of any processing to the absolute minimum to achieve this efficiency

### **How do we protect your data?**

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed by unauthorised individuals.

### **How long do we keep your data for?**

As a rule, we will keep your personal data for seven years following the end of your relationship with us, as it is likely that we will need the information for regulatory reasons or to defend a claim.

We will also retain data in an anonymous form for statistical and analytical purposes.

Following the end of the retention periods, your personal data will be securely destroyed.

## Who might we share your data with?

Your information may be shared with the following categories of third parties.

- Insurers/ reinsurers
- Claims third party administrators
- Complaints third party administrators
- Organisations, including parties they are contracted with, who provide a service related to the insurance policy
- Loss adjusters
- Regulatory authorities
- Fraud prevention agencies
- Credit reference agencies
- Legal or crime prevention agencies
- Any additional insured parties who may communicate with us on your behalf, provided that they have your permission.

## Do we share your data outside of the UK?

Sometimes we, or third parties acting on our behalf, may need to transfer or store Personal Information outside of the UK. Where we do this, we will take steps to make sure that any transfer of Personal Information outside of the UK is carefully managed to make sure that that it is protected.

This might include transfers to countries that the UK considers will provide adequate levels of data protection for your Personal Information (such as countries in the European Economic Area) or placing the party we are transferring information to under contractual obligations to protect your personal information to adequate standards.

When you pay for your insurance policy, you will be redirected to Stripe Inc, the third-party platform that we use as a merchant to safely conduct online payment transactions. Stripe Inc. hosts the data in the US. To ensure the adequate protection of personal data, Stripe Inc. have certified to the EU-U.S. Privacy Shield Framework. In addition to Privacy Shield, Stripe Inc continues to employ additional compliance measures to ensure an adequate level of protection of personal data transferred outside the European Economic Area.

Please refer to Stripe's privacy notice for further information: <https://stripe.com/gb/privacy>.

## When do we make automated decisions about you?

When you give us your information, our computer systems may make automated decisions about you. The decisions made about you are based on what types of risk that we can insure. The automated decision may impact the level of premium you will pay or the type of product that we can offer to you.

## Your rights as a data subject

We thought it would be helpful to set out your rights under the relevant data protection legislation. You have the right to:

- withdraw consent where that is the legal basis of our processing
- access your personal data that we process
- rectify inaccuracies in personal data that we hold about you
- be forgotten, if the processing of your personal data is no longer necessary for the purposes it is collected for, your details would be removed from systems that we use to process your personal data
- restrict the processing in certain ways



- obtain a copy of your data in a commonly used electronic form (if the legal basis of our processing is consent or necessary for contract)
- object to certain processing of your personal data by us

Please see <https://ico.org.uk> for further information on the above rights. You may also contact us at [enquiries@planprotect.co.uk](mailto:enquiries@planprotect.co.uk) for further information.

You have a right to complain to the Information Commissioner's Office about the way in which we process your personal data. Please see <https://ico.org.uk>.